

Planning Policy & Economic Development Service
Test Valley Borough Council
Beech Hurst
Weyhill Road
Andover
Hampshire SP10 3AJ

8th April 2022

Our Ref: 17063

Your Ref:

by email only

Dear Sir / Madam

REPRESENTATIONS TO THE TEST VALLEY DRAFT LOCAL PLAN 2040 REGULATION 18 – STAGE 1 CONSULTATION

The purpose of this letter is to provide representations on behalf of our client, Seaward Properties Ltd, to the Test Valley Draft Local Plan 2040 Regulation 18 – Stage 1 consultation document and associated evidence.

These representations propose a change to the methodology used in arriving at the Settlement Hierarchy and object to the categorisation as Lockerley as a Tier 4 settlement. In this regard The inclusion of Land at Coombs Meadow, Lockerley Road, Lockerley as a strategic housing allocation is proposed within the forthcoming Local Plan. The site location is shown in Figure 1.

Objection: Spatial Strategy Policy 1 (SSP1): Settlement Hierarchy

The Council's general approach towards focusing housing and other growth to sustainable locations is supported. The Council's decision to progress a hybrid of the three spatial options put forward in the previous Issues and Options Consultation is welcomed, with particular regard to focusing development where it would allow rural villages to grow and thrive, in accordance with Paragraph 79 of the NPPF, which states,

'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.'

Notwithstanding the above we object to the Council's categorisation of key services and facilities and the resultant effect this has on differentiating the rural settlements between Tier 3 and 4 of the proposed Settlement Hierarchy. The proposed key facilities used to assess the sustainability of settlements should be expanded to include 'parks and other public open space'. The importance to social well-being of providing convenient access to outdoor recreational space is stated in the NPPF, which states,

'b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering

well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being;

(Paragraph 8b)

'Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change.'

(Paragraph 98)

The importance of well-connected parks and other public open spaces during the COVID pandemic has highlighted the relevance of the above, particularly in relation to opportunities for physical exercise and in connecting people to the environment for mental health benefits. In a research study undertaken by the Heritage Fund in 2020¹ the following benefits of greenspace were identified:

- Enhancement to physical health and mental wellbeing.
- Opportunities for social integration.
- Opportunities for residents to get involved in their locality.
- Highlighting and mitigating social inequality.
- Connecting people with nature, which supports human and ecological wellbeing.
- Support to local economies.

Conversely public houses should not be included as a key facility for the assessment of rural settlement sustainability. There is clearly a role played by such facilities in terms of providing social interaction and limited rural employment. However, this role is not considered to sufficiently important to meeting the daily needs of local communities to justify the inclusion of public houses in same category as other 'key facilities' such as primary schools, convenience stores, public transport and outdoor sports facilities.

We object to the Council's assessment of Lockerley and its categorisation as a Tier 4 settlement in the proposed Settlement Hierarchy. Within Table 5 of the Settlement Hierarchy Assessment Topic Paper, Lockerley is considered to provide 5 key facilities (we propose this is increased to 6 with regard to the above), 4 other facilities and a good level of public transport and access to superfast broadband. Taking this into account Lockerley would be more appropriately categorised as a Tier 3 Settlement.

Vision and Rationale for the Development at Coombs Meadow, Lockerley Road, Lockerley

The Land at Coombs Meadow could deliver up to 25 dwellings and associated open space and SUDS within the first 5 years of the Plan period. The site provides a logical urban extension in a sustainable location.

Site and Surroundings

The site (1.3ha) adjoins the northern edge of Lockerley, adjacent to the existing residential area, community facilities (such as primary school, village hall and adjacent open space), frequent bus service and church. It is located approximately 2.5km from Mottisfont and Dunbridge Railway Station. The site currently comprises of a single agricultural field, to be considered of low agricultural value. The natural topography of the site is relatively flat.

The site is enclosed to the north by the railway line embankment (Romsey to Salisbury Railway Line) at some 5m in height, and to the south by a Lockerley C of E Primary School playing field and residential curtilages. The eastern boundary comprises a well-established hedgerow, with agricultural fields beyond.

¹ Space to Thrive, Heritage Fund 2020

The site is not within an area designated for high or medium flood risk, landscape sensitivity or historic significance and does not include heritage assets within its boundary. It is also not within, or adjacent to, a site of international, national or local ecological importance.

There are no known abnormal ground conditions or legal restrictions that would reduce the viability for the site.



Figure 1: Site Location

Sustainability Appraisal

A sustainability appraisal has been undertaken for the site utilising the objectives of the Test Valley Draft Local Plan Sustainability Appraisal and the associated scoring system shown below. It is noted these symbols are intended to provide a broad indication of performance and should be considered in conjunction with more detailed assessment where required. It is clear from the table below that the site represents a sustainable location for development within Lockerley, owing to its limited site constraints, well contained location within the landscape and its close proximity to key facilities with consideration to the objectives below.

Key to Appraisal

Strongly positive	++
Positive	+
Mixed performance	+/-
Negative	-
Strongly negative	--
Depends on implementation	i
Uncertain	?
No effect	o

Sustainability Objective	Performance	Commentary
1. Ensure everyone has the opportunity to live in an appropriate home that meets their needs.	++	The proposed development site could accommodate approximately 25 new residential dwellings of a range of sizes, types and tenures to cater for a variety of people's needs, including a provision of affordable housing.
2. Ensure the local economy is thriving with high and stable levels of growth, whilst supporting productivity and the promotion of a diverse economy, with the availability of a skilled workforce.	+	The proposed development site would contribute to the local economy both through the construction of the development, and post-construction. The proposed development would result in the creation of jobs and wages during the construction phase and will contribute to the overall longer term prosperity of the area through additional expenditure of future residents and additional skills brought to the local workforce in perpetuity. The development would make an important contribution to longer term sustainability of Lockerley as a settlement by providing additional residents to support local services.
3. Maintain and improve access to services, facilities and other infrastructure, whilst improving the efficiency and integration of transport networks and the availability and utilisation of sustainable modes of travel.	+	The proposed indicative development is considered to be a suitable size giving consideration to Lockerley's rural settlement status, which considers such settlements as having some key facilities and public transport services. Within the site priority will be given to pedestrians and cyclists over private cars to encourage a modal shift. Bus services do run to the village infrequently providing links to Romsey and Barton Peveril College, with bus stops close to the site. The proposed development could help further sustain these vital services for the village.
4. Encourage the efficient use of land and conserve soil resources.	+	The site is designated as Grade 4, as indicated within the Natural England South East Agricultural Land Classification Map, and as such the site is poor quality agricultural land and is well suited for residential development by removing pressure from higher grade sites elsewhere in the village such as Grade 2 and 3 (Good to Moderate) land to the north and south of the village.
5. Conserve and, where possible, enhance the water environment and ensure the sustainable management of water resources.	+	The site will incorporate a Sustainable Urban Drainage System that will improve water quality of run off from the site. Any forthcoming proposals will incorporate nitrate mitigation to ensure water quality impacts in the Solent are mitigated. Any forthcoming proposals for residential development will be built in line with best practice guidance to conserve water use.
6. Seek to avoid and reduce vulnerability to the risk of flooding and the resulting detrimental effects	+	The site will incorporate a Sustainable Urban Drainage System that will minimise run-off rates at the site to greenfield rates, as well as ensuring that the proposals do not increase flood risk elsewhere. The site is located within

to the public, economy and environment.		Flood Zone 1 and is therefore well suited for residential development in flood risk terms.
7. Maintain and, where possible, enhance air quality.	○	The proposed residential development is unlikely to lead to any impacts or changes to air quality.
8. Conserve and, where possible, enhance the Borough's landscape, townscape and settlement character.	+	The proposed development will inevitably lead to some landscape impacts; however, the site is well contained from external views which will minimise impacts with site boundaries that are defined by dense, mature hedgerows. Immediately to the north of the site, is the Wessex Main Railway Line on embankment, whilst residential development and a primary school sit to the South. Therefore, built development is a character in the surrounds and will provide a logical and well contained spatial expansion to the settlement.
9. Conserve and, where possible, enhance the historic environment and the significance of heritage assets.	○	The proposed residential development site is not located within the immediate proximity of heritage assets as to impact upon them.
10. Conserve and, where possible, enhance biodiversity and habitat connectivity.	++	The proposed development concept will incorporate green infrastructure to maintain and enhance biodiversity and habitats at the site.
11. Support the delivery of climate change mitigation and adaption measures.	i	The proposed residential development will incorporate best practice measures in line with relevant guidance to mitigate climate change impacts.
12. Seek to maintain and improve the health and wellbeing of the population.	++	The proposed development is within walking and cycling distance of key facilities including the school, village shop and recreation ground to encourage healthy lifestyles.

For the reasons set out above the proposed site allocation on the Land at Coombs Meadow is considered to represent a 'suitable' location for housing and logical area for growth in Lockerley.

Summary

The Council's approach to the Settlement Hierarchy requires further review, to account for both the importance of public open spaces to sustainable communities and to include Lockerley as a Tier 3 settlement.

The proposal for a Strategic Allocation on the Land at Coombs Meadow is considered to be consistent with the aims of the NPPF and National Planning Practice Guidance relating to the 'suitability' of land for housing. The points below summarise how the site responds to the guidance:

- There are no known physical limitations or problems of access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination on the site.
- A development comprising a mix of market and affordable dwellings in this location would provide a valuable contribution towards meeting local housing requirements and would maintain and enhance the sustainability of Lockerley.

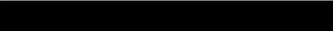
- The allocation would be well contained in the wider landscape due to existing mature vegetation and enclosure from existing residential development to the south and east and the railway embankment to the north.
- Impacts on the amenity of local residents would not be significant, subject to development coming forwards in accordance with the wider policies of the emerging Plan and the NPPF.
- It is clear from the assessment of the site utilizing the objectives within the Test Valley Draft Local Plan Sustainability Appraisal that it provides a well-placed sustainable location for an appropriate scale of growth.

We appreciate the opportunity to comment on the 'Issues and Options' and respectfully request the Council support this proposed allocation and alteration to the settlement boundary in order to help accommodate the Borough's housing need over the Plan period.

Yours sincerely



Ian Johnson MRTPI
Managing Director
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Email 

cc. Mrs L Brown, Seaward Properties Ltd