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Dear Sir/Madam

**LETTER OF REPRESENTATION TO THE TEST VALLEY DRAFT LOCAL PLAN 2040 REGULATION 18:
STAGE 1 CONSULTATION**

LAND AT BEECH GROVE, WHERWELL

On behalf of Wherwell Farms Limited, Savills is responding to the latest Test Valley Borough Council (TVBC) Draft Local Plan 2040 Regulation 18 Stage 1 Consultation, published February 2022. This representation responds to the Draft Local Plan 2040 document and reiterates the availability of land at Beech Grove (hereafter referred to as 'the site') for residential development as part of the emerging local plan process.

The Site

Land at Beech Grove is an area of circa. 0.52 hectares and is currently part of an agricultural field located between Beech Grove and New Barn Lane, in the northern part of Wherwell. The site is immediately adjacent to the defined settlement boundary, albeit in planning policy terms is identified as being located within the countryside.

The site is relatively unconstrained. It is located in Flood Zone 1 (lowest risk of fluvial flooding), and outside of the Wherwell Conservation Area. No listed buildings are located on site and any nearby heritage assets would be considered accordingly as part of any future development. The site is also located outside of a designated Area of Outstanding Natural Beauty (AONB) or Area of Great Landscape Value (AGLV).

Within the village of Wherwell, there is a number of local facilities, all of which serve the existing community and would be capable of addressing daily needs of future residents of the site. This includes a public house, primary school and pre-school, sports club and bus stop. The facilities are within walking distance of the site.

The proceeding section comments on the Draft Local Plan 2040 document and outlines the site's suitability, availability and achievability for residential development in accordance with the National Planning Policy Framework (NPPF) and the aspirations of the emerging Draft Plan.

Proposals for the Site

The site is being proposed to the emerging local plan for a residential development of eight new homes, equating to 15.4 dph. This is a relatively low density but is proposed to reflect the character and appearance of the existing village, existing development patterns and the site's location on the edge of the current settlement boundary.



It is currently anticipated that the development would be accessed off New Barn Lane, with additional access, transport and infrastructure improvements being made to the road, which would not only benefit the development site but also those currently living, accessing or visiting the village. Specialist transport advice will be sought in relation to this, in addition to early engagement with the Highway Authority.

As highlighted above, the topography of the area means that Beech Grove is at a higher land level than the main village centre and High Street. As a result, the design of the development on the site will take this into account, ensuring a sensitive, appropriate form with a soft edge to the settlement being created by this site. This will be enhanced through the use of appropriate materials and landscaping that will be established in liaison with the Council as the design for the site is progressed. However, the site is well screened from the surrounding rural area and, due to its location adjacent to existing residential properties, future development would be capable of successfully integrating into the settlement without significantly changing the character of the village.

Strategic Housing and Economic Land Availability Assessment 2021 Submission

The site has been included in the previous two iterations of the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA), most recently being recorded under site reference 336 (November 2021) for eight dwellings. This deemed the site to be available and deliverable for eight dwellings.

Delivery of the Site

The NPPF is clear of the importance of ensuring sites are deliverable within the plan period, to ensure housing needs are met and to boost significantly the supply of housing. As part of this, paragraph 68 states that planning policies should identify a sufficient supply and mix of sites *"taking into account their availability, suitability and likely economic viability"*. The paragraph goes on to require that policies identify specific, deliverable sites for years 1-5 of the plan period, and specific, deliverable sites, or broad locations for growth for years 6-10 and, where possible, years 11-15 of the plan.

In this case, the site is considered to be deliverable within years 1-5 of the emerging plan and this was also confirmed in the earlier SHELAA submission made in relation to this site (Ref: 336). In detail, the PPG advises on what factors can be considered in relation to suitability, availability and achievability of a site. These are broadly examined below.

Suitability

Paragraph 018 (Reference ID: 3-018-20190722) of the PPG identifies that a site or broad location can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated. This includes having regard to, for example, national policy and potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation. The PPG also advises that plan makers need to identify different forms of development, where appropriate, taking into account the range of needs for housing, economic and other uses.

In this instance the site is relatively unconstrained and is adjacent to existing residential development within a village setting. The site is well screened by existing planting and is able to gain access to the existing highway network. Any impacts of development, including in terms of infrastructure, landscape and heritage can be appropriately mitigated as a result of the scale of development proposed, size and location of the site, and relationship to the existing settlement.

Availability

Paragraph 019 (Reference ID: 3-019-20190722) of the PPG states that a site can be considered available when, on the best information available, there is confidence that there are no legal or ownership impediments to development. For example, land controlled by a developer or landowner who has expressed an intention to

develop may be considered available. This representation and the earlier SHELAA submission were made on behalf of the landowner. It is therefore clear that the site is available.

Achievability

Paragraph 020 (Reference ID: 3-020-20190722) of the PPG states that a site is considered achievable where there is a reasonable prospect of a development being developed on the site at a particular point in time.

As above, this representation and the earlier SHELAA submission was made on behalf of the landowner. There are no known factors that would prevent the site coming forward and being delivered with a 1-5 year period. On this basis, it is considered evident that the site is deliverable within a five year period and therefore should be included as an allocation in the emerging plan. The site is capable of helping to address local housing needs in the village, delivering a range of homes in a sensitive, well designed manner that will add to the character and prosperity of the village in the long term.

Draft Local Plan 2040 Document

Chapter 1: Introduction

TVBC's overall approach to the Local Plan is welcomed, in relation to the undertaking of a two-staged Regulation 18 consultation, focussing on strategic matters which will be refined prior to the consideration of site-specific matters as part of Stage 2.

Paragraph 1.37 and figure 1.2 state that the adoption of the Local Plan is expected to take place in Q3 2025. It is reiterated that the current timetable is strictly followed and that adoption of the Plan does not slip beyond 2040, to ensure an up to date Plan is available to guide development in the borough. The current Local Plan was adopted in January 2016 and will only leave four years up to 2029, should the draft Local Plan be adopted in 2025.

Chapter 2: Vision, Key Challenges and Objectives

As emphasised in paragraph 2.10, the Government has a target for all local planning authorities to have an up-to-date Local Plan in place by the end of 2023. We therefore stress the importance of TVBC undertaking the work necessary to ensure the timely preparation and adoption of the draft Local Plan and adhere to the timetable set out and avoid any further delay.

In relation to the overall vision, key challenges and objectives, no specific comments are made other than that Wherwell Estates Limited is in complete support of this and recognises the Council's responsibility to adapt in response to challenges relating to climate change, communities, ecology and biodiversity, health and wellbeing, design, housing, economy and transport.

Chapter 3: Spatial Strategy

Wherwell Farms Limited supports the proposed spatial strategy. In terms of responding to the challenges of climate change, the most effective decisions that the planning system and development plan can make, is locating development in the right place to create the conditions for more sustainable transport choices. In order to respond to the challenges of climate change and to develop more sustainable patterns of movement, investment should be directed towards delivering development in close proximity to services, facilities and public transport routes. A strong mix of uses creates the opportunities for journeys to be made on foot and good public transport creates viable alternatives to the car for journeys to work, retail and leisure destinations.

The Council highlights the importance of the settlement hierarchy at paragraph 3.19 of the draft Local Plan 2040 document. The spatial approach adopted in the Regulation 18 follows the pattern of the settlement hierarchy, which is identified in terms of access to services and facilities within each settlement or in nearby larger towns or villages. This approach is considered to be in line with the NPPF which states that strategic

policies should set out an overall strategy for the pattern and scale of development and that the purpose of the planning system is to contribute to the achievement of sustainable development.

The site is currently identified within the countryside, albeit, adjacent to the existing settlement boundary of Wherwell. This is classified under emerging policy SSP1 as a Tier 4 settlement. It is noted that the settlement hierarchy is a key policy to delivering the spatial strategy and the draft Local Plan document sets out that the next stage of the regulation 18 consultation will evolve to include guidance on the level, type and scale of growth at each tier in the hierarchy.

In line with paragraph 3.22, Tier 4 settlements include those that have five or less of each of the key facilities and have a public transport service. It is recognised that the site is within close proximity to a few of these key facilities. Notably, the site is within a five minute walking distance to the nearest bus stop and less than a 10 minute walk to the local primary school.

A minor extension to the existing settlement boundary of Wherwell to include the site to allow for additional dwellings, would not adversely alter the extent of the built form within the settlement. Currently, the settlement boundary includes land immediately south of the site and extends marginally to the north east. The infilling of this gap to the west of New Barn Lane would not detract from the character and form of the settlement, rather, it allows for a logical extension to the existing settlement boundary which would enable the delivery of new homes.

Chapter 4: Strategic Policy Framework

Strategic Policy 1 – Countering Climate Change

Wherwell Farms Limited is in support of Strategic Policy 1, which outlines that development will deliver a net zero carbon future through both mitigation and adaptation to climate change. In line with this, Wherwell Farms Limited acknowledges the importance of this in relation to the Government’s target to achieve net zero by 2050.

It will be useful to understand the policy requirements TVBC is seeking to introduce, as part of the next round of consultation in relation to energy and climate change. In particular, paragraph 4.39 outlines the requirement for development to deliver a minimum 10% net gain in biodiversity in line with the Environment Act 2021. We await the details on how this will be applied, but note that this may result in viability implications for future developments which could potentially reduce the developable area of sites. This may therefore also impact upon the number of sites needed by the Council to meet its development needs.

At paragraph 4.41, the Council has outlined that it will need to consider the need for local gaps, in order to help conserve the identity and character of communities by retaining space between settlements. Wherwell Farms Limited considers that the preservation of gaps is vital to ensure the continued maintenance of settlement’s character and pattern, preventing settlement coalescence and protecting separate settlement identities. The site is not located in a designated local gap and represents an ideal opportunity to contribute to the housing need, albeit for small scale residential development without adversely impacting on a local gap. Furthermore, a small extension to the settlement boundary up to New Barn Lane creates a clearly defined settlement boundary, which does not extend beyond the existing built form of Wherwell.

Strategic Policy 2: Delivering Healthy, Well-Designed Development

This policy states that the Council will require all development to achieve high quality design which will conserve and enrich the character and identity of the Borough’s towns, villages and landscape. Wherwell Farms Limited is in support of the principles outlined under Strategic Policy 2 and would seek to design any future proposals in accordance with the criteria set out under this policy.

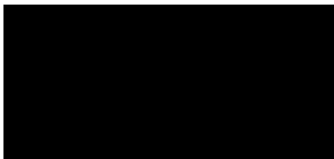
Conclusion


Wherwell Farms Limited supports the Council in its preparation of the emerging Local Plan. The adoption of the Local Plan in due course will allow for well-planned and proportionate growth in the borough. This letter of representation responds to the TVBC Regulation 18 Stage 1 consultation and promotes land at Beech Grove, Wherwell on behalf of Wherwell Farms Limited for residential development.

A modest development of eight dwellings could serve to provide much needed new homes within Wherwell, whilst still retaining and respecting the rural density, character and appearance of the settlement. The site can deliver these dwellings within the early part of the plan period, bolstering the early supply of housing within the first five years of the plan.

I would highlight that Savills and Wherwell Farms Limited reserve the right to comment fully on all aspects of the plan going forward, including on any evidence base documents and the Regulation 18 consultation that may not have been addressed in this response.

Yours faithfully

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Savills Planning