

Local Plan 2040

Regulation 18 Stage 1 consultation

Upper Clatford Parish Council response

TVBC have produced a draft Local Plan 2040 that will shape how the Borough evolves over the next two decades. It is pleasing to see numerous vision statements that echo the aspirations of our parish residents (as evidenced in our ‘made’ Neighbourhood Plan, adopted 2021).

The draft plan covers some topics and areas that have less day-to-day relevance to parish residents (for example, the re-development of Romsey); UCPC’s response is therefore targeted at topics of more relevance to our parish. It will be left to individual parishioners to comment upon the proposals concerning other matters.

The Local Plan that will ultimately be submitted for examination will be tested for ‘soundness’ using the key attributes of [positivity, justification, effectiveness and consistency with national policy](#). UCPC’s response is therefore structured using these criteria.

The Local Gap

‘Consistency with national policy’

1. The Upper Clatford Parish Council (UCPC) wishes to see continued use made of Local Gaps in the Local Plan 2040. The Andover - Anna Valley/Upper Clatford Local Gap is a valued means of preventing the coalescence of these settlements and of retaining their identity. This role has been detailed in the made Upper Clatford Neighbourhood Development Plan (NDP). The Parish Council notes the comments at para. 4.41 of the present Local Plan consultation document – that if local gaps are to be included, they will need robust justification in terms of principle and location as national guidance does not contain specific requirements for their use.
2. The National Planning Policy Framework (NPPF, July 2021) makes no specific reference to Local Gaps and as such is not prescriptive on supporting or opposing their use in principle. However, the absence of a reference does not in itself mean their use would not be consistent with the NPPF. Rather, it is a reflection of the high level of policy necessarily set out in the national document. It provides a framework for locally-prepared plans, and it is right that these take local circumstances into account to reflect the character of each area.¹

¹ NPPF paras. 1 and 9.

3. The UCPC believes that local gaps are consistent with national planning policy and guidance. Consistency with national policy is one of the tests that the Local Plan will need to meet if it is to be found 'sound'. Noting that local gaps are to be considered in the next stage of Local Plan consultation, the Parish Council assumes that any Local Gap policy would be deemed non-strategic. For such policies, the NPPF states that the tests of soundness will be applied in a proportionate way, taking into account the extent to which they are consistent with relevant strategic policies for the area.² It follows that any Local Gap policy should not be assessed on its own, but alongside other strategic and non-strategic policies which overall contribute to the Plan's Vision and to meeting its objectives.
4. The Parish Council therefore assumes that the identification of Local Gaps in the Local Plan 2040 would be set within the context of a plan which has been positively prepared to meet identified development needs and promote sustainable development. The Framework explains³ that achieving sustainable development requires the planning system to pursue three interdependent objectives – economic, social and environmental. Local Gap designations by their nature and purpose contribute positively to the environmental objective, which includes protecting and enhancing the natural, built and historic environment, and to the social objective in that they support communities' health, social and cultural well-being (on both sides of the Local Gap). As a consequence, such a policy approach is not just consistent with national policy in a passive fashion, it positively promotes the environmental and social objectives and so contributes to sustainable development. This contribution, and the consistency of the approach with national planning policy, is detailed in the table below.

² Ibid., para. 36.

³ Ibid., para. 8.

NPPF reference	Summary of NPPF provision	Relevance to a Local Plan policy on Local Gaps
Achieving sustainable development: para.9	Planning policies should play an active role in guiding development towards sustainable locations taking local circumstances into account, to reflect the character, needs and opportunities of each area.	Local gaps are a means of delivering this by guiding development in a way which reflects settlement character and protects their countryside setting.
Plan-making: para. 15	Plans provide a platform for local people to shape their surroundings.	The Local Plan stage 1 consultation recognises that there is strong support from communities for local gaps. This is evidenced in consultation undertaken for the UC NDP and more recently confirmed by a UCPC survey in March 2022. Continued inclusion of a Local Gap policy in the Local Plan 2040 will deliver against this aspect of national policy.
Plan-making: para. 28	Non-strategic policies should be used to set out more detailed policies for specific areas which can include conserving and enhancing the natural and historic environment and other development management policies.	A Local Gap policy intended to maintain the separate identity of settlements would be entirely consistent with this provision.

NPPF reference	Summary of NPPF provision	Relevance to a Local Plan policy on Local Gaps
<p>Promoting healthy and safe communities: para. 92 c) and 98</p> <p>Glossary entry for green infrastructure</p>	<p>92 c): Planning policies should enable and support healthy lifestyles including through the provision of safe and accessible green infrastructure.</p> <p>98: Access to a network of high quality open spaces and opportunities for physical activity is important for the health and well-being of communities.bb</p> <p>Glossary: Green infrastructure is a network of multi-functional green spaces capable of delivering a wide range of environmental, economic and health and well-being benefits for nature, climate, local and wider communities and prosperity.</p>	<p>A Local Gap policy will help to achieve this by protecting open countryside around settlements and so helping to enable countryside access and other benefits of green infrastructure.</p> <p>Andover – Anna Valley/Upper Clatford Local Gap is an exemplar of such green infrastructure offering recreational, countryside access and biodiversity benefits.</p>
<p>Achieving well-designed places: para. 130 c) and d)</p>	<p>Planning policies should ensure developments are sympathetic to local character and history including surrounding built environment and landscape setting, and establish or maintain a strong sense of place.</p>	<p>A Local Gap policy will help to achieve this, maintaining a sense of place by protecting the countryside around settlements which contributes to local character, the historic pattern of settlement including the separation between settlements, and their landscape setting.</p>
<p>Conserving and enhancing the natural environment: para. 174 b)</p>	<p>Planning policies should contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside.</p>	<p>A Local Gap policy will help to achieve this by recognising the role of countryside around settlements in contributing to the character of the area and settlements within it.</p>

NPPF reference	Summary of NPPF provision	Relevance to a Local Plan policy on Local Gaps
Conserving and enhancing the natural environment: para. 175	<p>Plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure.</p> <p>See above for Glossary entry on green infrastructure.</p>	<p>A Local Gap policy will help to achieve this by protecting open countryside around settlements and so creating the opportunity to maintain and enhance habitats and green infrastructure.</p> <p>As noted above, the Andover – Anna Valley/Upper Clatford Local Gap is an exemplar of such green infrastructure offering recreational, countryside access and biodiversity benefits.</p>
Conserving and enhancing the historic environment: para. 190 c) and d)	Plans should take into account the desirability of new development making a positive contribution to local character and distinctiveness and of opportunities to draw on the contribution of the historic environment to the character of a place.	A Local Gap policy will help to achieve this by recognising areas which are important to local character and distinctiveness, including where the historic settlement pattern and a long-standing separation between settlements contributes to the character of a place. This is particularly important in sensitive cases such as Andover and Upper Clatford, where a larger settlement lies close to a much smaller village with a distinctive and historic linear settlement pattern.

5. Planning Practice Guidance (PPG) provides further support and justification for the continued use of a Local Gap policy as a way of helping to deliver national policy for the achievement of sustainable development. As with the Framework, PPG is not prescriptive on the use of Local Gaps with no specific provision, but does include further guidance on recognising the intrinsic character and beauty of the countryside which a Local Gap policy would be consistent with and positively help deliver:⁴

The National Planning Policy Framework is clear that plans should recognise the intrinsic character and beauty of the countryside, and that strategic policies should provide for the conservation and enhancement of landscapes. This can include nationally and locally-designated landscapes but also the wider countryside.

⁴ PPG Paragraph: 036 Reference ID: 8-036-20190721.

Where landscapes have a particular local value, it is important for policies to identify their special characteristics and be supported by proportionate evidence. Policies may set out criteria against which proposals for development affecting these areas will be assessed. Plans can also include policies to avoid adverse impacts on landscapes and to set out necessary mitigation measures, such as appropriate design principles and visual screening, where necessary. The cumulative impacts of development on the landscape need to be considered carefully.

6. PPG also confirms the value of green infrastructure as may be enabled through a Local Gap policy, explaining that it can help deliver a number of planning objectives.⁵ Many of these benefits are being provided now by the Andover – Anna Valley/Upper Clatford Local Gap:

Achieving well-designed places: the built environment can be enhanced by features such as green roofs, street trees, proximity to woodland, public gardens and recreational and open spaces. More broadly, green infrastructure exists within a wider landscape context and can reinforce and enhance local landscape character, contributing to a sense of place and natural beauty.

Promoting healthy and safe communities: Green infrastructure can improve the wellbeing of a neighbourhood with opportunities for recreation, exercise, social interaction, experiencing and caring for nature, community food-growing and gardening, all of which can bring mental and physical health benefits. ... Green infrastructure can help to reduce health inequalities in areas of socio-economic deprivation and meet the needs of families and an ageing population. It can also help to reduce air pollution and noise.

Mitigating climate change, flooding and coastal change: Green infrastructure can contribute to carbon storage, cooling and shading, opportunities for species migration to more suitable habitats and the protection of water quality and other natural resources. It can also be an integral part of multifunctional sustainable drainage and natural flood risk management.

Conserving and enhancing the natural environment: High-quality networks of multifunctional green infrastructure contribute a range of benefits, including ecological connectivity, facilitating biodiversity net gain and nature recovery networks and opportunities for communities to undertake conservation work.

7. The Parish Council supports the continued use of adopted Local Plan Policy E3. It is a positively-worded policy with clearly specified criteria for managing development within Local Gaps, whose boundaries are defined on the Proposals and Inset Maps. Possible policy revisions to further enhance the policy's effectiveness have been considered in the light of the recent Eastleigh Inspector's Report.⁶ The UCPC consider these revisions add clarity and they are suggested here for consideration by the Borough Council.

Development within Local Gaps will be permitted provided that:

⁵ Paragraph: 006 Reference ID: 8-006-20190721

⁶ Eastleigh Borough Council's Local Plan 2016-2036, Inspector's Report, March 2022 paras. 184-193.

a) it would not *diminish undermine* the physical separation and/or visual separation; and

b) it would not individually or cumulatively with other existing or proposed development compromise the integrity of the gap *in terms of the character of the countryside or the separate identity of adjoining settlements*.

8. Finally, the UCPC note the exhortation in PPG that

*Where a neighbourhood plan has been brought into force, the local planning authority should take its policies and proposals into account when preparing the local plan.*⁷

The UC NDP includes a key policy on the Andover-Anna Valley Local Gap. Other NDP policies on Local Green Space and Sites of Importance for Nature Conservation serve to illustrate the role of the Local Gap in accommodating and providing green infrastructure. Given that this overall policy approach is in full accord with national policy and guidance, as shown above, the UCPC look forward to a constructive dialogue with TVBC as to how to take the Local Gap designation forward in the Local Plan 2040.

‘Positively prepared’

1. In the UC NDP residents’ survey, 87% of respondents rated the Local Gap as ‘fairly’ or ‘very’ important. UCPC have taken measures to confirm whether support for the Local Gap remains robust as recent events have had the potential to alter public opinion. The Covid pandemic has introduced work-at-home implications and the impending cost-of-living crisis might fuel a possible desire for more smaller homes in areas previously considered as unacceptable. UCPC therefore published a survey in March 2022 to reassess our residents’ opinion. Of the 200 responses received within 48 hours, 195 continued to support the concept of a Local Gap and requested the continuation of a specific policy.
2. This would appear to be consistent with the draft Local Plan’s statement that “we know there is strong support for local gaps from our communities”. Additionally, the Statement of Consultation confirms ‘support for retaining local gaps as a means of avoiding coalescence of settlements / helping to retain identity of settlements (especially rural settlements / villages)’. UCPC therefore conclude that the popularity of Local Gaps is not questioned by TVBC but are willing to conduct further community surveys in advance of the stage 2 consultation should TVBC require further evidence.
3. At its core, the draft Local Plan 2040 is built around a vision. This includes the statement⁸ that a “high quality of life will be experienced by our communities, and they will enjoy a strong sense of identity.” UCPC has produced NDP survey evidence

⁷ Paragraph: 006 Reference ID: 61-006-20190723

⁸ Para 2.21

(accepted by TVBC and independent examination) that this strong sense of identity is associated with our non-coalesced village status. “Village identity” was the top reason in our March 2022 survey for retaining a Local Gap. Inclusion of a Local Gap policy will positively support a core draft Local Plan 2040 vision and national guidance.

4. Within the same vision statement is an aspiration that “*the character of our individual settlements will be maintained and their sense of place enhanced*”. If development were to extend over the A303 corridor then the urban edge of Andover would topple over the valley sides, increasing intervisibility and coalescence between settlements along the open valley slope⁹. The settlement edge of Upper Clatford is well defined by the water meadows; the separation that areas such as these provide from a large urban neighbour are invaluable if village character and a sense of place are to be retained. A Local Gap policy will contribute to this key vision.
5. UCPC agree with a further core vision that “*the Borough will continue to be known for its varied, green and distinctive landscapes, heritage and rich ecology*”. A Local Gap policy will assist with focussing growth and development away from inappropriate areas, thereby protecting the distinctive landscape of rural villages, chalkstreams, and former watermeadows that, together with the variety of services provided by larger urban centres, rightly makes Test Valley such an appealing area in which to live¹⁰.
6. A Local Gap policy will help to deliver another TVBC vision - to increase access to the countryside and green spaces for Test Valley residents. Whether it’s parish residents cycling to nearby facilities in Andover or residents in Andover perhaps using footpaths to access our village pub, farm shop or the views from historic Bury Hill fort, the narrow strip of Local Gap countryside provides the positive benefits of countryside views (grazing animals, trees and meadows) and fresh air. This positively encourages a switch from private car usage in accordance with further Local Plan 2040 vision and national guidance.
7. It will be evident that a Local Gap policy will enhance the green corridor along the Pillhill Brook. This will support the recovery of important species such as otter and permit quiet, dark areas of minimal disturbance for wildlife¹¹.
8. TVBC’s Corporate Plan includes the statement “*strengthening our community-led approach to spatial planning so that people can play an active part in shaping their communities*”. Furthermore the draft LP states that “*Neighbourhood Plans provide an opportunity for parishes and local communities to plan for their local community and reflect their aspirations for their area.*” The UC NDP process saw large numbers of residents engage in a planning process on a scale never before seen in this parish and it is likely that parish residents will continue to engage in finding solutions to future challenges if TVBC can demonstrate that public participation is meaningful. It is accepted that decisions cannot be made purely for popularity reasons but with the compelling evidence in favour of a Local Gap policy and the previous successful long-term use of Local Gaps to shape settlement form and retain village identity, TVBC’s inclusion of a Local Gap policy will galvanise local residents and encourage future public participation.

⁹ UC NDP para 8.18

¹⁰ Supports NPPF Para 130 c and d

¹¹ Supports NPPF para 175

‘Justified’

1. TVBC can justify the inclusion of a Local Gap policy as it supports a number of national policy guidelines and accords with our Neighbourhood Plan whose evidence base has been tested by independent examination and already accepted by TVBC.
2. Additionally, *“Where a neighbourhood plan has been brought into force, the local planning authority should take its policies and proposals into account when preparing the local plan.”*¹²
3. Policy E3 of the current Local Plan identifies a number of Local Gaps within the borough of Test Valley, each of which are described fully in TVBC Topic Paper E3 (2014). It can be seen that the retention of Local Gaps versus national guidance vexed TVBC in 2014 with the two options presented as:
 - 1. *Preferred option – establish Local Gaps to protect against the coalescence of settlements.*
 - 2. *Do not identify Local Gaps; consider each proposal on its own merits in line with national guidance and countryside policies”.*
 - It was found that *“Through the appraisal process the first option performed more favourably based on impact on settlement character considerations including preventing coalescence and place setting.”* It is clear that a Local Gap policy, by preventing coalescence, will be the largest possible contributor to delivering the draft Local Plan 2040’s vision of a sense of identity to parishes such as Upper Clatford.

‘Effective’

The 2014 Topic Paper confirms that:

- 1) this mechanism has prevented coalescence between urban areas thus allowing for a clear visual and physical break in the built environment .
- 2) this has enabled settlements to retain their separate identity and local distinctiveness and has thus prevented the characteristics associated with urban sprawl from occurring.
- 3) Areas of undeveloped land protected by Local Gap designations provide a valuable source of green infrastructure which offers important recreational and landscape benefits to the local community as well as nature conservation value.
- 4) The settlement edge of Upper Clatford is well defined by the water meadows. The boundaries of the gap would seem to be the minimum to allow the landscape in between to still function as an effective gap and prevent coalescence. Boundaries are robust and define the settlement edge in both cases.

Whilst this supports the historic effectiveness of the Local Gap, the strip of countryside that defines the villages of Upper Clatford and Anna Valley remains very narrow indeed and a specific policy will provide confidence and clarity to residents and developers alike over the sensitivity of this area. Although National guidance does not mention Local

¹² Paragraph: 006 Reference ID: 61-006-20190723

Gaps, it is inconceivable that TVBC's rationale and good sense which led to their inclusion in the current Local Plan is somehow no longer valid. It would be very positive indeed if TVBC retains a Local Gap policy, which has proved highly effective in maintaining the character of rural settlements in recent years, and would support the National guidance focus on other issues.

Settlement tier hierarchy

1. The draft Local Plan 2040 defines two HMAs, North and South, and invites comments on further sub-divisions of these areas. It is UCPC's view that further sub-division would create unnecessary complexity with little gain.
2. Upper Clatford and Anna Valley have been grouped together with Goodworth Clatford and categorised as a tier 3 settlement within the proposed hierarchy. The stated rationale for grouping is that there are settlements which benefit from and have access to services and facilities within a nearby settlement. This can have an impact on the sustainability of the settlements. An assessment was carried out as to which settlements share facilities and then a judgement made about whether they should be considered as a collective due to their close proximity and sharing of facilities. On this basis we have been combined with Goodworth Clatford but there are a number of reasons why this is flawed.
3. The draft Local Plan 2040 para 2.28 conforms with national guidance by stating that *"the sustainability of our communities is linked to their ability of having easy and safe access (by active or sustainable modes of transport, where possible) to facilities, services and amenities to serve economic and social needs, including shopping, recreation, education, and employment."*
4. In addition, the accompanying Health Impact Assessment reminds us in para 2.23 that *"the prevalence of children classified as being overweight or obese is increasing nationally and childhood obesity is a particular concern."* Furthermore, para 2.35 *"Road traffic has been identified as the most significant source of air pollution within Test Valley"*. In practice, this means that children should be encouraged to walk or cycle to school and that road traffic should be minimised.
5. UCPC can justify a tier 4 placement for the following reasons:
 - We have no school¹³. A primary school is seen as a key facility and we rely on neighbouring villages to provide this service. The Goodworth Clatford primary school cannot be safely accessed by foot or by bicycle - Anna Valley children would need to undertake a 2 mile journey including a stretch of 40mph limit road with no lighting and no footpath. For this reason, a bus service was deemed necessary but this is not universally used and it is evident that parents use cars to drop their children at school bus stops as well as the school. With just one route to the school, there is already congestion during the school run. This school is shared

¹³ Fee-paying Farleigh School in Red Rice not considered.

through necessity only and cannot be considered as a shared facility supporting future growth if draft Local Plan 2040 sustainability visions are to be realised. Abbotts Ann school involves crossing the busy A343 and the issues are as above. It is understood that schools in Andover and Wherwell are, or have been in the past, used by our parish children.

- We have no food shop that sells a selection of everyday branded food items. The Settlement Hierarchy Assessment distinguishes between the key facilities of convenience stores (retail stores) versus the non-key facility of 'other shops'. Anna Valley has a basic farm shop - it is at core a butcher's shop specialising in pork products that also sells a few other very high quality or artisan items. Goodworth Clatford does have a convenience store but the number of our residents that use it compared to the number that use Andover's facilities (which are cheaper, offer more variety, ample car parking and are closer to Anna Valley residents in particular) is likely to be very small indeed. The number of our residents that travel to Goodworth Clatford's shop *sustainably* will be smaller still; the closest alternative (Hexagon stores, Andover) also involves crossing the busy Salisbury Road if walking. The *reality* is that sustainable travel to a well-stocked food store is not an option for nearly everybody in Upper Clatford and Anna Valley.
- It must be remembered, as per the Health Impact Assessment para 2.4, that there are also vulnerable population groups that have the potential to be disproportionately affected by the above factors, such as those with greater physical needs, children, older people, the chronically ill and the disabled. These groups arguably have the greatest need for facilities within a short walking distance.
- The parish Church, All Saints', is located outside of the settled areas; Anna Valley residents need to undertake a 1 mile walk (with gradients) and it's perhaps not surprising that the Church car park is busy during services.
- Anna Valley and Upper Clatford are correctly described as linear settlements. They are effectively co-joined (a small section of Local Gap between the two remains to the north of Foundry Road) and no distinct village centre exists. The few facilities that remain cater to a population of over 1600 and are dispersed. Our neighbours have settlement forms that are more nucleic rather than linear with key facilities generally closely grouped in a village centre in close proximity to most residents (within easy walking distance). The grouping of Upper Clatford and Goodworth Clatford on the basis of the linearity of the two defies logic - Anna Valley residents in particular are closer to Andover and will access those facilities by car. Even if Goodworth Clatford is accessed by car, there is no car park for the shop (or the school) and this impacts upon their village too.
- We are fortunate to have playing fields for younger children in both Upper Clatford and Anna Valley but the sports field for older children (with a full sized football pitch) is located along the same 40mph road between Goodworth and Upper Clatford and is closer to the former than to the latter.
- The draft Local Plan 2040 lists other facilities that will be considered. These include a Post Office and allotments. Abbotts Ann and Goodworth Clatford are served by one and both respectively (with banking facilities) for their smaller populations, we have neither.

- We have no ‘other facilities’ such as a doctors surgery, dentist or chemist; neither does Goodworth Clatford. We are reliant upon car travel to Andover or more-distant Stockbridge for these services.
- Public transport provision is categorised as medium, meeting the criteria of a daily bus service to a large town. The current bus service is so infrequent that buses run with few passengers and often seen devoid of any at all. For the size of our population and with the few facilities available locally, the provision of bus services is in reality very poor. Are older people, for example, expected to wait for lengthy periods at the bus station in Andover for their return journey?

The link with Goodworth Clatford was not made by either UCPC or GCPC, nor is it supported. UCPC share the Local Plan 2040’s vision of communities that sustainably support key facilities, and conversely key facilities that support communities. We fully support TVBC’s goal to “*encourage active and sustainable modes of transport, that are accessible, safe and attractive to use, whilst also seeking to reduce the impact of travel in particular by private car*” and to “*ensure new development facilitates improvements to accessibility, safety and connectivity in our transport infrastructure*”.

A tiered settlement hierarchy is an effective solution if settlements are correctly categorised but UCPC repeat that our facilities are too few and too dispersed with our linear layout for a tier 3 placement, and those of our neighbours are too far or too inaccessible (to vulnerable groups in particular) to be treated as shared facilities.

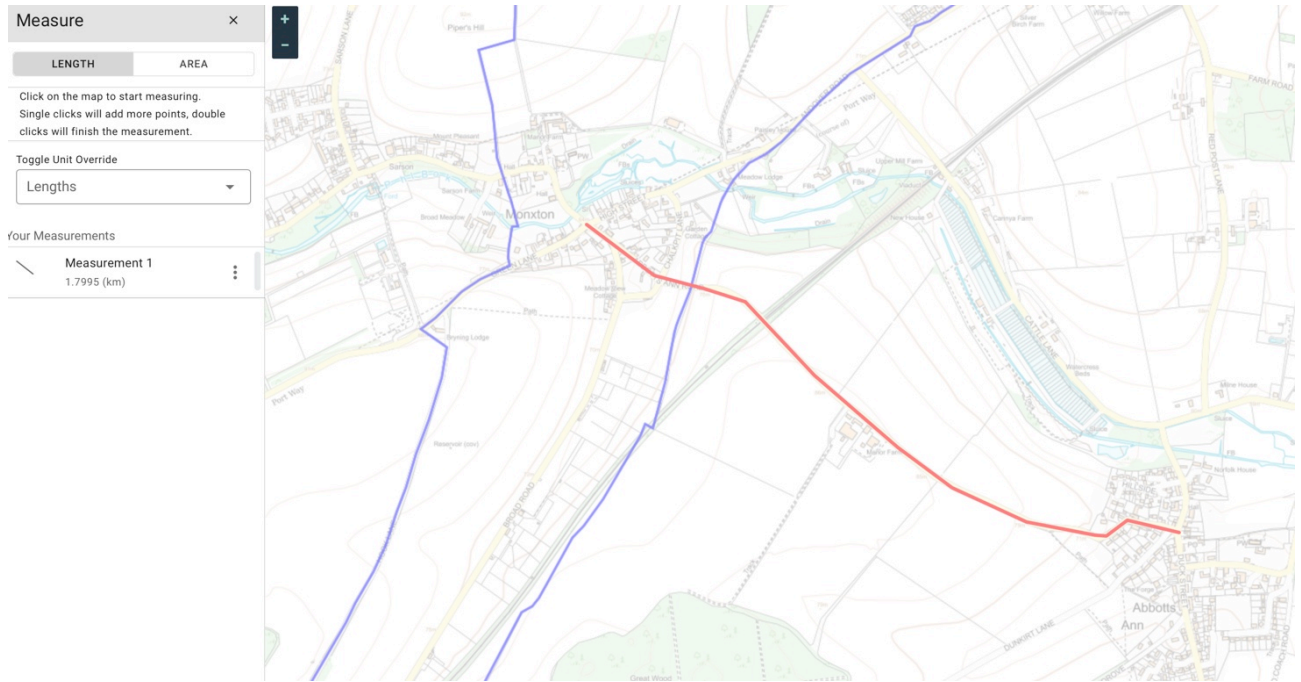
We support TVBC’s grouping of Anna Valley with Upper Clatford as the two are more or less co-joined. This is also the case with nearby Monxton and Ampport - they are sensibly grouped together and have the same number of key facilities as Anna Valley and Upper Clatford. They rightly occupy tier 4, even with their superior level of bus service (H versus our M) and their similar distance to a neighbouring village (Abbotts Ann) and its key facilities, but they have **not** been grouped with Abbotts Ann as Upper Clatford/Anna Valley have been with Goodworth Clatford.

Similarly, Longstock is a comparable distance to Stockbridge and has **not** been grouped either.

The draft Local Plan 2040 can be further improved by removing this inconsistency and placing Upper Clatford and Anna Valley in tier 4.

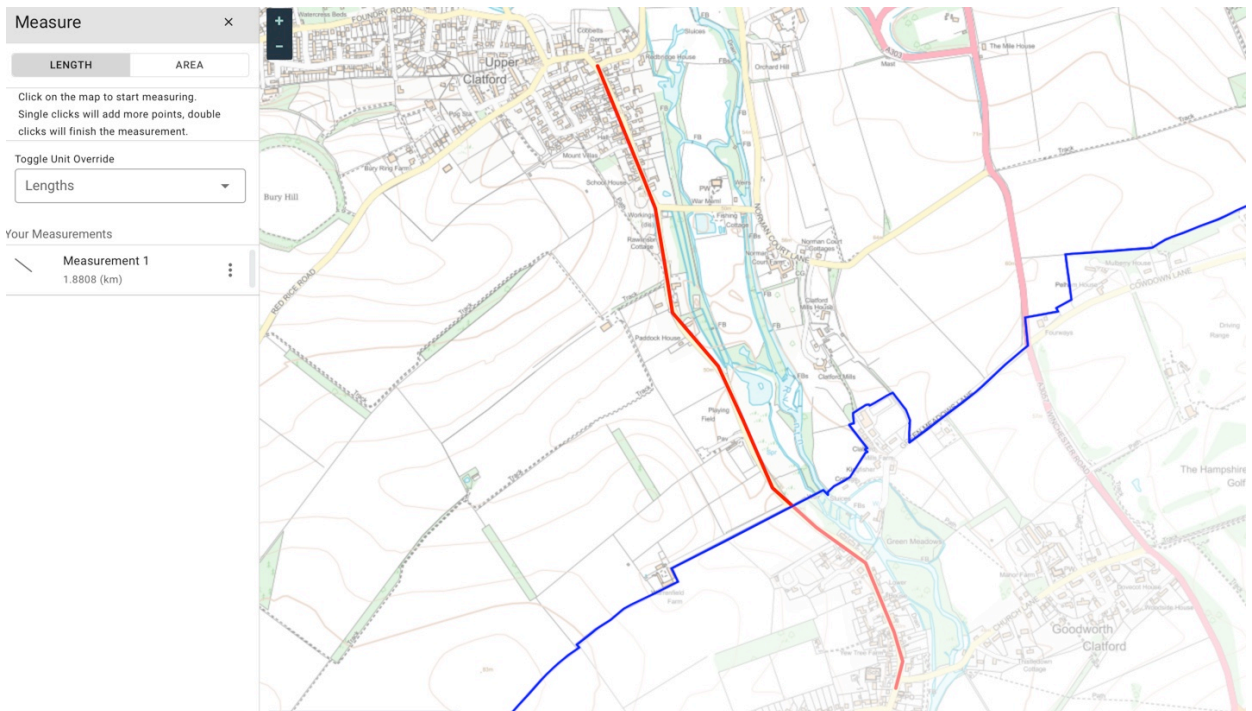
Representative distances (using an assumed village centre where an obvious centre doesn’t exist) are shown below for comparison:

Monxton to Abbots Ann, approximately 1.8km.

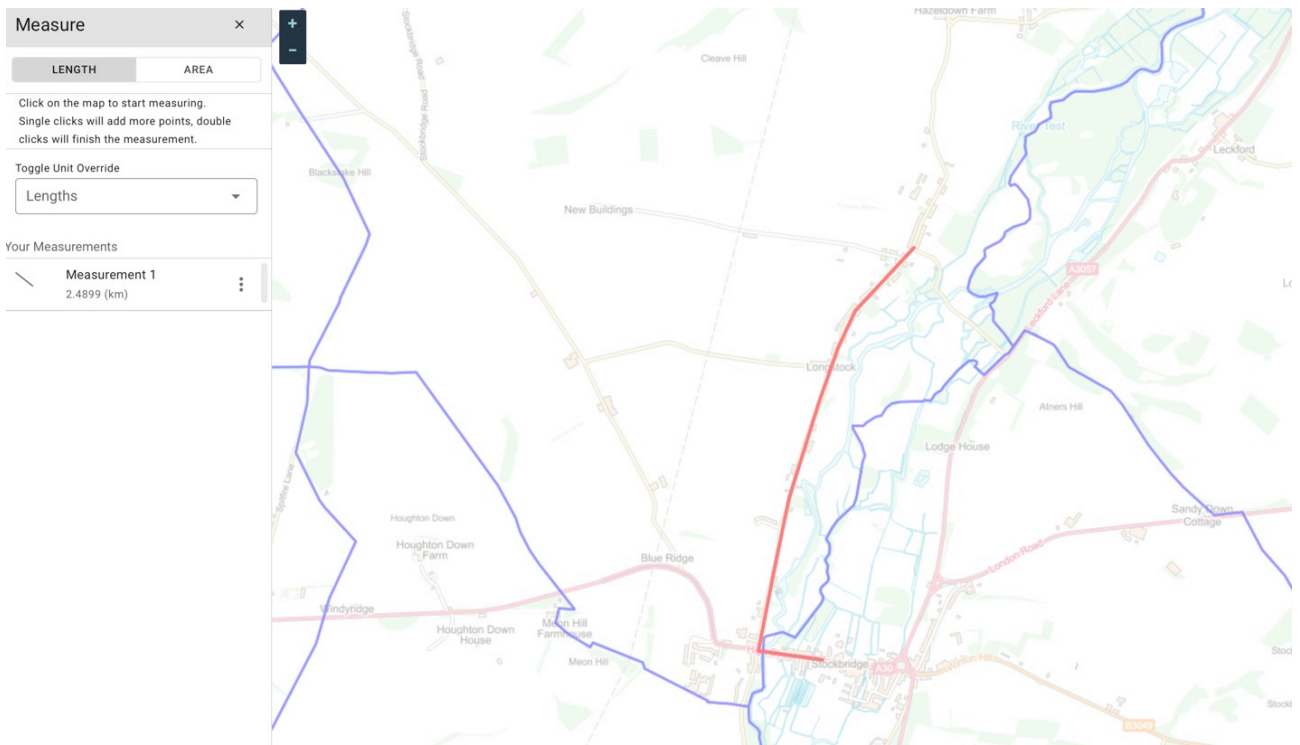


SIMILAR TO:

Upper Clatford to Goodworth Clatford, approximately 1.9km.

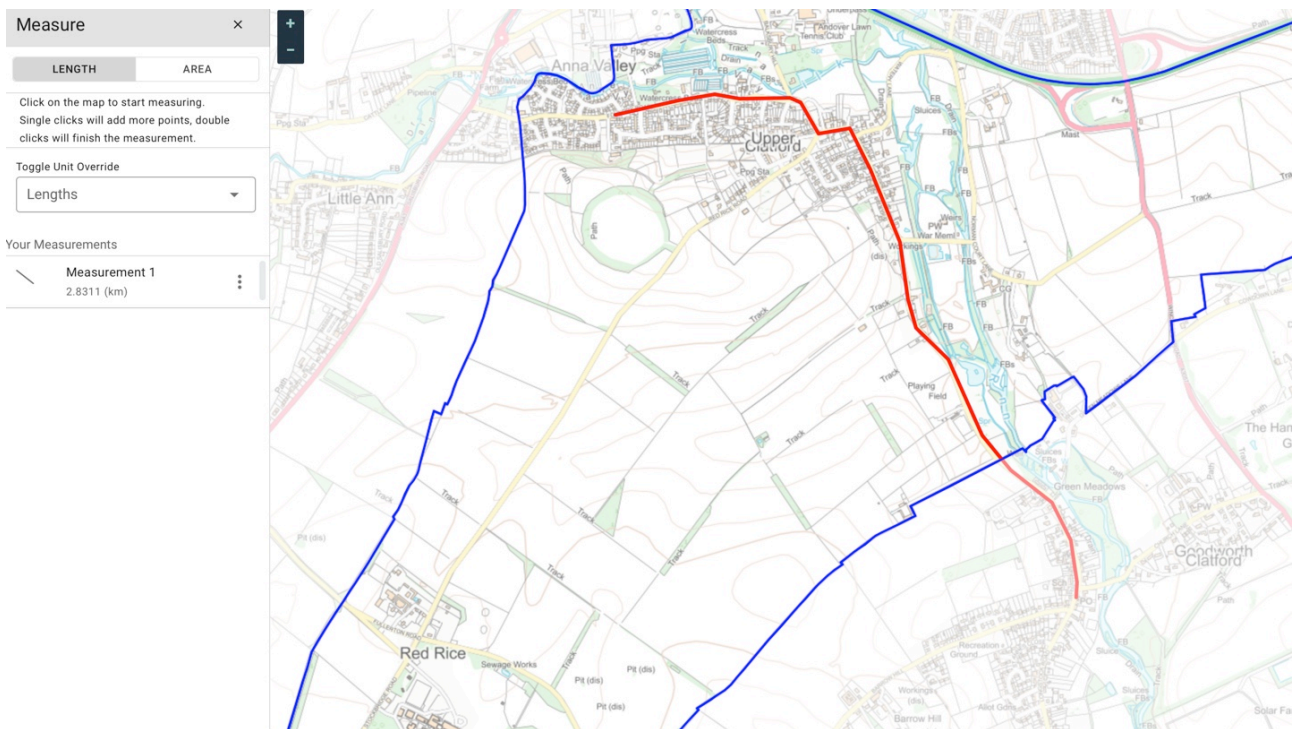


Longstock to Stockbridge, approximately 2.5km.













SIMILAR TO:

Anna Valley to Goodworth Clatford, 2.8km



Summary:

	Population c1650	Population c650
SUMMARY OF KEY FACILITIES	ANNA VALLEY AND UPPER CLATFORD	GOODWORTH CLATFORD
Food store		
Primary School		
Church		
Village hall		
Pub		
Playing field		

- The distance and safety aspects of the road between Goodworth Clatford and Upper Clatford does not permit sustainable access to Goodworth Clatford’s facilities, affecting sections of society without access to a car disproportionately.
- Growth predicated on car use does not conform with NPPF requirements that puts weight on development being located at places that can or are sustainable which offer public transport choices.
- Anna Valley and Upper Clatford should properly be placed in **tier 4**.

Infrastructure

Para 1.6 of the Local Plan 2040 refers to *the level of new homes, jobs and infrastructure to be provided to support the Borough’s communities and meet their future needs, whilst also protecting the local environment. This relates to both strategic issues, such as the amount of growth proposed, how it is distributed, and how the Borough moves towards achieving net zero carbon, through to more detailed issues, such as the design and layout of new development and how environmental assets are to be protected.*

UCPC support this approach, particularly the approach towards the protection of environmental assets. We are also supportive of paragraph 4.41 “*we will consider our approach to planning for the provision of appropriate future water supply and wastewater treatment capacity. This will ensure the necessary water infrastructure can be put in place, whilst ensuring the environment is protected and water quality is conserved.*”

The Pillhill Brook, a tributary of the River Test, and its corridor are particularly special environmental assets, a fact recognised by the recent award of SINC status. This was a UCPC initiative that we hope will be the first step in restoring this precious chalkstream to its former glory. However, the foul sewerage infrastructure in Upper Clatford/Anna Valley is already operating near (and in some areas beyond) its capacity. Intervention by Southern Water to use

road tankers to transport excess flow has been for several years a regular winter occurrence. They have recently installed facilities which will enable discharge directly into the Pillhill Brook when and if tankering is unable to cope. Adding further flow to an already inadequate sewerage infrastructure is not currently taken into account by TVBC when considering sites for development and an opportunity now exists for TVBC to assist with the restoration of the brook by implementation of para 4.103: *“New development places additional pressure on existing infrastructure therefore it needs to mitigate its impact. In other words, new development needs to contribute to providing greater capacity to existing infrastructure either through the delivery of new or enhancement to existing services and facilities”*.

UCPC are fully supportive of TVBC’s commitment to delivery of ‘greater capacity’ and ‘necessary water infrastructure’; stage 2 of the draft Local Plan 2040 should provide confirmation that future development will only be permitted where the wastewater generated has been assessed against the available wastewater infrastructure.

Footpath and cycle path infrastructure is also important in determining sites that are appropriate for development. UCPC therefore support para 92, which demonstrates a commitment to enabling and supporting healthy lifestyles, and para 112 which states that applications for development should give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas.

The draft Local Plan 2040 informs us that *“National data on carbon dioxide emissions indicates that the average emissions per person occurring in Test Valley are higher than the equivalent figures for Hampshire and England, particularly in relation to transport sources”*. It expands upon this by saying that *“the planning system has a role in promoting more sustainable travel, including through the location of new development and the infrastructure that is secured to support it. Therefore, it is also appropriate to be recognised within the strategic approach to climate change.”*

UCPC support an approach that prioritises sustainable transport when determining the suitability of sites for development; this is fully consistent with our comments regarding settlement tiers.

Local Green Space

1. Four areas of LGS were designated following adoption of the UC NDP in accordance with NPPF paras 98-103.
2. The draft Plan refers to Local Green Spaces as follows: *“we will need to consider the role of the Local Plan 2040 in designating Local Green Spaces which are areas that can only be designated in certain circumstances, including that they hold a particular local significance.”* UCPC understand this to mean that LGS will continue to be recognised by TVBC but the designation of new LGS using the Local Plan 2040 is currently undecided.
3. An LGS policy contributes to key Local Plan and NPPF policies regarding biodiversity, climate change, landscape and identity.

Sites

1. Although Regulation 18 Stage 2 will include detailed proposals for our site allocations, Upper Clatford Parish Council will seek to implement the objectives of the NDP in delivering the sustainable development of the Neighbourhood Area¹⁴ where these align with the draft Local Plan 2040. Of particular importance is the retention of a sense of village identity, achieved by avoiding sites that lead to coalescence with neighbouring settlements that include Andover and Goodworth Clatford.
2. Our NDP residents' survey revealed that 82% of respondents confirmed that protection and maintenance of the current settlement boundary was important (fairly and very).¹⁵
3. Planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:
 - a) Specific, deliverable sites for years 1-5 of the plan period; and
 - b) Specific, developable sites or broad locations for growth, for years 6-10 and where possible, for years 11-15 of the plan.¹⁶
4. UCPC produced a 'Housing Mix' evidence package that supported the compilation of policy UC3 of the NDP. This showed that Upper Clatford and Anna Valley had, at the time of writing, delivered 20 new build houses and 4 rebuilds - double the minimum requirement (averaging one new home per rural village per year) as laid out in COM1 of the current Local Plan. This achievement has occurred within the defined settlement boundary with no overspill into open countryside nor the Local Gap and UCPC believe that future development should continue in this vein.

Upper Clatford Parish Council, April 2022

¹⁴ NDP para 9.1

¹⁵ NDP para 7.5

¹⁶ Housing topic paper