

From: [REDACTED]
To: [Planning Policy](#)
Cc: [REDACTED]
Subject: Re: Local Plan - Settlement Hierarchy Assessment - February 2022
Date: 30 March 2024 06:28:44
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
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Dear Planning Policy,

I have not received a reply from you further to the below.

Please accept the issues I have raised below to be considered my further consultation response. I cannot provide a further reply as I intended to by the deadline of midday on 2nd April 2024, because the enquires I raised have not been answered. My original consultation response from April 2022 has not been adequately answered. The responses lacked any substance and in fact raised further questions than answers. To be clear, I most recently requested the evidence and rationale to support the various inaccuracies regarding the settlement boundary and the incorrect allocation of facilities. I have taken independent advice from a Chartered Town Planner who is unaware of any established rationale/test to support the assessments of the settlement boundary and the facilities of settlements applied by TVBC. I therefore respectfully request that TVBC corrects these inaccuracies and assessed settlement boundaries and facilities in accordance with the defined parish boundaries.

I have copied Cllr Jeffrey into this e-mail because I am aware he will be discussing the inaccurate settlement boundary maps (part of Longstock included in Stockbridge) on behalf of the Save Our Stockbridge (SOS) Committee, which is also a concern I have raised. I also understand that Stockbridge Parish Council has raised the same concerns. I am not confident that by simply submitting my response to TVBC it would result in my enquires being properly considered and answered. I do not wish to get to the next stage and find my enquiries have just been brushed under the carpet. I wish to gain adequate answers and for the inaccuracies to be corrected before the draft local plan is submitted to the Secretary of State.

In addition to the inaccurate settlement boundaries, the facilities for each settlement are incorrect. The assessment of the village of Longstock is clearly a matter for Longstock, but I refer to this village because some of their facilities have been **included** as being facilities of Stockbridge (and therefore affecting the assessment of the tier of Stockbridge) and some facilities of Longstock have been **excluded**.

In my initial consultation response of April 2022 (in the below correspondence) I raised the issue that Stockbridge cannot be considered to have a 'good level' of public transport (because it is almost non-existent), and as a result be in the tier set by TVBC. In response to this, TVBC has simply removed this vital service from its assessments of tiers. This is ludicrous considering the importance of this public service, but it is also sinister as its removal suggests the allocation of facilities and tiers is being manipulated to engineer a different outcome.

Presumably, public transport is a consideration for the rest of the Borough, and will be considered as such. It seems to be the case that because TVBC cannot explain this away, they have simply removed the assessment and pretended it's not important. Romsey and Andover both have excellent public transport facilities and even if TVBC removed the assessment of the public transport facilities from the assessment of every settlement; Romsey and Andover would be at a natural advantage because they have vital public transport services that most other settlements do not.

There does not appear to be any rationale for these inaccuracies and neither are they supported with evidence. The inaccuracies seem to be based on planning officer opinion only, which seemingly takes precedence over fact. Considering the importance of a local plan and its primary focus on shaping the future development of settlements, it is fundamentally wrong for the very foundations of the plan to be incorrect, or elements manipulated because they do not appear to accord to some other form of priority.

Whatever the motivation, assessments should be made on evidence only and I respectfully ask TVBC to do so. I do not consider the requirement of evidence to be contentious, but sensible and transparent, and essential, and as such I hope TVBC agrees the inaccuracies I have raised can all be corrected based on fact.

Please, I urge TVBC to correct the settlement boundaries in accordance with the parish boundaries to ensure the boundaries remain correct and that there is no future conflict between the local plan and supplementary planning documents (NDPs, VDS' etc.). I also urge for the facilities of both Stockbridge and Longstock to be correctly established and allocated to the correct settlement. I also request an explanation of the removal of public transport from Stockbridge. Public transport is a crucial service, arguably the most important service for rural communities, and it was clearly a consideration for TVBC in the existing Local Plan and the current consultation. It seems my concern could not be addressed, so TVBC simply removed this facility from its assessment which resulted in Stockbridge remaining in the tier TVBC seemingly wants to place them in.

I look forward to hearing from you shortly.

Yours sincerely,

Alex Lawrence

On 11 Mar 2024, at 16:28, Alex Lawrence [REDACTED] wrote:

Dear Planning Policy,

Thank you for your reply. I do not accept the response from the planning officer, it seems to be simply an opinion, but ignores the facts. Stockbridge and Longstock are two distinctly separate settlements. They are defined by their parish boundaries, so please can you confirm how the planning officer can make statements such as "Although in the Parish of Longstock, the school forms part of the built-up village of Stockbridge." Presumably there is a some form of established test that TVBC uses to 'rearrange' settlements outside of the established parish boundary? Please provide the evidence/rationale for this because I have not been able to locate anything that supports this. As such, I maintain this is an opinion rather than a matter of fact and I believe that TVBC has a duty to ensure local plans are accurate and based on facts and evidence, not planning officer opinion.

Further to the above, if settlements create their own Neighbour Development Plans, as Longstock has been in the process of doing for a few years, where does the land and facilities fit if a parish creates a plan for their parish, but the TVBC Local Plan conflicts with a NDP? Does Stockbridge actually decide what happens to land within Longstock that has been allocated by TVBC as being quasi-Stockbridge land for development and facility purposes, or does Longstock, because they have allocated the same land in their NDP? This is entirely inaccurate and I cannot fathom how TVBC expects the Local Plan to work effectively if they are knowingly creating a Local Plan that contradicts with another planning document i.e., NDPs.

The other comment from the planning officer relating to the Waitrose shop does not provide any answer. The comment is "The Waitrose shop is isolated and some 2km from the recreation ground in the village. The facilities in Stockbridge are some 1.6km when measured from The Grange, and are therefore closer, but the facilities in Stockbridge are not assessed as being a facility within the village." I do not understand the relevance of the distance of the shop from 'The Grange', but even if distance is a consideration, this argument is dismissed by the fact that with Longstock being a long and linear settlement, the distance is greater from one end of the village to the other than the distance quoted between The Grange and the shop. As with my point above, please can you provide the evidence/rationale for not including these facilities located within the parish of Longstock, within the draft Local Plan that assesses the facilities of Longstock because a statutory document as important as a Local Plan must be supported by evidence, and not opinion.

The assessment in these examples seems to be flawed and unsubstantiated with evidence or rationale. On one hand the planning officer claims Test Valley School forms part of the "built-up village of Stockbridge", despite being directly adjacent to housing as well as a kitchen showroom and vet practice located in Longstock, but on the other hand it seems the planning officer considers the Waitrose shop/cafe/nursery to be located too far away from Longstock, despite being within the parish boundary.

With this logic in mind, TVBC seemingly does not consider these facilities to be a part of Longstock, but they would presumably consider agricultural land, for example, adjacent to the Waitrose shop, to be outside the settlement boundary of Longstock, but within the parish of Longstock for the purposes of the Local Plan. There is no consistency in these assessments.

Your reply has sadly raised more questions than provided answers. I respectfully request the evidence and rationale for how TVBC groups facilities and areas of land into settlements for planning purposes, if it does not use the defined parish boundary to do so. The result is that facilities in settlements are flawed by some settlements having greater facilities than they actually have, and some having less than they have, and apparently based on the opinion of the planning officer.

I will appreciate your replies to the above because ultimately I wish to understand the process taken by TVBC, and I wish to correct the inaccuracies. I feel this is a fundamental issue to correct and as such, I will raise this with our MP if we cannot iron this out because we cannot have a statutory document that is flawed, and one which could affect the future of settlements.

Kind regards,
Alex

On Monday, 11 March 2024 at 12:03:07 GMT, Planning Policy
<planningpolicy@testvalley.gov.uk> wrote:

Dear Alex,

Thank you for your email and we apologise for the delay in our response.

A response to point 11 on your Regulation 18, Stage 1 representation can be found in the document titled 'Statement of Consultation Appendix 2: Schedule of Regulation 18 Stage 1 Comments' on the link below.

<https://www.testvalley.gov.uk/planning-and-building/planningpolicy/local-development-framework/draft-local-plan-2040?chapter=3>

Your representation number is 10389 and your comment linked to point 11 can be found on page 128. If you search your representation number, you will be able to read all officer responses provided on your comments made at Stage 1.

If you would like to provide a representation on this consultation, details on how to comment can be found here -

<https://www.testvalley.gov.uk/planning-and-building/planningpolicy/local-development-framework/draft-local-plan-2040?chapter=4>

Please note, the consultation ends at 12pm on 2 April.

I hope this provides you with the information you require but if you have any further queries, please do not hesitate to get back in touch.

Kind regards,

Planning Policy Team

Test Valley Borough Council

Beech Hurst

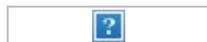
Weyhill Road

Andover

SP10 3AJ

planningpolicy@testvalley.gov.uk

01264 368000



From: Alex Lawrence [REDACTED]

Sent: Monday, February 26, 2024 2:44 PM

To: Planning Policy <planningpolicy@testvalley.gov.uk>

Subject: Re: Local Plan - Settlement Hierarchy Assessment - February 2022

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Dear Planning Policy,

I have recently reviewed the latest consultation documents and observed amongst other things, the facilities at Longstock have not changed the scoring of the settlement. Please see my point 11 below. Please can you advise why this is.

Yours faithfully,

Alex Lawrence

On 12 Apr 2022, at 09:12, Planning Policy
<planningpolicy@testvalley.gov.uk> wrote:

Dear Alex,

Thank you for your response on the Regulation 18 Stage One consultation for the Test Valley draft Local Plan.

Please accept this as confirmation of receipt.

Your reference number for this representation is 10389 which should be used where possible in any future correspondence on the Local Plan 2040.

Please note this response was received past the 12pm deadline on the 8th April. Your response will be taken into account but will be marked as late.

Kind regards

Planning Policy Team

01264 368000

Test Valley Borough Council

Beech Hurst

Weyhill Road

Andover

SP10 3AJ



From: Alex Lawrence [REDACTED]
Sent: 09 April 2022 06:55
To: Planning Policy <planningpolicy@testvalley.gov.uk>
Subject: Local Plan - Settlement Hierarchy Assessment - February 2022

Dear Planning Policy,

Please can you consider the below, in response to the consultation to the

Settlement Hierarchy Assessment (dated February 2022). I apologise that this did not reach you by midday yesterday, but the e-mail was stuck in my outbox. I hope you can still consider my response.

1. At 1.3 higher tier settlements are more sustainable because residents have greater access to facilities without having to travel as far by car. Stockbridge has approximately 560 residents and because it is isolated, all outlying villages rely on car transport, and in many cases travelling as far as a 10 mile radius of Stockbridge. This does **not** fit the category of sustainably in my view.

2. At 3.1 (Methodology) it is noted that the criteria for assessing sustainable locations is not a precise science. It is also noted at 3.1 that the NPPF places weight on development being located at places that are sustainable which offer public transport choices. Stockbridge is not considerable sustainable in my view due to the minimal, and lack of, public transport services.

3. Greater consideration should be given to how development can help mitigate the climate emergency crisis, by promoting larger development in areas where there is less reliance on car transport i.e. those with frequent and adequate public transport, and those within walking distances of services and employment.

4. Stockbridge not been grouped with nearby settlements just as those in 3.9 have. Why?

5. In 4.5 It is noted that Tier 2 Settlements have 'All key facilities' but this is incorrect in the case of Stockbridge. Bus services are minimal, they do not run to take people to work and bring them home, and there are no buses on a Sunday which means that Stockbridge does **not** meet the definition of a 'good level of public transport'.

6. At 4.9 it states that Stockbridge has a secondary school, but it does not because this is located in Longstock.

7. It is my conclusion following research, and discussions with TVBC Policy that proper consideration has not been given to allocating Stockbridge a Tier 2 settlement, weighted against the lack of sustainability due to the poor public transport provision, and the reliance on private vehicle to access Stockbridge.

8. Draft settlement hierarchy. I do not agree at 5.1 that Stockbridge meets the criteria of Tier 2 of having all the key facilities, because it does **not** have a 'good' level of public transport, as per the report's definition.

9. it has been confirmed by TVBC Policy treats both NHS and private dentist's are considered a 'key service'. I feel that this is very wrong because a medical facility that is private only will not be available to those on low incomes by virtue of being private. Services should **not** be considered if they are only available to those on higher incomes, and should only be considered 'key' when they are available to all, regardless of incomes. To put it another way, a settlement containing a private school, a private dentist and a private GP could not be considered as 'key' services for the purposes of settlement and planning policies written by the borough council because they would only be accessible by a portion of the settlement, and not by all.

10. I do not agree with TVBC's confirmation that a 'takeaway' should be considered both (a) a takeaway restaurant in the traditional sense that it does not sell food for consumption on the premises, or (b) a

pub/restaurant that might sell food to be consumed off the premises as well as on the premises. For accuracy, there should be a distinction between (a) being a 'takeaway' and (b) being 'has takeaway facilities'.

11. The facilities contributed to Longstock are incorrect. I haven't looked at the other settlements, but because the secondary school located in Longstock was incorrectly allocated to Stockbridge (please see item 6 above), I looked at this assessment for comparison.

Longstock has a substantial Waitrose shop and so it should score '1' and not '0' as a key facility. Longstock also has a cafe/restaurant and would also score '1' and not '0' for this. The Leckford Estate is located in Longstock and it has a Waitrose food shop and a cafe/restaurant at the same site, alongside a garden centre. The estate sells takeaway food and drinks though it's two on-site cafes, which would score Longstock a '1' and not '0'. Longstock is currently assessed as (Key facilities, Other facilities and Public transport) 4/3*/M. The result **should therefore be 5/5*/M** when including the above.

Yours faithfully,

Alex Lawrence

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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