

## Upper Clatford Parish Council – Comments on Local Plan 2040 Stage 2 Consultation

1. Upper Clatford Parish Council has had an opportunity to consider the Local Plan 2040, and Councillors and Parishioners have welcomed the opportunity to discuss the Plan at the Andover Drop-in and other forums. We believe that in its current form it reflects the National Planning Policy Framework (NPPF) and also represents the Parish interests enshrined in our made Neighbourhood Development Plan (NDP).
2. We had two dominant observations at the Stage 1 Consultation which were a strong recommendation for Local Gaps to be recognised in the Local Plan 2040 and a rejection of the logic for combining Upper Clatford with Goodworth Clatford in order to place Upper Clatford as Tier 3 in the Settlement Hierarchy.
  - a. **Local Gaps (ENV4).** We are grateful that Local Gaps have been included at Policy ENV4. Our Local Gap is a hugely important feature to Parishioners and is covered in detail in our NDP at Policy UC11. 87% of respondents to the NDP Questionnaire Survey rated the Local Gap as important. The Local Gap has the A303 as its boundary to the North and ensures that coalescence with Andover is prevented and that Anna Valley and Upper Clatford retain their rural character. We continue to believe that Local Gaps should be afforded the necessary protections in the NPPF, and welcome such recognition in the Local Plan.
  - b. **Settlement Hierarchy (SS1).** We note the amended criteria for Tier 3 of the Settlement Hierarchy and acknowledge that Upper Clatford and Goodworth Clatford continue to be grouped together because each represents '*settlements which benefit from and have access to services and facilities with a nearby settlement*'. We continue to highlight that the villages are separated by several kilometres of rural landscape, and the grouping should not establish a rationale for future coalescence. We are supportive of the continued use of the Settlement Boundary for Tier 3 settlements and recognise this as a valuable planning tool to protect the character of Upper Clatford, whilst also supported by a range of other policies which will guide sustainable development in our Parish.
3. We have the following additional observations:
  - a. **Housing Requirement.** We note that the housing requirement for Upper Clatford will be made following the NDP Review due in May 2026, and that it will be derived using the methodology at paragraph 3.89. The Local Plan does not currently explain how housing requirements will be provided to Parishes which do not have an approved NDP or do not intend to have an NDP during the period of the Local Plan. We recommend that this is addressed to ensure that neighbourhood plans do not become the sole mechanism for allocating housing requirements in Tier 3 settlements, and that housing requirements are dispersed equitably across Tier 3 settlements in accordance with the methodology. We also note that having been grouped with Goodworth Clatford the housing requirements for the two Parishes will be set individually and recommend that the shared amenity of the primary school, which is the key reason for grouping, represents a capacity limitation which should be factored into future housing requirements.
  - b. **Inset Map 11.** Inset map 11 requires updating to show SINC TV609 Pillhill Brook which joins the Eastern SINC TV275 and the Western SINC TV299. A further SINC TV613 was approved on 11 November 2022 south of All Saints Church which should also be shown on the map. We also note that the designated Local

Green Spaces (LGS) as described and mapped in the NDP Policy UC12, are not shown on the inset map, and suggest that these should be included because they are an approved planning tool.

- c. **SHELAA.** We have a number of issues regarding the registration of Strategic Housing and Employment Land Availability Assessment (SHELAA):
  - i. We request that the listed constraints for SHELAAs include not only the Local Gap but also Local Green Space designation even though we understand that Upper Clatford has the only NDP with LGS designations. We suggest that the offers by landowners run counter to the purpose of Local Gap policy, and recommend that SHELAA should not be accepted within designated Local Gaps or Local Green Spaces.
  - ii. The registration of 3 SHELAA sites (123, 358 & 359) just across our boundary with the neighbouring Parish of Abbots Ann are within the Local Gap.
  - iii. SHELAA 124 and 125 are within the Local Gap in our Parish. They are also adjacent to SINC TV609, SINC TV275 and SINC TV299 on the Pillhill Brook, and are either totally within (125) or partially within (124) the Local Green Space designation in the Upper Clatford NDP.
  - iv. We were disappointed to see the registration of SHELAA 438 in close proximity to the Bury Hill Scheduled Monument, and adjacent to Test Valley's recently purchased Public Open Space. It also lies in the path of protected landscape view L6 in Policy UC10 of the Upper Clatford NDP. These constraints should be reflected in the SHELAA registration.
4. **Amenities.** We recommend that due consideration is given to the development of sufficient support infrastructure to ensure that the increased population associated with the proposed sustainable developments is able to access doctors, dentists, schools, etc. We are concerned that there are ongoing capacity issues with the sewage systems in Test Valley and that necessary mitigations and solutions must be provided to meet the needs of increased housing.