



Planning Policy

Test Valley Borough Council

Draft Local Plan 2040 (“LP40”)

I write with reference to the proposed local plan, LP40, prepared by Test Valley Borough Council (“TVBC”). As a resident of a village which made its Neighbourhood Plan (“GCNP”) just three years ago it is disappointing to see the work involved in its creation being potentially overridden by the proposals in LP40. These proposals contradict the wishes expressed by my village and also run counter to the aims as expressed by TVBC in LP40 itself. Despite the TVBC corporate plan emphasising a community led approach to spatial planning this does not seem to have played any role in TVBC’s LP40 proposal. This approach should not be discharged simply by sending it out to residents of TVBC at Stage 1 but should involve looking at the already made neighbourhood plans and considering their content.

1. SHELAA

SHELAA sites are not an appropriate basis on which to base housing site availability. The information is based on submissions from agents and landowners, who have no connection or interest in the local community. This is contrary to a community led approach and should not be a basis for site allocation at Stage 2.

The locations in the SHELAA in the Goodworth Clatford Parish are all outside the settlement boundary. This grouping appears to be comprised of developers who have an interest in submitting land that they have already been refused planning permission to build on and inflate the density of housing which could be built to maximise their profit. Not only are these outside the settlement boundaries but some 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. In addition, another site was used for dumping/landfill purposes which one would have thought will require some sort of remediation to make this suitable for housing. As a result, reliance on these submissions seems unjustified.

2. Lack of Settlement Boundaries

In order to, according to the NPPF, conserve and enhance the historic environment we should “recognise the intrinsic character and beauty of the countryside” this, I 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 developers) choose. Surely, there must be some red lines on development? How are these to be defined without any reference to settlement boundaries? To discard this concept so easily seems to be a waste of money and resource and could easily result in adverse flooding impact in Goodworth Clatford 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”.

Goodworth Clatford has so far added a net gain of dwellings within the settled area so it is clear that the concept of a settlement boundary has not resulted in a lack of development in rural villages.

3. Local Gaps and Local Green Spaces

The only interpretation of what has been put forward by TVBC in LP40 seems to be that urban sprawl from Andover should be pursued irrespective of the wishes of rural 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, 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.” This does not appear to have been presented with LP40.

Where are the references to the conservation and enhancement of the natural, built and historic environment, including landscapes in LP40? The GCNP 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. Are these to be discarded?

LP40 does not seem to have considered the content of TVBC’s own Character Appraisal of Goodworth Clatford and Upper Clatford conservation areas where it 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.” And suggests that careful consideration needs to be given to the impact of development “...on the edge or immediately outside of conservation area boundaries” as all of these features “...combine to reinforce the rural character of the two villages and are worthy of preservation and enhancement.” It further states that their significance needs to be understood “...and taken into account when future development is considered. “

The retention of local gaps supports the vision of TVBC in LP40, namely that the character of our individual settlements will be maintained, and their sense of place enhanced. Without these gaps, I am exceedingly concerned that individual settlements cannot be maintained but will be swallowed up by larger towns through disproportionate development contrary to LP40’s stated aims.

4. Spatial Strategy Approach Options

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, why was a new village not given more focus? There were arguments on each side so TVBC’s dismissal seems unjustified. The reference to needs not being met in the shorter term makes little sense, this is a plan that extends out to 2040, almost twenty more years.

Similarly, the argument against concentrating development at key transport hubs seems to be in conflict with what TVBC suggests is its stated aim 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...”. Given 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.

5. Grouping of Goodworth Clatford and Upper Clatford

The grouping of the above two parishes is based on inaccurate and incorrect data, the two parishes do not share a village shop. Upper Clatford/Anna Valley has its own village shop based on the definitions that TVBC has adopted, 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. Therefore, corrections must be made to Table 11 on page 20 of the Settlement Hierarchy Assessment by substituting 'yes' 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 also irrelevant for a great many residents like myself.

To suggest that the villages are linked by the linear nature of the villages, notwithstanding the substantial separation, more than half a mile to get to Goodworth Clatford on a 40mph road with blind corners, no pavement or walking/cycling options, 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 must be discarded as inappropriate and contrary to LP40 aims. There is also inconsistency with the criteria for grouping villages, for example, Wherwell and Chilbolton are treated separately (as they should be) but share facilities and a website. What is the justification for treating Goodworth Clatford and Upper Clatford differently?

6. Facilities

If TVBC's focus is truly 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 and not on facilities to differentiate rural settlements. I also struggle to understand any valid reasoning behind the determination of the core facilities. How can a place of worship be seen as a core facility and yet a doctor is not? This seems wholly arbitrary. Some are irrelevant to the majority of parishioners. Attendance at church is ever declining so it seems strange to consider this a core facility whereas the doctors' surgery is a universal need. Why the change from the eminently sensible facilities adopted by the Local Plan 2016 unless the only reason is to achieve a different development outcome as opposed to being evidence led?

Irrespective of the definition of facilities, should this even be relevant in light of TVBC's climate change aspirations? I would suggest not, the main factor for the promotion of sustainable development must surely be the level of transport provision in order to cut emissions.

7. Transport

To promote sustainable development, the focus must be on public transport. To develop in areas other than where the level of public transport is high will in no way assist this community to reduce its 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.

The limited bus service in Goodworth Clatford, at completely unhelpful times means it is not an option for residents as it only goes to Andover, cannot be used for commuting to work or to get to the train station or even for a reasonable shopping trip. Any reasonable person would not consider that this level of service provision is good or of a high quality as TVBC suggests. This assertion underlines the fact that LP40 is not an objective assessment. This would appear to be a document whose content is solely aimed at promoting TVBC's development choices (suggesting they have already been made or at the very least they have a preference) and so, in order to justify this approach poorly reasoned arguments have been put forward. This cannot be considered sound as it would not meet the government test that LP40 has been positively prepared and justified and so LP40 must be open to challenge as it progresses through the planning stages.

I also fail to understand how villages marked as 'L' with respect to transport provision, have the same transport provision as Goodworth Clatford shown as 'M' namely, Smannell, Vernham Dean, Barton Stacey. If, the only reason Goodworth Clatford is asserted to be 'M' is this because we have been linked to Upper Clatford and thereby Anna Valley? If so, this is inappropriate. Is TVBC really suggesting that elderly residents walk over a mile to Anna Valley along a 40mph road for part of their approximately one mile walk to Anna Valley to access this service?

Any development should be focused where there is a high standard of 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' which are neither core nor will serve to reduce car journeys.

Conclusion

I am not against development within the settlement boundary. Similarly, I support proportionate village development which will not destroy our great community spirit and cohesion nor overwhelm our facilities. The retention of our green spaces which are used by many other communities to promote 'cohesive and healthy communities' is essential. I very much hope that this damaging document to TVBC's rural communities is revised to reflect what TVBC's stated aims are, to reflect climate change imperatives and more generally make the communities served by TVBC positive and attractive places to live and thrive.

Your faithfully,

A solid black rectangular box used to redact the signature of Fiona Cross.

Fiona Cross