

Test Valley Borough Council Next Local Plan - Refined Issues and Options Consultation

COMMENTS FORM

Test Valley Borough Council has published for public participation its Refined Issues and Options document. This is the second stage of preparing the next Local Plan, which follows the Issues and Options consultation in 2018.

You can respond to our consultation by filling out the form below. Further information can be found on our website at: www.testvalley.gov.uk/nextlocalplan

The consultation period runs from Friday 3 July 2020 to 4.30pm on 28 August 2020. Please respond before the close of the consultation period.

Once the form has been completed, please send to

If you are unable to send via email, please send a postal copy to our address below.

Contacting us

We are happy to help. If you have any queries, please contact us at:
Planning Policy and Economic Development Service
Test Valley Borough Council
Beech Hurst
Weyhill Road
Andover
SP10 3AJ

Tel: 01264 368000

Website: www.testvalley.gov.uk/nextlocalplan

Part A: Your Details

Please fill in all boxes marked with an *

Title*		First Name*	
Surname*			
Organisation* (If responding on behalf of an organisation)			

If you wish your comments to be acknowledged and to be kept informed of progress, please provide your email address below:

Email Address*	
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If you don't have an email address and wish your comments to be acknowledged and to be kept informed of progress, please provide your postal address.

Address*			
		Postcode	

If you are an agent please give the name/company/organisation you are representing:

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Personal Details and General Data Protection Regulation

Please note that representations cannot be treated as confidential. If you are responding as an individual, rather than as an organisation, we will not publish your contact details (email/postal address and telephone number) or signatures online, however the original representations will be available for public viewing at our offices by prior appointment. All representations and related documents will be held by the Council for a period of 6months after the next Local Plan is adopted.

The Council respects your privacy and is committed to protecting your personal data. Further details on the General Data Protection Regulation and Privacy Notices are available on our website

<http://www.testvalley.gov.uk/aboutyourcouncil/accesstoinformation/gdpr>

Part B: Your Comments

Please use the boxes below to state your comments and questions. Please make it clear which paragraph or question your comments relate to where possible.

Paragraph / Question Ref	Comments
	Please see enclosed letter which provides comments and responses on behalf of the Leckford Estate to Questions 1-12, 15, 17 and 18.

Please use next page if necessary

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What happens next?

All valid responses will be acknowledged and you will be given a reference number. Please quote this number when contacting the Council about the next Local Plan. If you have an agent acting on your behalf, correspondence will be sent to your agent.

All response received will be taken into account as part of the preparation of the next Local Plan.

28 August 2020

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

Ref: WAIW3004

Dear Sir / Madam

REPRESENTATIONS TO TEST VALLEY'S NEXT LOCAL PLAN - REFINED ISSUES AND OPTIONS CONSULTATION ON BEHALF OF THE LECKFORD ESTATE

Thank you for consulting us on the Next Local Plan for Test Valley - Refined Issues and Options. We are pleased to provide this response on behalf of the Leckford Estate ("the Estate").

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 Longstock and Leckford. The first part of estate was purchased by Spedan Lewis in 1929 and was completed in 1944

The Estate farms around 2800 acres of land and owns approximately 98% of property in Leckford Village and around 20% of property in Longstock Village. It is a private water supplier to over 200 homes and has an extensive water, sewage and road infrastructure.

The Estate has ambitions to produce and deliver a masterplan for Leckford Village Centre with the involvement and support of the Leckford community. It is also engaged in the preparation of a neighbourhood plan for Longstock. The Estate welcomes the opportunity to provide its views on the refined issues and options consultation.

HOUSING MARKET AREAS

Question 1

Should (a) we maintain the two existing HMAs, but perhaps with a revised boundary between them, such as enlarging the area within STV HMA. If so, what additional area(s) of the Borough should be included within STV HMA? Alternatively, (b) should a single HMA for the whole of Test Valley be used? Or (c) should additional HMAs be created, increasing the number to 3 or 4, with the additional HMA(s) applying to the rural area?

Since the adoption of the Test Valley Local Plan 2011-2029, the approach to calculating housing need has changed at a national level and the National Planning Policy Framework (NPPF) requires that *“strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance,”* (NPPF 2019, paragraph 60). As the 2019 NPPF no longer relies on HMA for the assessment of housing needs, it is no longer appropriate, or necessary, to plan to meet the Borough’s housing need based on distributing housing development across two Housing Market Areas. The Council can meet its own minimum housing needs anywhere in the Borough provided that the approach it adopts to the location of housing is considered to be sustainable.

Where HMAs previously played a fundamental role in establishing the objectively assessed housing need, they are now of less significance as the standard method outlined in the planning practice guidance (PPG) sets the baseline using national household growth projections at the local authority level which are adjusted according to market signals. This approach is arguably simpler and is intended by the government to speed up plan-making. The adoption of an approach which continues to rely on HMAs, could arbitrarily complicate the process of housing distribution and could unnecessarily constrain its distribution.

A wide variety of sites in terms of location and size should be allocated. The allocation of housing development across the Borough should be based on an assessment of the suitable and available sites and their respective sustainability, taking into account their constraints and opportunities. To distribute housing solely according to Housing Market Areas would not achieve the objectives of sustainable development and may not fully take into account the ability of rural areas to accommodate sustainable development.

The government has recently published a consultation on a revised standard methodology for calculating local housing need which takes into account the existing housing stock of the area, household projections and market signals relating to affordability and how it has changed over the last 10 years. The revised standard methodology results in a significant increase in the level of housing need across Test Valley to 813 dwellings per year. Paragraph 18 of that consultation states: *“The standard method results in a local authority-wide number that needs to be planned for. The local area then decides how and where in their authority that need is best met in accordance with national policy.”* National policy is focused on achieving the principles of sustainable development and no longer emphasises housing market areas as a way of allocating development.

The current “White Paper: Planning for the Future” (MHCLG, August 2020) indicates how the standard method would be a means of distributing the national housebuilding target, having regard to a number of factors including the size of existing settlements, the relative affordability of places, the extent of land constraints, opportunities for better use of brownfield/previously developed land and the need to plan for land uses other than housing (paragraph 2.25). While this relates to the national distribution of housing, it provides a clear indication of how the government considers the supply of housing should be planned for at a local level.

The Council must recognise the NPPF requirement to ensure that at least 10% of its housing should be delivered on identified sites of less than 1ha (paragraph 68). These sites must be identified in the plan rather than relying on unallocated ‘windfall sites’ which, by definition are not identified sites.

Taking all this into account, it would not be appropriate to maintain the approach of planning for two separate housing market areas (HMA), nor would it be worthwhile to introduce additional new housing market areas. A single HMA for the whole of Test Valley should be considered and the allocation of development should be based on principles of sustainable development.

Question 2

In determining HMAs how should wider relationships with settlements beyond the Borough's boundaries, be taken into account, including with Southampton, Salisbury and Winchester?

Test Valley has strong inter-relationships with nearby larger settlements, in terms of commuting and provision of higher order services, and these should be recognised in the next Local Plan. The Borough's boundaries are historic and do not fully reflect how people live and work in the present day.

Some neighbouring authorities are affected by significant constraints (e.g. the presence of a National Park within their administrative boundary) which may limit their ability to fully meet their housing needs as identified by the standard methodology. The main function of HMAs, as set out in the 2019 NPPF, is to deal with cross-boundary co-operation on strategic planning matters including housing need. Where there are unmet needs arising from neighbouring authorities, Test Valley should seek to assist in meeting these unmet needs in locations as close as possible to where the need arises. By way of example, if unmet housing need was to arise from Southampton, TVBC should seek to assist in accommodating this need in the southern part of the Borough having regard to relevant evidence on commuting and migration patterns.

Question 3

Should an alternative approach to using parish boundaries be used for HMAs? If so, would this be easily be identifiable and practical for monitoring purposes?

We would reiterate the points that have made in response to Question 1, that the most appropriate course of action is to assume Test Valley Borough represents a single HMA and to plan to meet the objectively assessed need based on the revised Standard Method. The distribution of housing should be based on achieving sustainable patterns of development across a range of site sizes, as this would best meet local housing needs.

If however there was to be a subdivision of the Borough into various HMAs, then parish boundaries provide the most appropriate basis for defining HMA boundaries. The reasons for this are twofold. Firstly, they are historic and not subject to change, unlike for example ward boundaries. Secondly, Neighbourhood Planning is typically undertaken at the parish level (although not always).

When a Neighbourhood Plan is made, it becomes part of the Development Plan for the area, so in order to provide clarity for those parishes wishing to progress a Neighbourhood Plan, we recommend that no parish is subdivided into separate HMAs.

SETTLEMENT HIERARCHIES

Question 4

Should the number steps of the settlement hierarchy be increased, for example by sub-dividing the 'rural villages' into two separate tiers?

A settlement hierarchy can be useful in considering which settlements constitute sustainable locations for development based on existing services and facilities. The use of such hierarchies however often fails to consider whether, in smaller settlements, development could lead to an increase or improvement in service provision and in the longer-term sustainability of the settlement. Therefore planning policies which set parameters about the scale of development according to tiers within a settlement hierarchy

should be applied with flexibility which allows the specific circumstances of each individual settlement to be taken into account.

In light of the above, we do not consider 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.

The CLA published a briefing "Sustainable Villages – making rural communities fit for the future" (Nov 2018) which identified that villages with fewer services are often not allocated housing and have very limited development options to improve their sustainability, leaving them in a cycle of decline.

As settlement hierarchies are typically based on the current provision of facilities, they do not take into account change over time. For example, services and facilities can close down or change their use to something else, and new services can open. This potentially makes settlements more or less sustainable over a plan period. Local Plan settlement hierarchy policies tend to focus on the sustainability of the settlement at the time the hierarchy was devised however and are not flexible to respond to change. This is a particular concern as hierarchies can be in place over more than one Local Plan period.

Also, the kind of services that communities require is changing over time, mainly due to technology. The CLA briefing states that *"Sustainability assessments measure villages against a range of services and amenities more akin to how previous generations lived and used services."* For example, post offices and libraries have featured in many settlement hierarchy assessments in the past, but with many of the smaller post offices and libraries across Hampshire having closed down over recent years, it would not be fair to say that this makes a settlement significantly less sustainable, given that they still have significant populations and new digital services are being provided in their place. In fact part of the reason for their closure in some places, is that they were no longer well-used as people found alternatives.

The Coronavirus lockdown has seen many people working from home and relying heavily on online shopping deliveries, telephone and online GP consultations, community pharmacy deliveries and many other services that are not physically located within the local community or within a building that can be labelled as a community facility.

It will be important for the next local plan to ensure that smaller rural settlements where there are suitable and deliverable sites and community support for further development which has the potential to regenerate a village community are not prejudiced or over-looked because of an approach which focusses too heavily on a defined settlement hierarchy. This is especially important if new development can contribute to the sustainability of the settlement by supporting existing services and facilities, providing new services or providing infrastructure improvements.

The Leckford Estate wishes to bring forward a masterplan for the village of Leckford which would provide not only housing, but also a range of community facilities such as a multi-purpose community hub which could accommodate a shop, a café, community meeting space, café and some small-scale business space. These facilities, along with new housing development, have been identified as being necessary for the long-term sustainability of the settlement of Leckford by the community through initial community involvement in the masterplanning process. The provision of such facilities would enhance the sustainability of Leckford as more of the community's day-to-day needs could be catered for within the

village. This would reduce the need to travel as well as providing social and economic benefits to the village and its residents.

Question 5

How should we decide which settlements to include within each step of the settlement hierarchy?

The concept of a settlement hierarchy, as set out in the current Local Plan, is linked to the perceived sustainability of settlements based on *"the settlements current characteristics, population and access to a range of services and facilities"* (Adopted Local Plan paragraph 5.43). The purpose of the hierarchy (again as per the adopted local plan) is to "provide a basis for the distribution of development across the Borough in sustainable locations."

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 any hierarchy is used. In considering the sustainability of settlements, the local planning authority should not rely solely on a 'snapshot' assessment of services and facilities in each given settlement at a point in time but should consider whether, and how, future development might help make settlements more sustainable in the longer term.

It is recognised that there is a value in understanding current levels of service and facilities provision in settlements but this should not be the only determinant of settlement sustainability. Consideration should also be given to the future potential sustainability of the settlement and ensure that opportunities are identified for settlements to grow appropriately and enhance their sustainability over the plan period.

The spread of fibre broadband has increased the ability for people to work from home and this has been seen to be very effective during the recent Coronavirus lockdown. Improvements to broadband access across rural areas could play an important role in making some rural settlements more sustainable locations as their residents' need to travel for work and other purposes reduces. Leckford village has been provided with fibre broadband as part of the Hampshire Village project. This coupled with the allocation of development which could either provide new or support existing services and facilities will go a long way to making these settlements more sustainable.

Question 6

Should we consider groups of rural settlements together, where these are closely related to each other and/or share facilities and services?

Many rural settlements share services and facilities and in some cases it might not be sustainable or viable to maintain services if they were only used by residents of the settlement in which they are located. A simple example of this is primary schools which have catchment areas covering several villages.

Residents of Leckford for example have relatively limited services and facilities in the village at the present time and therefore also make use of facilities in, Longstock, and Chilbolton at a village level, and also rely on Stockbridge for some higher order services. It is important to consider the relationship between these groups of rural communities and also the relationship with larger settlements nearby, rather than to focus solely on services within each individual settlement.

Question 7

How should we treat rural settlements which are close to other larger settlements and can therefore also easily access their facilities and services?

Smaller settlements that are close to other larger settlements may seem to represent sustainable locations for future development and growth if there is easy access to the services and facilities of the larger settlement. It should also be recognised however that some smaller communities which are not adjacent to larger settlements will wish to be able to support their own services and facilities and will be happy to accommodate some growth in order to do so. We would encourage the Council to look at the specific local issues of each settlement and not to prescribe a blanket approach.

SETTLEMENT BOUNDARIES

The concept of defining settlement boundaries is well-established and has been a key element of plan-making for many years. At the national level, Planning Practice Guidance supports the use of settlement boundaries as a policy tool. The guidance also affirms that a wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlement will need to be supported by robust evidence of their appropriateness [PPG Paragraph: 009 Reference ID: 67-009-20190722].

As noted at paragraph 5.25 of the consultation document, in Test Valley the definition of settlement boundaries has, in essence, been used as a tool to differentiate between areas where development is acceptable in principle (i.e. within a defined settlement boundary) and areas where development is restricted (unless specifically provided for by another policy of the plan). This can be seen in the text of adopted Policy COM2 – Settlement hierarchy which states: *“Within the boundaries of the settlements identified in the hierarchy (Table 7) and identified on Inset Maps the principle of development and redevelopment will be permitted.....Development outside the boundaries of settlements in the hierarchy will only be permitted if.....”*

The definition of settlement boundaries has therefore been a key determinant of where, in principle, new development can be located for the duration of the local plan.

The adopted local plan approach to the definition of settlement boundaries has been for boundaries to be drawn tightly around existing built development. We consider that this approach is flawed, for reasons which we expand on below, and that an alternative approach should be taken in the next local plan.

The relationship between the overall objectives of the plan and the definition of settlement boundaries needs to be considered and understood. The current local plan for example identified 15 objectives which helped shape the policy direction of the plan. For “Local Communities” these objectives included:

- 1) Providing for the future housing needs, types and tenures within the Borough.*
- 2) Promote appropriate scale of development in settlements in keeping with their size, character and function.*
- 3) Create sustainable communities, locating development where daily needs for employment, shopping, leisure, recreation, education, health and other community facilities are accessible by sustainable modes of transport.*

In practice however, the approach of defining boundaries tightly around existing built development has limited (or precluded) opportunities to bring forward development to fulfil these objectives, particularly in the case of smaller rural settlements. Such development would, in many cases, contribute to meeting local housing and employment needs and creating more sustainable rural communities.

The rationale for defining settlement boundaries should be clearly stated. The purpose should not be simply to reflect the extent of existing built development (at a fixed point in time) which could be seen to be the case with the approach adopted in the current local plan). Rather, in defining settlement boundaries for the duration of the local plan, regard should be had to the need for the managed and sustainable growth of settlements, including smaller rural settlements, to ensure that communities' needs for housing, jobs and facilities can be met at a local level. The careful definition of boundaries to allow for a level of regeneration and growth proportionate to the size and nature of the settlement, without compromising the integrity of the Council's spatial strategy and settlement hierarchy, is advocated. Such an approach will better support the vibrancy and vitality of rural communities in Test Valley.

One approach could look at the historical size of settlements and include sites previously developed which have since fallen into disuse and therefore currently sit outside settlement boundaries when they previously were part of the settlement.

Question 8

In updating the settlement boundaries to reflect recent development which has built [sic] and development with planning permission, should we also include new allocations?

As noted above, the purpose of defining settlement boundaries is not to define the current limits of built development; rather, the definition of settlement boundaries is a policy tool which determines the 'in principle' acceptability of development in a given location for the duration of the local plan. Government advice is that plans should be reviewed every five years and these future reviews will provide an opportunity to amend boundaries, beyond the next local plan, in light of any changes circumstances.

In this context it is entirely appropriate that land which is allocated for development in the next local plan should be included within a revised settlement boundary. Land is only likely to be allocated if development thereon is demonstrated to be deliverable within the plan period and the allocated land will, consequently, for part of the settlement when developed.

It is recognised that some localised issues may arise related to the definition of a precise settlement boundary in respect of allocations which anticipate the delivery of mixed-used development including, for example, areas of public open space, playing fields, or landscape or ecological buffers etc. Such features may be required by, or form part of the context for, residential, employment or community development but will have an open character and would not be suitable to accommodate further built development. In such circumstances it is still considered that the settlement boundary should be amended to include the allocation site boundary and that suitable protection of areas from built development can be secured through the allocations themselves.

Question 9

How should we define settlement boundaries? What types of land uses should be included, such as public open space?

When reviewing settlement boundaries, the LPA should:

- Adopt an approach which has regard to settlement morphology and to the historic pattern of development within settlements. Plots within settlements which have previously been developed but where buildings have been lost or removed over time, should not automatically be excluded from the settlement boundary where they are clearly related to the historic form of the settlement can could contribute to meeting future housing, employment of community facility need.
- Engage closely with Parish Councils, Parish Meetings and Neighbourhood Plan Groups to obtain their thoughts and inputs and draw on their local knowledge. Where there is local community support for defining a settlement boundary which allows for managed growth of the settlement to improve its long-term sustainability this should be reflected in the defined settlement boundary.
- Adopt an approach which defines boundaries more loosely than has previously been the case but still based on physical features which are readily identifiable and understandable. Where practical, settlement boundaries should follow clearly defined physical features, such as roads, footpaths / cycleways, water courses, walls, fences and hedgerows, in order to define the built area of the settlement.
- Take account of all land uses within the settlement including, housing, employment, commercial and community uses and public open space which is clearly related to the settlement (e.g. village greens, play grounds, informal recreational areas (but excluding recreational space (e.g. playing fields) at the edge of settlements which primarily relates to the countryside.

The methodology for assessing and defining settlement boundaries should be consistent and transparent and should be clearly set out in the local plan evidence base.

Question 10

Should the approach to using whole curtilages for defining settlement boundaries be retained, or should we take account of physical boundaries which extend beyond curtilages, or limit settlement boundaries to only parts of curtilages?

The term curtilage is generally used to describe the land immediately surrounding a house or dwelling (or indeed a commercial property) and can include any closely associated buildings or structures forming one enclosure with it. It is a legal concept, related to rights of ownership and use, which has become enshrined in planning law however, there is no legal planning definition of what constitutes a curtilage and the definition as to what constitutes curtilage is a matter of planning judgement.

As curtilage is not necessarily related to physical features 'on the ground' we consider that it is not appropriate to rely on the concept of curtilage when defining settlement boundaries. As noted above, it is important that the basis on which boundaries are defined is consistent, transparent and readily understood. Reliance on physical features such as roads, water courses, walls, fences and hedgerows provides a more sensible basis for defining settlement boundaries.

In our judgement it is not appropriate to define settlement boundaries, or parts of settlement boundaries on the basis of land ownership or title where there is no physical feature which identifies the proposed boundary line. Arbitrary sub-division of curtilages should be avoided where this does not relate to clearly defined physical features: Abbots Manor Farmhouse, Leckford for example, has an old walled garden which forms part of the curtilage and is physically defined yet the walled garden has been excluded from the current settlement boundary.

Question 11

Should settlement boundaries be drawn more tightly or more loosely, and perhaps reflecting which tier settlement is within the settlement hierarchy?

We have commented in detail on the settlement hierarchy in response to questions 4-7 above.

Question 12

Should settlement boundaries provide further opportunities for further limited growth beyond infill and redevelopment?

The role that each settlement (or tier of settlements) will play in meeting the identified needs for development in the Borough (housing, employment, commercial and community development needs) will need to be considered as part of the next local plan's spatial strategy. The local plan spatial strategy will need to ensure that the needs of the Borough are met in full and that national planning policy which requires that at least 10% of housing should be delivered on identified sites (our emphasis) of less than 1 ha, is followed. The current local plan spatial strategy has focussed significantly on strategic allocations in or adjacent to the "major centres" of Andover and Romsey and adjacent to "major service centres". The quantum and scale of development allocated to rural villages has been limited to "windfalls, rural affordable housing sites, replacement dwellings, community-led development and re-use of buildings."

The current approach does not, in our judgement reflect the role that managed development in some rural villages could play in improving the sustainability of rural settlements; meeting overall housing and employment needs and contributing to the smaller sites' requirement. Nor does it reflect the changing nature of demand for housing driven by Covid19 and the increase of home working

In light of the above we consider that a differentiated approach to the identification of settlement boundaries which allow for a level of growth beyond infill and redevelopment will be required. This differentiated approach will need to take account of the differing roles of settlements within the spatial strategy and the settlement hierarchy. It will also need to allow for differentiation of approach for settlements within the same tier of the hierarchy.

A 'one-size fits all' approach will not be appropriate given the difference which exist within the broad category of "rural villages". These differences relate not only to the scale of villages, but also to:

- i. the availability of development to contribute to the creation of more sustainable rural communities;
- ii. the availability of deliverable development sites;
- iii. the willingness of landowners to bring forward sites for development;
- iv. the appetite of local communities to accommodate new development.

Where it can be demonstrated that the four criteria above are met, then it will be appropriate to define settlement boundaries so as to allow for managed growth of the settlement.

SELF-BUILD HOUSING AND COMMUNITY LED DEVELOPMENT

Question 15

Should self-build housing to be delivered as part of community led development?

Community-led development and self-building housing would not seem to be mutually compatible with the former being led by the wider community to achieve a community aim, and the latter being led by an individual household who aims to fulfil their own specific needs and desires. Therefore community-led development proposals should not be required to include an element of self-build housing.

Self-build housing should be properly provided for by the local authority as required by the Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016). The PPG states the LPA *"must give suitable development permission to enough suitable serviced plots of land to meet the demand for self-build and custom housebuilding in their area."* (Paragraph: 023 Reference ID: 57-023-201760728).

Paragraph 5.113 of the Adopted Local Plan suggests that proposals for community-led development should be led by the parish council or interested parties. In both cases, policy COM9 requires that there should be extensive community involvement and proposals should be supported by the community. It should not be the responsibility of parish councils (or interested parties) to make provision for self-build housing.

The Leckford Estate intends to bring forward a community-led development proposal for Leckford village and has already begun community engagement early in 2020, prior to implementation of the national Coronavirus restrictions. Self-build housing was not identified in the initial community feedback as a local need. The evolving masterplan will consider a number of potential development sites in and adjacent to the village centre however we do not consider that they would be suitable for self-build housing.

One issue which may arise in respect of self-build housing in smaller rural communities is that of ensuring appropriate design and reconciling self-builder's desire for personalisation of their self-build homes with a design approach which is sensitive to the architecture of rural villages. With this in mind, it may be worthwhile to have a policy which requires an appropriate level of community involvement in proposals for self-build housing to ensure that there are agreed criteria for the design of such housing.

TOURISM

The Estate is an active participant in, and contributor to, the tourist economy of Test Valley. It manages a number of important tourist attractions and facilities including:

- The internationally renowned Longstock Park Water Garden;
- Longstock Park nursery, shop and café which are popular with visitors to the area as well as with local residents;
- Leckford Abbas – a John Lewis Partnership hotel, guest lodges and campsite
- Leckford Abbas Golf Courses
- Fishing on the River Test

These facilities cover all three sub-sectors of the tourist economy as referenced in the consultation: visitor attractions, visitor accommodation and hospitality sections.

The Estate therefore welcomes the recognition given to the important role of tourism to the local economy (paragraph 6.8 of the Revised Issues and Options consultation).

The tourism evidence base for the Local Plan is not extensive and there does not appear to be a detailed analysis of the direct and indirect value of tourism to the economy of Test Valley though it is clear that it plays an important role. The Test Valley Hotel Market Fact File (2019), which does form part of the evidence base, indicates that there is capacity / demand to support additional hotel accommodation, and by implication other over-night accommodation, in the northern part of Test Valley.

Question 17

Should a revised tourism policy be more flexible for potential new tourist attractions?

The current Local Plan policy approach is focussed on the safeguarding of existing facilities rather than promoting or encouraging new tourism-related development.

The Estate considers that a more positive policy, which encourages the provision of new tourist facilities, in particular over-night accommodation, and expansion of existing facilities should be included in the next local plan. Such a policy will need to include criteria regarding the scale and nature of facilities and accommodation which will be appropriate in different types of location within the Borough, in particular in rural locations. It should also include criteria which ensure that proposals for tourism-related development are sustainable and acceptable in terms of their visual and environmental impact and ensure that they do not prejudice the wider enjoyment of the natural areas of Test Valley.

The rural areas of northern Test Valley, particularly around the River Test already attract significant numbers of leisure visitors from the UK and over-seas. This has been reflected in high-seasonal occupancy levels of over-night accommodation. Low-impact, environmentally conscious tourism is a growing market and the high-quality natural environment of the Test Valley means that it is well-placed to benefit from the growth in this sector. Whilst it is pre-mature to draw long-term conclusions from the on-going Covid-19 situation, it has high-lighted the importance of the 'staycation' (holidaying within one's own country) and it is likely that this will be a continuing trend.

Question 18

Should a revised tourism policy be more supportive of innovative proposals?

The term "innovative proposals" is not defined and more thought will need to be given as to what types of proposal and activity are intended to be covered by this term. As noted above, however, the Estate believes that there is a case for a positively-framed policy which supports new tourist related development subject to being satisfied that the environmental impacts of such development are not harmful to the inherent qualities of the area in which they are located.

Summary

The Leckford Estate has a long term interest in the communities of Leckford and Longstock 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 both villages. Work has commenced on the preparation of a masterplan for Leckford which represents an opportunity to create new development

develop 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 providing the opportunity to influence the new Local Plan at this early stage. It is clear that in order to meet the council's identified housing needs that a range of site locations and sizes will need to be allocated for development. The distribution of development should seek to achieve the principles of sustainable development in accordance with the National Planning Policy Framework and should not be arbitrarily dispersed according to housing market areas, settlement hierarchy or existing settlement boundaries.

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