

Dear Sirs,

You have invited comment on the Draft issue of the Test Valley Local Plan 2040 which is, in my opinion, worrying in its current form for a number of reasons.

### **1) Settlement Boundaries**

With reference to Section 4.7 of the Spatial Strategy Topic Paper, and its accompanying explanation at Appendix 1: there seems to be an inconsistency between the statement that *“Option F is not an appropriate and sustainable option to take forward.”* and the main body of the Draft Local Plan which, by omission, makes allowance for Option F to be pursued. By that I mean the omission of any references to Settlement Boundaries.

TVBC has, entirely reasonably, spent untold millions over the past ten years carefully capturing and mapping the settlement boundaries of all towns and villages, and yet now it seems that all this effort is to be discarded, since there is no mention anywhere in the Draft Local Plan of settlement boundaries, in the way in which there was in policy COM2 of the previous issue of the Local Plan.

Is the electorate of Test Valley therefore to understand that all the time and effort spent in defining the settlement boundaries may now be undermined? If so, what policy guidelines will replace the settlement boundaries, or is development simply to become a free for all? Sadly, one senses the hand of local developers at play here.

It is noted that with in the Statement of Consultation Appendix 2: Refined Issues and Options Schedule of Comments, amongst the Officer Responses there frequently occurs the phrase *“The way in which settlement boundaries are defined and the criteria used to define them such as residential curtilages, will be detailed further at Regulation 18, Stage 2 taking into account a range of factors”*.

However, the fact that settlement boundaries do not get a mention in the Stage 1 document is concerning, as is any explanation of what might be the “range of factors”, and I am concerned that it might reasonably be argued at law that it is not appropriate for a council to suddenly introduce at Stage 2 something of which they made no mention at Stage 1, and on which they have therefore not consulted.

Surely it is essential for the main body of the Stage 1 Draft Local Plan document to explicitly establish the principles which will ensure that Option F is not taken forward? Not to do so is concerning.

### **2) Deletion of the Local Gap between Andover and Upper Clatford/Anna Valley as defined in Policy E3 of the Current Local Plan.**

The long held principle of the Local Gap appears to have been quietly dropped by TVBC for no apparent reason, other perhaps that much of the land which forms part of that gap has been acquired by a local developer/builder.

Notwithstanding the issue of commercial interest, development of the gap area will undoubtedly have an impact on the potential for flooding in Goodworth Clatford, which if not addressed, will be contrary to Para 159 et seq of the National Planning Policy Framework.

### **3) Desire of TVBC to Merge Upper Clatford and Goodworth Clatford for Planning Purposes.**

The justification for this merging seems to be that many resources are shared between the residents, albeit with no evidence forthcoming from TVBC in support of this claim.

There is no factual nor historic basis for classing Upper Clatford and Goodworth Clatford as a “grouped settlement”.

As it currently stands, using the consideration of ‘key facilities’, Upper Clatford has a specialist shop, no post office, and a pub which is for sale and likely to close if no buyer is found. It does not benefit from a good standard of public transport, nor does it have a school.

TVBC’s claim that the two villages “share facilities” is unfounded: Upper Clatford has its own church and village hall, its own playground, and the shops in Andover (especially Hexagon Store) are closer than Goodworth Clatford. Thus it is only the School which is shared.

It is therefore preposterous to consider it in the same way as Goodworth Clatford unless by merging them TVBC is trying by stealth to justify a strip infill along the road between the two villages, and then subsequent enlargement into a much bigger settlement, in a way which would have been explicitly contrary to the contents of Page 115 of the current Local Plan.

### **4) Placement of Goodworth Clatford in Tier 3 of the Settlement Hierarchy Assessment (SHA).**

Section 4.12 of the Settlement Hierarchy Assessment, under the heading “Tier 3 and 4 Settlements”, says *“Using the six key facilities plus a good level of public transport, provides a reasonable basis to distinguish between the sustainability of the rural settlements in the current hierarchy”*.

This makes perfect sense, however its application to my village is utterly flawed. Table 10 of that Settlement Hierarchy makes the statement that “a daily service to a larger Town” constitutes a “Good Service”.

I appreciate that what constitutes a “good level of public transport” facilities is a subjective judgement, but I cannot believe that anyone can keep a straight face whilst claiming that Goodworth Clatford benefits “from a good level of public transport”.

There are two buses a day from Goodworth Clatford to Andover at 09:23 (arriving 09:40) and 12:23 (arriving 12:40) and one bus a day from Andover to Goodworth Clatford departing Andover at 11:15.

That means that unless one wishes to make an overnight stay in Andover, it is possible to spend only one hour and thirty five minutes in Andover on any given day.

Whilst this might technically meet the criteria of a “daily service”, it is not realistically usable for anything other than a quick shopping trip: none of the bus times make it feasible to travel to and from Andover for work, and neither is there any provision for travel to the railway station.

Moreover, even though the bus route passes the warden assisted housing development for the elderly at St Peter’s Close in Goodworth Clatford, the public bus service is so poor that the residents are faced with no alternative but to pay for their own private mini-bus to make trips to Andover.

Thus, I believe that TVBC cannot legitimately claim that Goodworth Clatford has a “good level of public transport”, indeed to continue to do so would invite legal challenge, and on that basis, the village of Goodworth Clatford should be treated on its own merits as being in Tier 4, rather than Tier 3 of the settlement hierarchy.

## **5) Failure to Adhere to National Planning Policy Framework**

National Planning Policy Framework (Page 9 Para 22) says that *“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.”*

Removal of the gap between Andover and Upper Clatford, and the attempt to merge the two Clatfords and strip develop between them would jointly and severally constitute a “significant extension”, as described above, and yet TVBC has failed to publish the required 30 year vision.

Therefore to be compliant with the National Planning Policy Framework, TVBC should either publish its 30 year vision, or make it quite clear that it intends to retain the gaps between Andover and Upper Clatford, and between Upper Clatford and Goodworth Clatford.

## **6) Omission of References to Settlement Boundaries**

TVBC has, entirely reasonably, spent millions of pounds over the past ten years carefully capturing and mapping the settlement boundaries of all towns and villages, and yet now it seems that all this effort is to be discarded, since there is no mention anywhere in the Draft Local Plan of settlement boundaries, in the way in which there was in policy COM 2 of the previous issue of the Local Plan.

It is noted that within the Statement of Consultation Appendix 2: Refined Issues and Options Schedule of Comments, amongst the Officer Responses there frequently occurs the phrase “The way in which settlement boundaries are defined and the criteria used to define them such as residential curtilages, will be detailed further at Regulation 18, Stage 2 taking into account a range of factors”.

However, the fact that settlement boundaries do not get a mention in Stage 1 is concerning, and I am fearful that it might reasonably be argued at law that it is not appropriate for a council to introduce at Stage 2 something which they made no mention of at Stage 1.

Is the electorate of Test Valley therefore to understand that all the time and effort is simply being cast aside? If so, what policy guidelines will replace the settlement boundaries, or is development simply to become a free for all? Again one senses the hand of local developers at play here.

## **7) Flooding**

National Planning Policy Framework (Page 46 Para 159 et seq) discusses Planning and Flood Risk, and yet nowhere has TVBC addressed the matter in specific detail: instead its Draft Local Plan covers the subject in general leaving many gaps which can, and will undoubtedly, be exploited. Section 4 of the Draft Local Plan mention the risk of flooding, but fails to address how development will or could be strictly controlled within the flood plain, to lessen the risk.

## **Summary**

This Draft Local Plan is more notable for what it omits than what it contains. It seems that it has been drawn up to satisfy the demands of developers at the expense of local people in rural communities.

For the reasons above, many of which are objectively measurable, I believe that the Draft Local Plan in its current form would not survive a legal challenge, and should therefore be re-written in order to avoid TVBC becoming embroiled in a costly (to the taxpayer) and unnecessary battle.

Yours sincerely

**Richard GREEN**

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