

Goodworth Clatford Parish Council

Clerk to the Council
Mrs E M Attwood



28/03/2024

Planning Policy Department
Test Valley Borough Council
Andover
Hants

Draft Local Plan 2040 Stage 2 (“LP40”)

Dear Sir/Madam

Goodworth Clatford Parish Council has reviewed LP40 and sets out below the areas of LP40 supported by Goodworth Clatford residents and also highlights some areas which we believe that TVBC should address in the next iteration of the Local Plan.

1. Spatial Strategy Approach Options

We support development at the most sustainable locations and, in particular, in tier 1. However, we would want to ensure that appropriate weight is given to the adequacy of the infrastructure in conjunction with development. It has become apparent in particular during the winter of 2023 that the drainage and sewage facilities are inadequate and not coping with the existing development and housing in place. We cannot therefore have more development without a robust sewage and drainage system. This includes Fullerton Waste Facility being capable of coping with the additional sewage with no impact through untreated excess flow into the Test or Anton rivers. In addition, we believe policy COM1 must be strengthened to ensure that there are adequate facilities such as doctor's surgeries and pharmacies to provide necessary services in areas of significant new development. These facilities must be delivered at the same time as the development and not at some point in the future.

2. Facilities

The core facilities have been pared down yet further from Stage 1. Whilst we question whether the limited nature of the four facilities deemed core by TVBC determines the sustainability of a village we believe that, instead of the vagaries that the stage 1 assessment produced, this will result in more equitable development. By including more villages in the tier 3 assessment a more proportionate allocation over the rural area is enabled and will, we believe, ensure that it does not result in overwhelming development in fewer villages. We acknowledge that there must be some development to ensure villages remain viable but strongly believe that that this should be determined by the community to reflect the need identified within that community and that it must be proportionate to the existing scale and infrastructure of the relevant village.

3. Grouping of Goodworth Clatford and Upper Clatford

An inaccuracy included in Stage 1 continues in LP40. LP40 states that the parishes of Upper Clatford and Goodworth Clatford share a village shop. Upper Clatford/Anna Valley has its own village shop - Greenfields Farm Shop, Foundry Road, Anna Valley, SP11 7LX - based on the definitions that TVBC has itself adopted in the Settlement Hierarchy Assessment paper at page 18 "Convenience Store includes....farm shops...". As a result, Table 6 on page 20 of the Settlement Hierarchy Assessment should be amended and 'yes' should be substituted with a 'no' as the table states that where both settlements have their own facility then this is scored 'no' as they are not shared. This leaves only one shared facility which is the primary school. It would seem to us to be an unjustifiable assertion that by having only one shared facility two settlements should be grouped together. To rely on one shared facility for a grouping would, we suggest, mean that multiple other villages would be required to be grouped together.

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 and characterised by rural countryside. We struggle to understand how the fact that each village has independently developed in a linear fashion, along a road, means that they should be grouped together.

In order to maintain the character of our individual local settlements, the retention of the green spaces between them is essential. In TVBC's own Character Appraisal of the Goodworth Clatford and Upper Clatford conservation areas 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." It goes on to state that "...careful consideration should be given to the likely impact of development on the edge or immediately outside of conservation area boundaries as this can have a detrimental impact on views into and out of the conservation areas. These features all combine to reinforce the rural character of the two villages and are worthy of preservation and enhancement. It is important that their significance is understood and taken into account when future development is considered. "

4. Settlement Boundaries

The TVBC policy of introducing Settlement Boundaries in the 2006 Local Plan has not resulted in a lack of development in rural villages. We therefore welcome the inclusion in LP40 of the retention of settlement boundaries in tiers 1-3. Goodworth Clatford Parish Council supports the retention of settlement boundaries in these tiers and that the principle of development is permitted within these boundaries.

5. Infrastructure

As we have stated in Item 4 above, we support development within the settlement boundaries. However, we feel that there should be far more emphasis on adequate infrastructure being in place prior to development or as a condition to development being permitted in tiers 1-3. Development in tier 1 must not be allowed to result in more sewage being discharged in the chalk streams in the rural villages. Nor should development in rural villages result in more surface water, groundwater or even sewage being experienced by the existing homes. Nor should planning applications be entertained where they would result in sewage being brought into a local waste treatment facility from outside the area when that waste treatment facility is already discharging sewage into Test Valley rivers because it has insufficient capacity.

We strongly believe that the Local Plan must be far more proscriptive in terms of infrastructure with respect to water use and management. We do not believe that policy CL4 is adequate. The statement that "Prior to occupation, adequate water supply, surface water drainage, wastewater infrastructure and wastewater treatment capacity is available or can be made available..." must be far stronger. This statement suggests that development can occur without firm requirements being in place and delivered, the wording 'can be made available' should be replaced by "and proven to have sufficient capacity for the development".

6. Local Gaps, Rural Gaps and Local Green Spaces

Goodworth Clatford Parish Council strongly supports policy ENV4 and the designation of the Anna Valley/Upper Clatford and Abbots Ann Local Gaps as having strategic importance in defining the edges of the Andover and Abbots Ann and Anna Valley/Upper Clatford settlements and in maintaining separation between them.

The Stephenson Halliday Study ("Test Valley Borough Council: Local Gaps Assessment Stephenson Halliday, 2023)" which provides a rationale for the designation of Local Gaps and a detailed examination of the nine Local Gaps in Test Valley makes recommendations with regard to these local gaps. Goodworth Clatford Parish Council would support the maintenance of the Abbots Ann separation as well as its reinforcement and would urge TVBC to consider this further in future iterations of LP40. Similarly, in respect of the Anna Valley/Upper Clatford Local Gap, we would support an extension of this gap to the south/south-east to limit the coalescence between Andover and Upper Clatford in the future.

Conclusion

In conclusion, as we stated in the response to the Stage 1 consultation, Goodworth Clatford and its parishioners are not against development as indicated by the content of our Goodworth Clatford Neighbourhood Plan. We are supportive of the changes that TVBC has made in LP40 namely, the retention of the settlement boundary concept, the lack of allocation of sites in tier 3 and the focus on siting development in the most sustainable locations.

As a parish, we continue to support proportionate village development which will not destroy the community spirit and cohesion that comes from being a small and tight knit community, nor overwhelm our limited facilities or our constrained drainage and sewage infrastructures. We believe that, in the main, TVBC has more successfully balanced the need for development with the maintaining the more rural nature of the tier 3 villages.

Your faithfully,



Eveline Attwood

Clerk to the Council

Goodworth Clatford Parish Council

cc. Councillors Maureen Flood and Susannah Hasselmann