

Comments on Test Valley BC Draft Local Plan 2040 Reg 18 Stage 1

I have lived, with my family, in rural Northern Test Valley for over 40 years. We operate a small family run house building company and our work is almost exclusively within the Test Valley.

In reviewing the Draft Local Plan 2040, only at Chapter 3 does the request for consultation set out what is being consulted on (Settlement Hierarchy). All other Chapters are rather vaguely “*seeking comments on this policy*” with detail to be consulted at Stage 2. Is the focus on Settlement Hierarchy deliberate? If so, what is the justification for this approach?

Document – Draft Local Plan 2040 Reg 18 Stage 1 (Feb 2022)		
Paragraph	DLP Next Steps	Comments
3.36	Whether the identification of existing facilities and services is accurate and up to date, particularly from Parish Councils.	<ul style="list-style-type: none"> • As Reg 18 Stage 1 focuses “<i>solely on strategic matters</i>” it follows that Reg 18 Stage 2 would be the more appropriate time to confirm the accuracy or otherwise of the assessment, this would also make the assessment more up to date when the LP is adopted. • In this day and age, with the vast amount of data and information readily available, the assessment of facilities in settlements need not be binary. Would it be more appropriate to include a tally of the number of each facility available to give a truer picture of each settlement? Any employment within settlements could be counted by number of ‘job spaces’. • The assessment for Place of worship is not inclusive, it does not provide for a diversity of religions. In practice the “market” of the Test Valley dictates that places of worship in the borough are almost entirely (if not entirely) churches so shouldn’t the description be more open, instead of ‘place of worship’ should it read ‘church’?
	Feedback on whether the use of the 6 key facilities and levels of public	<ul style="list-style-type: none"> • Creating a single document that attempts to cover both, rural areas and the urban centres of Andover and Romsey, fails to recognise the importance of the differences between the rural and

	<p>transport service are appropriate to differentiate our rural settlements in the hierarchy</p>	<p>urban settlements. The overarching issue is that rural areas and settlements are so drastically different to the urban centres of Andover and Romsey, is it really appropriate to consider these two entirely different elements in a single document? Should rural areas and settlements be considered under a separate SPD?</p> <ul style="list-style-type: none"> • Settlement Hierarchy Assessment paragraph 3.5 (page 6) <i>“This was then supplemented by a judgement on the role and function of settlements”</i>. The word <i>“judgement”</i> implies a subjective decision being involved. The assessment should be objective. Whose judgement? Where can the procedural documents relating to these judgements be found? What did they conclude? • Why does the Local Plan give so much weight to Public Transport? Is there data to support this approach? Usage levels of Public Transport particularly in rural areas has been falling consistently to a point where in 2020 less than 1% of work journeys in the vast majority of rural Test Valley used a bus (source: Hampshire Bus Service Improvement Plan – Fig 8 (ONS 2020)). One only has to observe the use of buses in rural Test Valley (and Test Valley is not alone) where a significant proportion of buses operate with very low passenger numbers, even empty, how does this fit with environmental policies of the DLP? How can running empty diesel buses be justified in this time of climate concern? • Conversely, reliance on Superfast or even Ultrafast broadband is ever increasing. The Local Plan should be more ‘forward looking’ in terms of broadband connectivity, this has been brought into very sharp focus over the last two years with unprecedented demand for rural homes with good internet connection. Along with mains electricity and running water, superfast broadband is considered an essential utility by homeowners and businesses and the policies of the DLP should reflect this. Test Valley was part of a 2019 pilot programme to roll out full fibre broadband to rural areas and as a result rural homes and business in a significant part of the Borough benefit from ultrafast broadband with speeds upto 300Mbs. As such, significant parts of the rural areas of the Borough benefit from advanced, high quality and reliable communications infrastructure and these areas are more sustainable than otherwise might be the case. This is a long term plan, more weight should be given now to those areas with advanced, high quality and reliable
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		<p>communications infrastructure. Should Superfast broadband be given equal or more weight than public transport in the facilities assessment?</p>
	<p>Feedback on how we have assessed settlements that can access services and facilities available in a nearby settlement due to their proximity.</p>	<ul style="list-style-type: none"> • It is correct that settlements which are intrinsically linked should be grouped, these settlements can and do support each other. It is also true that development in one settlement can improve the sustainability of facilities in adjoining settlements. • If Major Centres can be accessed from surrounding settlements by walking or bicycle, reducing the reliance on a car journey or even bus journey, then perhaps greater sustainability weight should be placed on those settlements. Those settlements that are geographically closer to Major Centres are, by the measures set out in the assessment criteria, more sustainable. Distances from settlements to Major Centres can easily be assessed and recorded in a table where the length of journeys can be quantified. Clarity of plan making can then be shown. • A number of very rural settlements (proposed Tier 5) have been included in this 2040 DLP which are not included in the current DLP, including, East Tytherley, Ashley, Little Somborne, etc. There are other settlements in the borough which are at least equal in terms of facilities that should warrant inclusion, such as, Horsebridge and Kentsboro, etc. If Tier 5 settlements are not listed in the DLP why have some been listed in the SHA? Why list any of the Tier 5 settlements at all if they are all to be included under 'Countryside'?

Document - Settlement Hierarchy Assessment (Feb 2022)			
Paragraph	Extract/Item	Comment	Result/Suggestion/Question
3.1 – 3.6	Bullets 3.1 through 3.6, numbers only are duplicated, the content is not	My comments below refer to the bullet points as they are listed in the current draft version (February 2022)	Amend bullet points
3.1 (page 6)	“choosing criteria to assess sustainable locations is not a precise science”	Agree, but a criteria has been set for assessment.	Therefore the assessment should be as accurate as possible against the set criteria.
3.4 (page 7)		Implies that Andover is located in an adjacent borough, which obviously it is not.	
3.8	the assessment has also assessed the role and function of settlements	Where can this assessment of the role and function of settlements be found? What did it conclude?	Was the assessment objective? What was the criteria?
Table 11	“...for example both villages...”	“both” implies two.	What about the groups with more than two settlements?
Table 11	‘No’ - not shared facilities, ie. each village has its own.	If each of the shared villages has their own facilities then those settlements, by definition, are more sustainable.	What is the purpose of recording whether the grouped villages have shared facilities?
Table 12	Public Transport*	There is an asterisk on Public Transport.	There is no note to explain the reason for the asterisk? What does it represent?