

Goodworth Clatford Parish Council

Clerk to the Council
Mrs E M Attwood

07/04/2022

Planning Policy Department
Test Valley Borough Council
Andover
Hants

Draft Local Plan 2040 ("LP40")

Dear Sir/Madam

Goodworth Clatford residents have consistently shown strong interest in the future of their village and, in particular, in planning issues. It adopted its Village Design Statement ("VDS") as planning guidance in April 2000 and further to a referendum which was passed with a 95.2% approval our Neighbourhood Plan ("GCNP") was made on 12 March 2019. This was the first Neighbourhood Plan made in the TVBC area and the evidence base included the completion of a comprehensive questionnaire on all aspects of the village's future, for which the response rate was 88%.

It is therefore incredibly disappointing to us to see the result of a great deal of hard work and local democracy in action being potentially ignored by the proposals made in LP40. Not only do these proposals contradict the wishes expressed by such a large majority of the village but also run counter to the aims as expressed by TVBC in LP40 itself. In addition, the corporate plan for TVBC places great emphasis on empowering communities and having a community led approach to spatial planning which does not seem to have played a part in TVBC's LP40 proposal.

LP40 contains a number of inaccuracies and, because some of the premises on which TVBC bases its reasoning are inaccurate, its conclusions are not justified. In some cases, the statements made are fundamentally flawed. We have set out below the areas where TVBC has erred in its assessment and proposals, which result in LP40 being an unsound basis on which to proceed in respect of planning.

1. SHELAA

SHELAA sites are not an appropriate basis on which to base housing site availability. Whilst the Housing Topic Paper acknowledges that the sites promoted may not be suitable for future development, it also suggests that SHELAA sites give a clear indication of "range, location, geography and nature" which is particularly relevant at stage 2 of the consultation process. As is noted in the SHELAA itself, the information is based on submissions from agents and landowners, who have no connection or interest in the local community. Again, this is contrary to the LP40 to have a community led approach and should not be a basis for site allocation at Stage 2. This grouping is made up of, in many cases, developers who have an interest in submitting land that they have already been refused planning permission to build on, and on inflating the density of housing which could be built on the relevant site as it increases their profit.

Indeed, if one looks at the locations in the SHELAA in the Goodworth Clatford Parish this is illustrated clearly. All of the land submitted is outside the settlement boundary. However, even setting aside the settlement boundary issue in light of TVBC's lack of settlement boundary references in the LP40, significant matters were associated with some sites such as inadequate capacity in the existing local network to provide foul sewage disposal and a lack of means to drain surface water which had the potential to result in other existing properties being subject to increased flooding risk. One of the other sites suggested was used for dumping/landfill purposes and surely will require remediation given the potential contamination issues and adverse impact that may have on health were it to be built on. It therefore seems to us that basing the borough's site availability in reliance on these submissions cannot be justified and we struggle to understand how, in light of these problems, TVBC feels this reliance will be relevant at stage 2 of the consultation and drafting process.

2. Spatial Strategy Approach Options

In light of the inherent flaws in using the SHELAA sites to determine housing availability we feel that TVBC has too quickly dismissed the option of a new village in the spatial strategy. It seems to us that with a deficit for the period of just over 3,500 homes and the focus on sustainable development and cutting our emissions through minimising the impact development has on emissions, this dismissal out of hand with no further consideration when there was no firm opposition was not well reasoned and cannot be justified.

Since this Local Plan is to take TVBC through to 2040 and some of the housing supply is already being met then the reference to needs not being met in the shorter term makes little sense. Similarly, the argument against concentrating development at key transport hubs seems to us to be completely at odds with what TVBC suggests is its stated aims in LP40 at paragraph 2.26, "Climate change is one of the greatest challenges we face" and at paragraph 2.27, LP40 "will have an impact on cutting our emissions through minimising the impact development has on emissions...". It seems to us, as a result of the aims espoused by TVBC, the priority must be transport and siting sustainable development, where transport links provide a high level of public transport provision. To focus on facilities as listed in the villages makes no sense as they do not contribute to a reduction in private car journeys.

3. Grouping of Goodworth Clatford and Upper Clatford

The grouping of the above two parishes is based on inaccurate and incorrect data. It is not correct that the two parishes share a village shop. Upper Clatford/Anna Valley has its own village shop based on the definitions that TVBC has adopted as it has a farm shop, namely Greenfields Farm Shop. In fact, the shop at Anna Valley can be walked to safely along a pavement from Upper Clatford and is far closer than the one at Goodworth Clatford. As a result, Table 11 on page 20 of the Settlement Hierarchy Assessment should be amended and 'yes' should be substituted with a 'no'. This leaves only one shared facility which is the primary school. To rely on this as a reason for grouping the two parishes when there are other parishes and towns which use the school seems to us wholly lacking in any justification. It is very clear from the traffic which approaches the school from the A3057 that many come from further afield. This also ignores the fact that there will be limited residents for whom a primary school is relevant.

To be very clear residents from Upper Clatford have to travel more than half a mile to get to Goodworth Clatford and this journey has to happen by car as there is only a 40mph road with blind corners, no pavement or walking/cycling options. Whilst there is currently a Hampshire County Council school bus service, which provides a collection and drop off service from Anna Valley,

through Upper Clatford, to Goodworth Clatford Primary School, this is constantly threatened with being stopped by Hampshire County Council. Due to the time at which the journey to and from school occurs there is no other bus service, so all of these journeys would have to be by private car. To suggest that the villages are linked by the linear nature of the villages, notwithstanding the substantial separation detailed above, again seems to be wishful thinking as opposed to a premise based on valid reasoning.

Goodworth Clatford is self-contained with its own community, as is Upper Clatford and Anna Valley. A large degree of this separation is due to the physical separation between Goodworth Clatford and Upper Clatford. If, as paragraph 2.21 of the LP40 states, TVBC is serious about maintaining the character of our individual settlements then this grouping should not be supported. There is also inconsistency with the criteria for grouping villages, for example, Wherwell and Chilbolton are treated separately (quite rightly) but share facilities and a website. Why, therefore, are Goodworth Clatford and Upper Clatford grouped together?

4. Facilities

We do not believe that the focus on facilities is appropriate to differentiate rural settlements. As mentioned above if TVBC is truly focused on climate change and reducing private car journeys then focusing on the 'key' facilities is not going to have any impact, the focus should be on the high level of public transport.

We also question what TVBC has determined are core facilities. How can a place of worship be seen as a core facility and yet a doctor is not? Simply because the majority of villages have a church does not make it core. These are arbitrary choices without any evidentiary base underpinning them. Some are irrelevant to the majority of parishioners. Given the widely reported fact attendance at church is ever declining it seems strange to consider this a core facility. For example, in Goodworth Clatford a very small percentage of the residents attend church. This would suggest that it should not be treated as a core facility (it should also be noted that this is not multi-denominational but for Church of England). Whereas every single resident at some point in their lives will need to attend the doctors. The core facilities as adopted by the Local Plan 2016 are far more appropriate, they include a doctor's and not a church for example. The only reason we can see for the adjusted facilities is for TVBC to achieve a different development outcome as opposed to it being justifiable and evidence led.

TVBC also seems to be suggesting by its focus on a local shop that this will reduce the need for private car journeys. Whilst the village shop is a community asset, its use by villagers does not mean that people are not using private transport to shop in Andover, Salisbury or Winchester for example. Village shops by their very nature have to be subsidised to remain open, cannot stock a full range of goods and often run out of items residents might seek to purchase. Similarly, a playground or sports pitch has a much more limited use as it is primarily aimed at children and where the demographic is at the older end of the spectrum should not be seen as a core facility. We would also point out that there is a lot of what we consider 'double-counting' between core and other facilities. Some type of schooling/educational provision for example is seen 5 times. If the population of a village is made up of a more elderly demographic, then this focus is clearly flawed. Therefore, for these reasons we feel that as currently defined this is not appropriate. However, irrespective of the definition of facilities, we question whether this is even relevant. Outside of Andover, Romsey and potentially the Key Service Centres the pre-eminent factor for the promotion of sustainable development must surely be the level of transport provision in order to cut emissions.

5. Transport

If TVBC truly wants to promote sustainable development, then it must focus on availability of public transport. To develop in areas other than where the level of public transport is high is doing a disservice to this community in terms of the importance of getting to net zero carbon emissions.

The only level of public transport that will mean a private car journey can be avoided is one where there is a half hourly service which includes a journey to and from work or, using TVBC definitions, a 'high' level of service. To suggest that the 'medium' provision of public transport provision, namely one daily service is 'good' cannot be justified and will have no impact on private car journeys.

Goodworth Clatford has two services into Andover at around 9:23 and 12:23 am and then one return at 11:31am. (There are no services to other centres such as Salisbury, Winchester for items like clothing which are not provided in Andover.) Any reasonable person would not consider that this level of service provision is good. Indeed, if you look at the common dictionary definition of good it means 'of a high quality or level'. For TVBC to suggest that the service detailed above, that cannot be used for commuting to work, to get to the train station and even for a reasonable shopping trip, is good is not reasonable and in no way a justifiable assertion. In fact, it is this sort of statement that lends itself to the view that far from being an objective assessment TVBC has decided where it wishes to develop and has therefore tried to justify this approach with arguments which are not well reasoned and are clearly open to challenge as LP40 progresses through its stages. We therefore believe that this would not be considered sound as it would not meet the government test that LP40 has been positively prepared and justified.

This is separate to the fact that the Summary of Settlement Outcomes attached at Appendix 1 of LP40 and derived from the table in the topic paper on settlement hierarchy is lacking in both accuracy and transparency. There are a number of villages marked as 'L' with respect to transport provision, which have the same transport provision as Goodworth Clatford namely, Smannell, Vernham Dean, Barton Stacey to name a few and by virtue of TVBC's own flawed definition should be seen as 'M' with a 'good service'. The only other justification for 'good' transport links that Goodworth Clatford is asserted to have would be that by linking Goodworth Clatford to Upper Clatford and thereby Anna Valley we have access to the better Anna Valley bus service. That would be disingenuous as our residents would be required to walk along a 40mph road for part of their approximately one mile walk to Anna Valley to access this service. The poor state of public transport availability in Goodworth Clatford was borne out by our spot survey which showed that the overwhelming majority of our residents never used the bus.

We agree that the dispersal of growth to all parishes is not a viable option due to the transport issues. However, we also think that any development should be focused where there is high transport provision and as such the proposed tiering of villages is flawed. It makes no sense for villages with high levels of transport provision to be in a lower tier than those with medium provision especially on the basis of 'core facilities'. As we have demonstrated above, those facilities deemed core will not in any way remove the need to make journeys and the only way to positively impact emissions and the green agenda is to ensure that those journeys happen by public transport.

6. Lack of Settlement Boundaries

The TVBC policy of introducing Settlement Boundaries in the 2006 Local Plan reinforced, for Goodworth Clatford, the clear distinction between the built environment and the surrounding landscape. In order to, according to the NPPF, conserve and enhance the historic environment we should "recognise the intrinsic character and beauty of the countryside" which we believe

underscores the importance of the retention of the settlement boundary. The only reason for removing the concept is to enable development wherever TVBC (and potentially unscrupulous developers) wish. There must be some red lines on development so how are these to be defined? To discard this concept so easily seems to be a waste of money and resource which in these straitened times should be resisted. By removing these constraints, we could easily see in Goodworth Clatford flooding impacts contrary to paragraph 159 of the NPPF which states that developing “..... in areas at risk of flooding should be avoided by directing development away from areas of highest risk”.

The settlement boundary concept has not resulted in a lack of development in rural villages. Indeed, the Local Plan sought to find thirty-six dwellings a year from the rural villages (about one house per year per village). Goodworth Clatford has so far added a net gain of dwellings from windfall sites within the settled area. In the GCNP questionnaire, the majority of electors in the village supported an increase of between ten and fifteen dwellings over the relevant plan period.

7. Local Gaps, Rural Gaps and Local Green Spaces

The suggestion by TVBC in LP40 seems to be urban sprawl from Andover should be pursued at the expense of the rural way of life in the villages. It calls into question the local gap between Andover and Upper Clatford, it treats Upper Clatford and Goodworth Clatford as a group thereby paving the way for development between the two separate villages. This would be, without question, a significant extension to an existing village and as such, we note that were this to be the direction of travel then TVBC must, according to the NPPF, publish its 30 year vision (paragraph 22, “Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.” As far as we are aware, this has not been presented alongside the LP40 by TVBC.

LP40 conveniently glosses over other strategic policies contained in the NPPF, namely, the conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure. In the GCNP it designated a number of green spaces in the community as special to the village (and in accordance with the tests set out in the NPPF) in order to promote the health and wellbeing of communities. TVBC have not yet committed to retaining local green spaces in LP40, and the commentary in LP40 does not inspire confidence, despite the discussion in the NPPF.

TVBC also seems to have paid scant regard to its own Character Appraisal of Goodworth Clatford and Upper Clatford conservation areas. This states “The area between Goodworth Clatford and Upper Clatford incorporates the open valley bottom and recreation ground is particularly important in retaining a visual separation between the two communities. These open areas also contribute towards the historic setting of the two conservation areas.” It goes on to state that “...careful consideration should be given to the likely impact of development on the edge or immediately outside of conservation area boundaries as this can have a detrimental impact on views into and out of the conservation areas. These features all combine to reinforce the rural character of the two villages and are worthy of preservation and enhancement. It is important that their significance is understood and taken into account when future development is considered. “

It seems to us that if the vision of TVBC in LP40 is that the character of our individual settlements will be maintained and their sense of place enhanced then that, in and of itself, is adequate justification for local gaps. Without these there is concern individual settlements cannot be maintained but will

bleed into larger conurbations by the imposition of wholly disproportionate development contrary to LP40's stated aims.

8. Brownfield Sites

One element of LP40 which is conspicuous by its absence, especially when it is discussed throughout the NPPF, is the lack of mention of development on brownfield or vacant sites. There is land that can be converted or redeveloped for housing. We would suggest that this should be given first priority to meet the housing demand. We would also argue that the conversion of farmland to housing would be a short-sighted approach to housing development. To take the climate challenge seriously we need to be considering our self-sufficiency not transporting lorry loads of foodstuffs from the continent, whilst building over our agricultural land.

Conclusion

In conclusion, Goodworth Clatford and its parishioners are not against development and the GCNP clearly recognises this is incorporated within the settlement boundary. As a parish we support proportionate village development which will not destroy the community spirit and cohesion that comes from being a small and tight knit community, nor overwhelm our limited facilities. We believe it is important to retain our green spaces which are used not just by Goodworth Clatford but also by the residents of Andover and other communities to walk their dogs and generally enjoy nature. As TVBC says in LP40 that it wishes to promote 'cohesive and healthy communities' we would urge TVBC to justify that statement. Currently, LP40 is a charter for building over green spaces, increasing private car journeys for more people and as a result negatively impacting the landscape and contributing adversely to emissions.

There are many instances where the LP40 appears to have been built around a view as to where development should occur as opposed to it being evidence based and objectively led. We would therefore encourage TVBC to reconsider its approach in light of the issues we have raised in our consultation response.

Kind regards.

Your faithfully,


Eveline Attwood

Clerk to the Council

Goodworth Clatford Parish Council

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