

2 April 2024

Delivered by email

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

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Dear Sir / Madam

Representations to Test Valley Local Plan 2040 Regulation 18 Stage 2 Consultation

These representations have been prepared by Turley on behalf of the Leckford Estate ("the Estate") in response to Test Valley Borough Council's Local Plan 2040 Regulation 18 Stage 2 Consultation ("the Reg 18 plan"). The Estate has submitted representations to earlier consultations on the emerging local plan and put forward sites for consideration in response to previous SHELAA calls-for-sites.

The Leckford Estate (which is the Waitrose farm estate supplying produce to Waitrose stores) has substantial property interests in agricultural land, farm holdings, residential and commercial buildings in and around the villages of Leckford and Longstock. The first part of the estate was purchased by Spedan Lewis in 1929 and was completed in 1944.

The Estate farms around 2,800 acres of land and owns approximately 98% of property in Leckford Village. It is a private water supplier to over 200 homes and has an extensive water, sewage, and road infrastructure.

The Leckford Estate's unique position as property and landowners enables the Estate to take a holistic view of the housing and employment needs of these settlements and it can provide land for the delivery of housing and rural employment needs and assist in meeting the objectives of the Test Valley Local Plan. In particular, Leckford has suffered from decline in recent years due to the lack of investment within the village. Through a carefully considered, long-term strategy the Estate wishes to invest in the village of Leckford to ensure its longevity for the longer term, whilst also contributing towards meeting local housing and employment needs within the Borough, including the provision of affordable housing.

The Leckford Estate has been reviewing opportunities for additional development within the village and have engaged with the community in assessing future needs for the Village. The Leckford Estate would deliver good quality, well designed housing, including some affordable housing, which, in turn, would support and sustain access to facilities and services required to facilitate healthy lifestyles. Future plans would appreciate Leckford's location on the River Test and development would provide links to the existing walking routes which would encourage active lifestyles. The Estate also contributes to the local

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visitor economy through existing attractions such as Leckford Abbas and the Longstock Park Water Garden.

The Estate welcomes the opportunity to comment the Reg 18 plan which would set the main planning context and will be a key factor future of the Village. To date we have been working within the framework of existing national planning policy and the adopted plan, in particular Policy COM9. A key focus of our representations is ensuring that the vitality of rural villages, such as Leckford, and seeking to ensure that any revised policies do not result in the stagnation or degradation of these villages.

Local Plan Vision and Objectives

The Reg 18 plan Vision and Objectives set out the Council's aspirations for development across the borough. These are broadly in line with the previous Regulation 18 Part 1 Plan and, as previously commented, these are closely aligned with the Leckford Estate's aspirations for future development in the village. The objective of 'Our Communities' sits closely with our client's aspirations for Leckford, in particular the aim that an increase in population can help to sustain the vibrancy of rural communities through helping to keep existing facilities and services.

The Draft Local Plan 2040 Consultation document sets out a vision, key challenges, and objectives for the Borough over the plan period. The Leckford Estate supports the overarching vision of the Draft Local Plan and it is considered that the Leckford Estate can assist in achieving aspects of the vision. Support is also given to the 'health, wellbeing, culture, leisure and recreation' objective. Initial feasibility studies for additional development in Leckford indicate that development could provide enhanced play equipment for children and provide more recreational spaces to provide existing and future residents with better access to recreational opportunities within and around the village. This also accords with NPPF Paragraph 96 which aims 'to achieve healthy, inclusive and safe places.'

The 'built, historic and natural environment' objective is also supported. Leckford is located alongside the River Test which is a SSSI and within a Conservation Area and the village contains many listed buildings, all of which contribute to its unique identity. It is acknowledged that these are important characteristics of the village and the Estate is committed to development which would complement these assets and secure their future use. (in particular Abbots Manor Farm which is currently vacant and in poor condition). In addition, the 'ecology and biodiversity' objective is supported as the Leckford Estate seeks to enhance biodiversity opportunities through its agricultural activities. These aspirations align with NPPF Paragraph 180 which specifies that contributions to enhance the natural and local environment should be made.

The objectives related to housing and design are supported and the Estate would seek to promote development which would provide a range of safe, attractive, integrated, and well-designed homes and environments. The Leckford Estate is a very significant land and property owner within the village of Leckford which allows a holistic view of housing delivery to be taken. In addition to providing new housing, the Estate would seek to refurbish some of the existing housing stock and as well as addressing the current perceived traffic and road safety issues on the A3057.

Spatial Strategy Policy 1 (SS1): Settlement Hierarchy

The Reg 18 plan proposes a 4-tier system, compared to the 5-tier hierarchy in the Part 1 consultation. While our previous representations favoured a 4-tier hierarchy, the proposed hierarchy combines Tier 4 settlements with the open countryside. We do not support this approach as it does not differentiate the status of an existing built-up area, with a settlement boundary, and open countryside and would accordingly restrict the potential growth of Tier 4 settlements. It is our view that there is a significant

difference between existing settlements with a moderate level of built-form and existing services and Open Countryside; the settlement hierarchy needs to reflect this.

We do not think it would be beneficial to subdivide the rural villages into two separate tiers within the Local Plan. This could potentially lead to more pressure to accommodate housing development in settlements which are considered 'more sustainable' (on the basis of the current distribution of services and facilities) and have been placed in the higher tier, while villages which fall into the lower tier will be deemed 'less sustainable' and less suitable for further development. This disregards the fact that carefully conceived new development at an appropriate scale could enhance the sustainability of the settlement. Rather, we would prefer the settlements identified as part of Tier 4 to be included in Tier 3, with Tier 4 being reserved for Open Countryside.

As mentioned in our previous representations, we do not dispute the assessed sustainability of Leckford based on its current level of key facilities and public transport provision. However, we are concerned that the approach taken would restrict future growth and negatively impact the sustainability of the village, as well as other settlements within this tier. This approach does not appear to match the aspirations set out in the Local Plan Objectives, in particular the 'Our Communities' objective which seeks to ensure the vibrancy of rural villages. The Settlement Hierarchy Topic Paper provides an updated settlement assessment in Table 7 which shows that Leckford has 2 Key Facilities and 2 other facilities, which is a contributing factor in it being moved into Tier 4. However, we note that some Key Facilities, such as the village shop, closed in recent years and may have contributed to the Council's assessment in 'downgrading' the assessment of Leckford. We consider that the Council's proposed approach would only serve to embed any recent issues around the vibrancy of existing villages and restrict their ability to recover and / or offer a better range of facilities for their residents in the future; the overall approach runs contrary to the Council's Vision and Objectives.

In considering the sustainability of settlements, the local planning authority take an approach which seeks to project what future development might help make settlements more sustainable in the longer term. While it is recognised that there is value added in understanding current levels of services and facilities provided in settlements, this should not be the only determinant of settlement hierarchy. Consideration should also be given to the future sustainability of each settlement to ensure that opportunities are identified for settlements to grow appropriately and enhance their sustainability over the plan period. We consider that a more sophisticated and flexible approach to the definition of sustainability is required alongside a more sophisticated and flexible approach to how the hierarchy is used in any future emerging policy.

The Leckford Estate's plan for the village of Leckford would provide housing (including affordable housing), community facilities such as a multi-purpose community hub whilst, importantly, conserving and enhancing valued heritage assets. This would enhance the sustainability of Leckford by enabling more of the community's day-to-day needs to be catered for within the village through provision of retail and community space, recreational opportunities and co-working space. In addition, the provision of additional housing would crucially support the vitality of the village, providing economic and social benefits, as housing could be provided for younger people, families, older people, downsizers, single person households and those in need of affordable housing.

As such, we consider it imperative for future planning policies which set parameters about the scale of development according to tiers within a settlement hierarchy to be applied with flexibility which allows for the specific circumstances and opportunities available in each individual settlement to be taken into account. This would allow services, facilities, and housing to be delivered in a sustainable manner and would ensure that settlements are not prejudiced by the tiered settlement hierarchy.

Overall, we would like to ensure that the policy wording allows for housing and services and facilities to be delivered in settlements within Tier 4 where they can contribute to meeting the NPPF's aim of sustainable development and the vision and objectives for Test Valley. We would urge the council to prepare a draft policy in time for the Stage 2 Regulation 18 consultation later this year, that is flexible and does not unnecessarily constrain the scale of development in Tier 4 settlements due to the current lack of services and facilities.

While we do not object to the inclusion of any specific type of development proposed in this policy, we consider that this high level of restriction would impact the vitality of existing villages and restrict the potential for their growth to support local needs.

Despite the concerns raised above, we strongly support the inclusion of community-led development in Tier 4 settlements. While further detail is provided in our response to Policy HOU2, supporting community-led development is key to addressing future needs in Leckford.

Spatial Strategy: Settlement Boundaries

While not specifically a component of Spatial Strategy Policy 1, the Spatial Strategy also comments on the proposed settlement boundaries. Paragraph 3.43 of the supporting text states that Tier 4 settlements with existing settlement boundaries would have these boundaries removed as part of the proposals. We strongly object to this approach as this would jeopardise the vitality of these rural settlements (including Leckford and Longstock) and runs contrary to the Local Plan's Vision and Objectives to ensure the vibrancy of rural villages.

Paragraph 3.43 also considers whether these settlements should include a settlement boundary, whether they should be included in Tier 3 and have included potential boundaries if the proposed approach changes; these are based on the settlement boundaries contained in the Adopted Local Plan 2016. As highlighted above, we object to the splitting of rural settlements into two separate Tiers as this could result in a disjointed approach and see some existing settlements lag behind others in terms of appropriate levels of growth.

While the approach to considering existing settlement boundaries is a useful starting point, we would object to an approach that defaults to the existing settlement boundaries as this would again, in many cases, prevent and stifle the well-conceived and sustainable growth of rural villages, including the provision of housing and services to meet existing and future needs. There is a clear benefit in providing for rural villages to include modest growth, relative to the scale of the village, which would meet the Vision and Objectives of the Reg 18 plan. While we do not have any specific comments at this stage on what the extent of a revised settlement boundary for Leckford should be, we would welcome the opportunity to work proactively and positively with Test Valley Borough Council as part of any emerging proposals, and, as noted above, have made various proposals through SHLAA site submissions.

Policy HOU2: Community Led Development

In our previous representations we commented that the Local Plan should carry over Policy COM9 from the adopted plan and be updated to enable community-led development to come forward where it supports sustainable development. We strongly support the Council's approach in carrying over this policy and updating it to state that community-led development is supported where *'there is a need for the development to maintain or enhance the economic, social and environmental sustainability of the settlement, through supporting the viability of existing facilities and services.'*

The policy also requires that proposals will demonstrate how any community benefits would support existing facilities / services beyond what would otherwise be delivered through S106 obligations and / or CIL contributions. We note that in rural communities, such as Leckford, there may not be any planned

improvements through S106 contributions or CIL and therefore we query whether this element of the policy is necessary for rural communities.

The revised policy also requires that residential development coming forward under this policy is predominantly for affordable housing. We note that there may be proposals in rural communities where there is a more general need for market housing, rather than specifically affordable housing. The effects of this revised policy would be more restrictive than the adopted COM9 with paragraph 5.114 of the adopted plan highlighting that both market and affordable housing are appropriate under adopted policy. While affordable housing will likely be an element of any proposals, we are concerned that this policy is too restrictive and should be amended to state “that this is for predominantly affordable housing or meets an identified need for market housing...”

Policy HOU4: First Homes Exception Affordable Housing

We support Policy HOU4’s approach to enable exception sites for first homes and consider that this may assist other policies (such as Policy HOU2 and HOU3) to vitalise rural communities in addressing specific needs. Proposals for First Homes in such locations could assist with adding vitality to existing villages through encouraging younger people to live in such areas.

Summary

The Leckford Estate has a long-term interest in the village of Leckford and is therefore keen to ensure that an appropriate local planning policy framework is developed which will ensure a successful, sustainable and viable future for the village. There is a unique opportunity to create new development within the village centre and to deliver new homes along with significant community benefits which would enhance the sustainability of Leckford.

We are grateful to Test Valley Borough Council for the opportunity to influence the new Local Plan. We believe that the distribution of development should seek to achieve the principles of sustainable development in accordance with the National Planning Policy Framework. As such we would encourage the adoption of a flexible policy approach to the settlement hierarchy. This would vitally ensure that the necessary housing, services and facilities can be provided to settlements in Tiers 3 and 4 over the plan period in a sustainable manner rather than prejudicing the sustainability and long term viability of settlements by adopting the tiered hierarchy currently proposed in the consultation draft plan. Such an approach will also assist the Council in delivering at least the minimum rural housing requirement it has identified in Policy SS4.

The Leckford Estate looks forward to working with the Council to inform the next stage of the Local Plan. If we can be of assistance, please do not hesitate to get in touch.

Yours sincerely



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Senior Planner

