

Dear Test Valley Planners,

Many thanks for sharing the proposed future local plan. It is good to see the council planning *so far ahead* in order to meet future housing requirements, however in order for the planning to be really effective and optimal I think it is important that as many factors are taken account of as possible to ensure that future development is placed in the right location and with the right support and infrastructure in place and with full consideration of its future sustainability. The categorisation of settlements into tiers seems to be the key basis upon which development potential is being assessed, I would therefore like to raise a number of points which I feel should be taken into consideration by you as the LPA, in order for the categorisation and thus the plan to be sound. My focus is largely in relation to Upper Clatford since that is the location I live in and thus have knowledge of, and which leads me to question whether the categorisation of Upper Clatford is appropriate.

**Ability to access schools and shop:**

There is no pathway between the two 'separate' villages, the road is rural, with poor visibility because of bends and unrestricted in terms of speed therefore highly dangerous to walk along. In the winter with short daylight hours the danger is greater.

There is no safe cycle pathway between the villages, cycling on the road is more dangerous than walking, especially in the winter, due to the speed of vehicles the road narrowness and the bends in the road - all aspects of a rural location and the poor standards of the road. The edges of the roads are such that as a cyclist you need to stay well away which places you in even greater danger with the motorised traffic. With walking you are able to jump out of the way, provided you aren't pushing a pram or wheelchair, with cycling there is no opportunity. This is a high risk activity and runs contrary to the advice in the NPPF saying that planning should aim to achieve healthy, *safe* and inclusive places.

The nature of high street in Upper Clatford and Goodworth Clatford adds to the risk factors - both are narrow with many parked cars making cycling hazardous in the actual village locations themselves.

Within Upper Clatford alone there are a number of locations where the pavement does not exist requiring the pedestrian to move into the road.

The assumption that the school and shop are easily accessible needs to be tested in terms of impact on those with protected characteristics, in terms of your equality duty has there been a full review?

The bus service connecting the villages or indeed the village to Andover is so infrequent as to be completely unviable as an effective means of transport to meet work, schooling or any domestic needs. Moreover the bus service is not fit for those with a disability, for example wheelchair access is pretty much impossible assuming you could get to the bus top by wheelchair to begin with. In short the current provision does not represent a '*genuine* choice of transport modes' (NPPF para.73) For people in Upper Clatford there is only one genuine choice which is by car to access all needs.

The school in Goodworth Clatford seems to have been regarded as an Upper Clatford asset - this takes no account of the current admission procedures to schools. I myself as a resident of Upper Clatford was unable to get a place for my child in this school due to the school being full. Your planning seems to be based on people being in the location prior to the commencement of registration for school places in the reception years which is only going to be likely in a few cases.

Given that the school is already unable to meet local schooling needs, how is it expected to meet the needs of yet more people moving in to the location bearing in mind the school is on a severely constrained site and therefore not able to expand?

With travel between the two separate villages being dependant on journeying by car is this sustainable or appropriate planning for the future ?

Why is there no consideration of education beyond primary level? Are the local schools in Winchester, and Andover sufficiently resourced to meet future growth and what about the transport to these schools?

The dependancy on tiny expensive local shops is unviable for those on low incomes - if there is no dependency on these shops why are they sufficient to place a village in a different tier with more development potential? Therefore you are basing the provision of development on a facility that will not necessarily be affordable.

Is it appropriate to have a local plan to 2040 based on the provision of tiny village shops both of which hover on the unviable? There is no guarantee of this future provision and indications are that either one or other will not survive without external funding. The shop in Goodworth Clatford is run on a volunteer basis, it is therefore in constant danger of being closed due to lack of 'volunteers' how can this be the basis of a tier grading that will impact the village into the future? This is surely unsound? Similarly the very small farm shop in Upper Clatford was on the verge of collapse and cannot be considered a viable future facility. Noting that the previous post office and shop which was in Anna Valley closed due to unviability - this is despite growth in the community. Larger communities does not bring viability, ready volunteers for shops or customers - especially when the shop is niche like a farm shop .

### **Medical Provision:**

I would also like to understand why medical provision is not a consideration? There are no medical surgeries in either village - with villagers having to travel to Andover or Stockbridge for their first line care. The provision of NHS dentists is non-existent as well and the nearest available in Andover is not sufficient

None of the potential development sites are sufficient in size to warrant provision of a new surgery in terms of levy's on builders. I would hazard a guess that the Andover surgeries are already at breaking point in terms of numbers.

I would also like to understand what genuine, evidence based, consideration there has been regarding access to medical help via public transport. A visit to the doctors for example based upon a bus that runs once or twice a day is not really a viable means of transport, even if it did run near to the surgery that the individual was registered with. Moreover access to the hospital, is there an assumed reliance on 'patient transport' and can this funding be guaranteed into 2040 and beyond? Given the demise of so many soft services like transport it is realistic to question this.

### **Infrastructure:**

The current infrastructure below the ground is already insufficient to meet the needs of the existing community. Without significant infrastructure planned for and funded regarding drainage and

sewerage it would be negligent to allow any more development in this location. We have already been subject to raw sewage being pushed into the chalk streams so this is not a risk but a real issue which needs to be taken account of in terms locations which are suitable for further development.

There is also a known shortage of water supply in the area, which also poses a threat to the chalk streams. What plans are there to secure sufficient supply to sustain these new developments into 2040 and beyond given the clear evidence of climate change?

Electrical infrastructure is another for consideration. With no clear plan for future provision evident to sustain further development in the location of Upper Clatford. With future change to more electric dependency and the move away from gas (which will be banned in the near future) together with current requirements for electric charging facilities for cars in new housing there must be upfront consideration of how this electricity will be supplied in these rural locations to meet this demand. The majority of houses in Upper Clatford are supplied via overhead cabling a very old and limited form of supply means which is subject to fairly frequent disruption. Has there been any consideration of the capacity of the sub-stations to meet extra demand of the level being assumed? What funding is in place for the future to meet the increased demand?

The current transport provision is not sufficient to support the current community, as noted above, the bus service is unviable to support social, or economic objectives and does not form a 'genuine' option of transport. Future growth in this community cannot therefore be classed as sustainable without evidence of a clear strategy or policy to provide improved and funded transport services into the future alongside the plan. Alongside the need for improved public transport options and in order to provide the *genuine choice* referenced in the NPPF there must also be full consideration of the need for safe cycle lanes and pavements together with improved roads. Upper Clatford has limited pavements, and the roads are narrow and not suitable for increased traffic flow, furthermore there were no plans for cycle paths to be provided which would provide choice.

The plans for development in Upper Clatford seem to be based upon the premise that the future occupants will drive a car or never leave their homes or that they are completely able bodied and happy to walk or cycle along dangerous roads. This seems to disregard the public sector equality duty that should be adhered to and is also out of gear with the UN Sustainability Goals which the UK has signed up to which require us to 'bike, walk or take public transport'.

### **Environment:**

Village life is a precious and shrinking commodity which needs protecting, it is one which is enjoyed not just by the people who come to live in the village but by those who visit and *walk* to the village from Andover. Upper Clatford is a popular location to walk to by the residents of Andover. Many people make use of the old railway pathway to walk to the village and come to a location that is pretty to be at. Intensification and urbanisation of the village will destroy an amenity that people enjoy and the identity will be lost forever and would run contrary to the NPPF policy which recognises the need to enable and support healthy lifestyles.

The NPPF asks that rural areas should be provided with development that enhances and maintains the vitality of rural communities - if Upper Clatford were to grow disproportionately and certainly to the extent of losing its individual identity the village by losing the green zone around it - where would the enhancement be?

The greenspace around Upper Clatford serves a vital function, not only as a green lung helping to absorb some of the harmful emissions from the A303 traffic, and absorb noise pollution, it also provides a visual break for those on both sides of the A303.

In line with the NPPF should there be consideration of the development of a protected green belt around Andover, especially to counteract the increased traffic and harmful effect of the A303?

It is vital to maintain village identity, gaps between villages are part of maintaining that identity and also provide the green lungs for those in the more urban spaces. People have real identity with their village, it gives a sense of belonging. It is paramount that physical aspects are retained to keep the identity and a road sign is not enough. The 'village' of Charlton is a good example of having completely lost its village identity. It is barely identifiable as a 'village' but for a road sign. I would suggest not many people in central Andover would want to walk to and enjoy Charlton anymore.

Hampshire's identity is another key factor, when Hampshire is promoted it is with images of the chalk streams, the trout fishing, the rurality - people want to visit and move to these locations for a good life and a good experience not to live and see homogenous mounds with no identity and just to be left with tiny glimpses of what village life might have been like. Eroding villages in Hampshire will be to the detriment of everyone and benefit of few.

The historical aspect of this village and wider area is swiftly in danger of being lost, the protection of its heritage should be uppermost or there will be nothing remaining for future generations. Andover has lost so much of its heritage, which is too late to preserve, there should be a priority therefore to assess the local heritage surrounding Andover and ensure it is protected. In Upper Clatford historic water meadows are being lost and with them their unique bio-diversity. The watercress beds are also a unique and valued part of the local history and identity. Without protection of the area and particularly the integrity of the chalk streams this part of our heritage will also be in danger. The historic hill fort could end up completely lost in context if the surrounding countryside is not fully retained. Noting that one of the potential intended sites for 'permitting' development is in close proximity to the hill fort and also contains historic roman remains which would be completely lost.

The bio-diversity of the sites needs to be considered - the longer a piece of land has remained undisturbed the greater the bio-diversity. The Environment Act will provide the requirement for bio-diversity net gain but it won't protect what is there already and it is hard to understand how certain special aspects will ever be replicated in the net gain provisions - albeit that is beyond your control. However given that there will be huge need for land for bio-diversity net gain and other natural capital aspects should you not be forward thinking and considering what sites would be better in terms of their bio-diversity for retention and not building on? Doesn't the NPPF reference the need to consider 'scope for net environmental gains' ? Arguably by choosing areas of potentially high bio-diversity for development you are potentially making it very difficult for developers to develop the land economically.

#### **New Legislation:**

As a general point - I am curious as to how the local plan will be impacted by the future planning legislation that is in the pipeline. We know the planning white paper came up with a number of big changes and that we await the next version from DLUHC which is being actively worked on by the department at the moment. Knowing that there are significant changes in the pipeline what's the expected longevity of this plan in real terms? Is it appropriate to be making such a plan and investing

time and money on it at this stage? Why is there a desire to set a plan for 2040 rather than conducting a review of the existing one?

**In summary:**

Effective planning needs to take account of all factors, not just some, in order for it to achieve truly sustainable development. Any plan should also be underpinned by evidence, up to date and relevant information. Whilst I feel the draft plan is a step in the right direction I feel there is also a significant number of wider factors, evidence and information, as mentioned above, that needs to be brought into consideration in order for the plan to present a sustainable pathway for the future.

One overriding aspect which I would also like to draw out is the lack of inclusivity and diversity in terms of welcoming all people in the community, particularly elderly and disabled - tiers seem to be largely predicated on the community being healthy, young, with children, jobs and transport. I would also feel quite alienated in cultural terms with no serious thought for other religions for example in assessing tiers. Without a serious consideration of the needs of the whole community when assessing where best to place developments how can a plan be sound?

Apologies for the length of this - i do hope the above will be useful in helping you deliver a revised plan with a greater focus on sustainable development.

Regards,

Karin Bennett

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