

Planning Policy

From: Planning Policy
Sent: 11 February 2019 09:37
To: Planning Policy
Attachments: written representations to test valley borough council's issues and options consultation.pdf

From: fay eames
Sent: 14 September 2018 15:35
To: Planning Policy
Subject: Response to Issues and Options Consultation on behalf of The Leckford Estate

Dear Planning Policy Team,

Please find attached our written representations which have been prepared on behalf of The Leckford Estate in response to your Issues and Options Consultation.

Please do not hesitate to contact me if you have any further questions. I would be grateful if you could confirm receipt of our submission.

Kind regards,

Fay

Turley

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The Waitrose farm
Leckford Estate

Written Representations to Test Valley Borough Council's
Issues and Options Consultation on behalf of The Leckford
Estate

September 2018

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Client

Our reference
WAIW3004

10 Sep 2018

Introduction

1.1 These representations have been prepared by Turley on behalf of The Leckford Estate in response to Test Valley Borough Council's Issues and Options Consultation Document (hereafter referred to as the 'Consultation Document').

1.2 Our consultation response focusses on the matters of most relevance to The Leckford Estate in the context of our client's interests in the villages of Leckford and Longstock. These matters are covered in the following order within this response to the Consultation Document:

- **Housing requirement** – responds to questions 4 and 5 and provides comments on the supply of housing across the Borough, including in relation to addressing the housing needs of rural areas in light of evidence outlining their significant economic contribution to the national economy;
- **Spatial distribution of new development** – responds to questions 7 and 8 and provides comment on the proposed approaches to distributing development and our preferred approach;
- **Settlement boundary review** – responds to question 9 and provides comment on how the settlement boundaries should be defined in the next Local Plan;
- **Affordable housing** – responds to question 12 and provides evidence of the need to support further housing in rural areas and the justification for allowing market housing on rural affordable exception sites;
- **Extensions and replacement of rural dwellings** – responds to question 17 in relation to whether the size of replacement dwellings should be restricted within the new Local Plan;
- **Definition of rural workers** – responds to question 21 in relation to whether the new Local Plan should provide a definition of 'rural worker';
- **Working in Test Valley** – responds to questions 26 and 27 in relation to small-scale commercial development opportunities within The Leckford Estate.

1.3 It is noted that the timescales for the preparation of the emerging Local Plan highlights that the Submission version of the Local Plan will be reached after 24th January 2019, by which time the revised National Planning Policy Framework (NPPF), which was published in its final form in July 2018, will come into effect. Therefore, for the purposes of this consultation response we have considered it appropriate to assume that the revised Local Plan will be evaluated against the policies of the revised NPPF.

2. About The Leckford Estate

- 2.1 The Leckford Estate comprises 4,000 acres and spans the villages of Leckford and Longstock in Test Valley, Hampshire. The Estate was first purchased in 1929 by John Spedan Lewis, founder of John Lewis and Partners, and has been farmed for nearly 90 years. Known as 'The Waitrose Farm', it is the only retailer owned farm in the UK and supplies produce to Waitrose stores across the country.
- 2.2 In addition to agricultural activities, The Leckford Estate is diverse and its commercial interests span property, retail, horticulture and leisure activities. In total, the Estate employs 150 people and owns 98% of the properties in Leckford and 30% of the properties in Longstock. They are therefore a significant employer and driver of economic growth within the Borough.
- 2.3 The Leckford Estate's unique position as a substantial landowner of property and land within both Leckford and Longstock enables the Estate to take a holistic view of the housing and employment needs of these settlements and can provide land for the delivery of housing and rural employment needs.
- 2.4 In December 2017, a Property Strategy for The Leckford Estate was approved by John Lewis and Partners. The Property Strategy sets out the priorities for investment, land use and real estate for the next five years in order to improve the viability of the Estate, enhance local communities in Leckford and Longstock and protect and enhance the character of the area, including its heritage assets within the ownership of the Estate.
- 2.5 Leckford in particular 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 villages of both Leckford and Longstock to ensure their longevity for the longer term, whilst also contributing towards meeting local housing and employment needs within the Borough, including provision of affordable housing.

3. Responses to Local Plan Questions within the Issues and Options Consultation Document

- 3.1 This section sets out our client's response on the questions raised within the Consultation Document and are considered the most relevant to our client's interests within The Leckford Estate.

Housing Requirement

Q4: Should the Local Plan's housing requirement be consistent with Government's standard methodology? Do you have any evidence to support your view?

- 3.2 The introduction of a new standard methodology for calculating housing needs through the revised NPPG was one of the 'radical reforms' proposed by Government in response to the national housing crisis. This was aimed at minimising delay in plan-making and ensuring that local authorities cannot 'duck potentially difficult decisions' by an alternative methodology.

- 3.3 Whilst there remains a degree of uncertainty as to the final of the standard methodology, which is due to be published shortly, the revised NPPF has confirmed that this methodology will be used to set minimum housing need through future Local Plans beyond January 2019.

- 3.4 Paragraph 60 states that:

"to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for"

- 3.5 Whilst the NPPF does not clarify what circumstances would be considered 'exceptional' to justify an alternative approach being used, the Government has previously expressed an intention to make clear through Planning Practice Guidance¹ that:

Any deviation [from the standard method] which results in a lower housing need figure... will be subject to the tests of soundness and will be tested thoroughly by the Planning Inspectorate at examination. The plan-making authority will need to make sure that the evidence base is robust and based on realistic assumptions, and that they have clearly set out how they have demonstrated joint working with other plan-making authorities. In such circumstances, the Planning Inspector will take the number from the standard method as a reference point in considering the alternative approach.

- 3.6 Accordingly, the standard methodology should form the basis of calculating housing need within the Borough of Test Valley during their next Local Plan period to 2036 and

¹ MHCLG (2018) Draft Planning Practice Guidance, p26

in light of clear national policy and guidance, and in the absence of evidence to the contrary, this is considered an appropriate approach.

- 3.7 Paragraph 60 of the NPPF states that housing need calculated from using the approach outlined within the standard methodology should be used to determine the ***'minimum number of homes'***². Paragraph 119 of the NPPF also confirms that *"Local planning authorities should take a ***proactive role***³ in identifying and helping to bring forward land that may be suitable for meeting development needs'*.
- 3.8 Therefore, the housing need calculated from using the standard method should not be used as a cap for preventing further suitable, available and deliverable sites from coming forward to increase housing supply within the Borough, particularly where this will contribute towards the overarching economic, social and environmental objectives to achieving sustainable development, as outlined within paragraph 8 of the NPPF.
- 3.9 Of relevance is also the strengthened emphasis within the revised NPPF on the operation of the Duty to Cooperate through paragraph 27, which requires local authorities to demonstrate effective and on-going joint working through the preparation of Statements of Common Ground (SoCG) which document the cross-boundary issues being addressed and progress in cooperating to address these.
- 3.10 We wish to highlight that Test Valley Borough Council's revised Local Plan should take all necessary steps to ensure that all opportunities for accommodating any unmet housing need from neighbouring authorities have been fully considered, which may result in an increase to the housing figure derived using the standard methodology. As part of this process, it will be necessary to ensure on-going joint working with neighbouring authorities and the preparation of SoCG at the earliest opportunity during the plan making process to ensure that the Local Plan is positively prepared and meets the 'tests of soundness' outlined in paragraph 35 of the NPPF.
- Q5: Should the Local Plan increase its housing requirement to help support economic growth? If yes, do you have any evidence to support this?***
- 3.11 In June 2018 the Government published its Industrial Strategy for the UK 'Building a Britain fit for the future'. Respondents to the Industrial Strategy Green paper consultation highlighted the importance of housing to the economic success of the UK's cities and regions and accordingly, the final version of the Industrial Strategy outlined a comprehensive policy package that aims to raise housing supply.
- 3.12 The NPPF states that the planning system has an economic objective to achieving sustainable development (alongside social and environmental objectives) and states that this objective aims *'to build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure'*.

² Turley emphasis

³ Turley emphasis

- 3.13 Of relevance to predominantly rural Boroughs such as Test Valley is recent research undertaken by the Institute for Public Policy Research⁴, which notes the significant contribution the rural economy makes to the UK's overall performance. It states that rural areas account for 16.4% of GVA (Defra, 2018), including innovative businesses in agriculture, tourism, advanced manufacturing and energy. These sectors will play a key part in meeting the goals set out in the government's Industrial Strategy.
- 3.14 The publication highlights that a lack of affordable housing in these areas could impede efforts to achieve the objectives of the Industrial Strategy because employers in rural areas can struggle to address skills gaps and find employees in the absence of sufficient labour, poor transport links and long commutes. It goes on to say that a decline in the working age population has the potential to further intensify this problem and this could accelerate if communities are not providing homes that local workers can afford. This is a problem which The Leckford Estate has faced when recruiting for employees to work on The Waitrose Farm.
- 3.15 In light of these challenges, The Leckford Estate would be supportive of increasing the housing requirement within the Borough which would support the economic growth and vitality of rural areas.
- 3.16 It is also relevant to note that housing numbers should also be influenced by the economic context and the aspirations for employment growth both within Test Valley and in the wider sub region. This may require a housing figure that extends beyond the figure derived from the standard methodology. Such additional growth should be welcomed as a means of supporting prosperity and driving the economy of the area. This requires a positive and ambitious approach and our response to planning for housing growth across the Borough.

Spatial distribution of housing across the District

Q7: Are there any other approaches to distributing development across the Borough that we should consider?

Q8: Do you have any comments on the approaches suggested?

- 3.17 The current development strategy for Test Valley Borough concentrates new development to existing main settlements, such as Andover and Romsey, where services and jobs are most accessible. The Local Plan review presents the opportunity to review this approach and to consider the most suitable strategy for distributing new development across the Borough for the new Local Plan period up to 2036.
- 3.18 Paragraph 78 of the revised NPPF states that:

"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities and that 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"

⁴ A New Rural Settlement – Foxing the Affordable Housing Crisis in Rural England, June 2018

- 3.19 The villages of Leckford and Longstock are two examples of existing settlements which would benefit from the identification of additional opportunities for small-scale growth which would help to sustain both villages and their facilities in the longer term. As identified in paragraph 5.12 of the Consultation Document, housing in rural areas is becoming increasingly unaffordable to families and young people and there are also those who wish to stay in rural villages by downsizing to smaller homes, yet the supply may not be available. Paragraph 5.13 goes on to acknowledge that this affects the mix of people living in these areas with more people leaving to find affordable accommodation elsewhere, which could adversely affect longstanding family and social connections and, importantly, undermine the identity of settlements.
- 3.20 Leckford in particular is an example of a rural community which has been affected by this decline and is typified by an ageing population which has affected the sustainability of services and facilities in the longer-term.
- 3.21 Paragraph 77 of the NPPF states that:
- “In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs...”*
- 3.22 Allowing a more even distribution of development across the Borough and accommodating an appropriate level of growth in rural villages would provide the opportunity for growth in rural settlements such as Leckford and Longstock which would sustain their vitality in the longer term and also allow people the choice to live in the communities they have connections to.
- 3.23 The Consultation Document makes reference to four approaches to distributing new development across the Borough.
- 3.24 We raise concern in relation to two of these suggested approaches. The first is in relation to ‘Community Led Distribution’. The distribution of new development under this option would be informed at the outset by the number and location of parishes which have embraced community led planning and are in the process of producing a Neighbourhood Plan, within which would be a housing figure which they would be expected to bring forward.
- 3.25 Whilst any residual figure of housing need would be distributed across the Borough, we consider this starting point to be an unreliable approach to meeting the development needs of the Borough as a whole as it is dependent upon the number of parishes which have chosen to embrace community led planning. Such an approach may result in development being favoured in those parishes which have the time and financial means to prepare a Neighbourhood Plan rather than the most suitable and sustainable locations for new development, as set out within Paragraphs 7 and 11 of the NPPF.
- 3.26 Additionally, not all areas of the Borough have the necessary population threshold which would allow for a parish council to be established and Leckford village is an example of this. Such an approach to the distribution of new development would discriminate against villages such as Leckford which, in the absence of a parish council, would need to form a separate, accountable and legal entity in order to progress a Neighbourhood Plan.

3.27 We would also raise concern in relation to the proportionate approach to distributing new development on a pro rata basis based on the population of the parish as a percentage of the Borough's total population. For example, if a parish's population is equivalent to 5% of the Borough's total population, the settlement would receive 5% of the total new development over the plan period. Paragraph 119 of the NPPF states:

"Local planning authorities, and other plan making body, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them"

3.28 A proportionate approach to distributing development across the Borough could result in an outcome where suitable sites for new development are not considered because the size of the development proposed would exceed its proportionate percentage threshold. Such an approach would restrict the local planning authority's ability to take a proactive role in identifying and helping to bring forward land that may be suitable for meeting the development needs of the Borough and would therefore conflict with the requirements of paragraph 119 of the NPPF.

3.29 The Leckford Estate would be supportive of a strategy which would enable small-scale growth in rural areas to come forward where there are genuine opportunities to do so that are suitable, available and deliverable during the next Local Plan period to 2036. This would include the identification of new sites of varying sizes for development, including small and/or medium sized sites which would support the vitality of rural areas and provide for the extensive affordable needs.

3.30 Paragraph 68 of the NPPF requires that local authorities identify land to accommodate at least 10% of their housing requirement on small and medium sized sites and states that:

"small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly"

3.31 Such an approach could be part of a wider strategy which would seek to distribute new development more evenly across the Borough rather than predominantly concentrating development in locations near to existing main settlements. We consider that this approach would enable rural villages the opportunity to grow and prosper, respond to local housing needs and support their vitality in the longer term in accordance with paragraphs 77 and 78 of the NPPF.

3.32 We wish to also highlight at this early stage that there are some sites within Longstock that are within the ownership of the Estate which fall below the size threshold of 0.25ha stipulated by TVBC to be submitted and considered as part of the open 'Call for Sites' process. Such sites are adjacent to the settlement boundary and would form a logical, small-scale extension to its boundary which would be in keeping with the existing pattern of development within the village.

3.33 For rural settlements such as Leckford and Longstock we question whether such a threshold is appropriate, for it denies the opportunity for small-scale sites to come forward which may be an appropriate scale of development for the village. In setting a

threshold, we consider that this restricts the local planning authority's ability to take a proactive approach in identifying and helping to bring forward land that may be suitable for meeting the development needs of the Borough and would therefore conflict with the requirements of paragraph 119 of the NPPF.

- 3.34 We would suggest that either the threshold is removed or that consideration be given during the preparation of subsequent stages of the Local Plan to a site specific policy which would allow flexibility for such sites to come forward if they are in accordance with other national and local plan policies.

Settlement boundaries

Q9: How should the settlement boundaries be defined in the next Local Plan?

- 3.35 Our client has submitted four sites within the villages of Leckford and Longstock in response to Test Valley Borough Council's 'Call for Sites' process which would facilitate small-scale growth in both villages. These sites are included within Test Valley Borough Council's Strategic Housing and Economic Land Availability Assessment (SHELAA) as follows:
- Charity Farm Paddocks, Longstock. SHELAA Reference: 129 (outside of village settlement boundary)
 - Village Centre, Leckford. SHELAA Reference: 128 (outside of village settlement boundary)
 - Abbots Manor Farmyard, Leckford. SHELAA Reference: 131 (within the settlement boundary and therefore there is a presumption in favour of development for this site)
 - Baker's Farm, Leckford. SHELAA Reference 130 (existing building located outside of village settlement boundary)
- 3.36 Whilst we recognise that the Issues and Options Consultation does not identify specific sites to accommodate development at this stage, we request within these representations that consideration be given to reviewing the settlement boundaries of the villages of Leckford and Longstock to accommodate additional growth and spread the distribution of new development across the Borough.
- 3.37 Specifically, we wish for consideration to be given to including Charity Farm Paddocks, the Village Centre site, and Bakers Farm within the settlement boundaries of the village as part of the process for preparing the Preferred Options consultation version of the Local Plan.
- 3.38 These sites are being promoted for the development of both market housing and affordable housing to meet local needs. Affordable housing may also include accommodation for rural estate workers that work within The Estate. The Abbots Manor Farmyard site is also being promoted for small-scale employment uses which would enhance the existing village centre and provide services/facilities for new and existing residents.

3.39 We also wish to flag at this stage that Abbots Manor Farmyard and the Village Centre Site, whilst partly falling within and outside of the settlement boundary, has the potential to come forward as one holistic scheme and therefore should be considered as such. An indicative scheme has already been shared with the Council reflecting this potential and this scheme will be developed further and shared with the Council in due course.

Affordable housing

Q12: Should we allow market housing on rural affordable exception sites?

3.40 There have been a number of recent publications which have highlighted the crisis of 'affordable' housing for workers in rural areas and the consequences that this can have for rural communities. One of the most recent publications is from the Institute for Public Policy Research – "a New Rural Settlement – Fixing the Affordable Housing Crisis in England" (June 2018). A summary of the key findings are:

- The average rural house price is around £19,000 above the average for England as a whole, at £320,700 compared to £301,900, and is more than £87,000 higher than the urban average excluding London (£233,600)
- Rural housing is less affordable to local people than in most urban areas. A family with one child, earning one full time and one part-time median wage in a mainly or largely rural area would spend 31% of their income on rent, compared to 26% or 19% in most urban local authorities. Only in major conurbations is this higher.
- Only 8% of the housing stock in rural areas is affordable compared to 20% in urban areas, and current delivery is failing to provide enough new homes.
- Rural areas are set to see significant reductions in their working age populations over the coming decades. Between 2014 and 2038, the working age population in rural areas is projected to decline by 75,000 people while the population aged over 65 will grow by around 1.5 million. By 2038, there will be 63 people aged over 65 for every 100 working aged people. This is significantly higher than in urban areas, where there will be just 31 people aged over 65 to every 100 working aged people.
- In 2016/2017, only 1,071 homes were brought forward on rural exception sites. This is equivalent to 10% of all the affordable homes built in mainly and large rural authorities and more than a quarter (26%) of those in settlements of less than 3,000 people. However, more than half of these were developed by just five local authorities, with one authority – Cornwall – accounting for 400 homes.

3.41 These findings highlight the importance of identifying sufficient land for affordable and long-term accommodation in rural communities in order to retain young, economically active people, maintain essential services and minimise the risk of terminal decline in villages.

- 3.42 The report also highlights that Brexit represents both a challenge and an opportunity for rural areas. Rural policy has been determined considerably by tradition and the Common Agricultural Policy (CAP) in recent decades. The publication states that the decision to leave the EU therefore represents an opportunity to think rural policy anew. However, it also states that there is also a pressing need to ensure that rural communities are not left behind and are able to help meet the UK's wider economic and productivity challenges over the next few years and that key to that aspiration is getting housing policy right in rural areas where increasingly the working-age population, faced with high housing costs and lower wages than in many urban areas, simply cannot afford to live.
- 3.43 The Leckford Estate, with its landholdings in the villages of Leckford and Longstock, has identified opportunities for new, small-scale residential development. These have been submitted for consideration in response to TVBC's open 'Call for Sites' consultation. These sites offer opportunities for affordable housing to be delivered on small-scale sites which can contribute to meeting local affordable housing needs.
- 3.44 In order to deliver these sites, it may be necessary to consider bringing forward an element of market housing to facilitate overall site viability. Accordingly, in response to Question 12 of the Consultation Document the Estate would be supportive of allowing marking housing on rural affordable exception sites. Such an approach is also in alignment with the requirement of national policy and paragraph 77 of the NPPF states that:
- "In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this"*
- 3.45 The Leckford Estate, as a significant land and property owner within the villages of Leckford and Longstock, are able to take a holistic view of the housing and employment needs of each of these settlements and are able to deliver land for affordable housing needs across multiple sites. The Estate would also wish for consideration to be given to enabling policy to be flexible and to take into account instances where multiple sites are owned by a single landowner and can be looked at collectively to deliver new housing that contributes to local need. We request that policy provides the flexibility whereby market housing could be provided on one site and the necessary affordable housing contribution delivered on another if this would enable the delivery of the optimum number of new market and affordable homes in a way which is considered the most viable, taking into account site constraints.
- 3.46 The publication also recognises the significant contribution that the rural economy makes to the UK's economic performance and highlights that employers in rural areas can struggle to address skills gaps and find employees in the absence of sufficient local labour, poor transport links and long commutes. A decline in the working age population has the potential to further intensify this problem and this could be accelerated if communities are not providing homes that local workers can afford.

Extensions and Replacements of Rural Dwellings

Q17: Should we restrict the size of replacements and extensions to dwellings in the countryside to keep a range of dwellings

- 3.47 The NPPF is clear in Chapter 11 that *'planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or "brownfield" land'*.
- 3.48 Accordingly, we do not considered that it would be in accordance with national policy to restrict the size of replacements dwellings in the countryside where this could work against the requirements of national policy in making the most effective use of land to meet local housing need.

Definition of 'rural workers'

Q21: Should the Local Plan set out a definition of rural worker? And if so what should it include?

- 3.49 The Leckford Estate provides affordable accommodation for rural workers who work within the Estate to enable them to live near to their place of work. This is a necessity for many of the workers, particularly those who work in the agricultural industry, which requires farmers to be near to their place of work in order to care and manage farm operations.
- 3.50 As aforementioned, the average rural house price in the UK is around £19,000 above the average for England as a whole when compared with urban areas and the number of affordable housing units in general is lower. Due to the need for rural workers to be close to their place for work it is essential that the Estate provides affordable housing that local workers can afford.
- 3.51 Providing accommodation for the rural workers within the Estate is an ever increasing challenge due to the availability of appropriate housing stock within their ownership and the costs associated with bringing vacant properties, many of which are Listed and within a Conservation Area or its setting, back into use.
- 3.52 Any definition which is set out in the new Local Plan would need to provide flexibility and be able to cover the full range of 'rural workers' within the Estate both now and in the future. In doing so, the definition would also need to be responsive and have the ability to consider instances where the definition would need to be widened if evidence can be put forward within any future planning application to do so.

Commercial development in rural areas

Q26: Should we allocate more land to allow more choice and flexibility to the market?

- 3.53 The Leckford Estate would be supportive of the new Local Plan identifying a range of suitable sites of varying sizes across the Borough which would support the economic growth of both urban and rural areas. The Leckford Estate has submitted in response

to TVBC's open 'Call for Sites' consultation a site at Abbots Manor Farm in Leckford village, which it is envisaged to be able to contribute towards meeting local housing and employment needs.

- 3.54 The Leckford Estate is a significant employer within the Borough. The new Local Plan should facilitate the *'sustainable growth and expansion of all types of business in rural areas'* and also *'should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements'*, as outlined within paragraphs 83 and 84 of the NPPF.

Q27: What are your views on promoting smaller workspaces within the Borough?

- 3.55 The Leckford Estate would be supportive of promoting smaller working spaces within the Borough to support the growth of small businesses, particularly in areas where it would support the economic growth of rural areas.
- 3.56 The Estate would be supportive of policies which enable smaller workspaces to come forward as part of new development or allocate specific sites for this type of employment use, however the need for new employment space must also be market driven and therefore the employment policies within the Local Plan must be capable of respond to market changes.
- 3.57 The Abbots Manor Farmyard site, which is being promoted for residential and employment uses through the Local Plan review process, is a site which may offer the potential to accommodate smaller working spaces subject to further masterplanning and viability testing.
- 3.58 With its significant property assets within both the villages of Leckford and Longstock, The Estate is also considering the development potential of former agricultural buildings which are surplus to requirement and could benefit from conversion to bring them back into use. Such uses could include provision of smaller working spaces and therefore The Estate would be supportive of emerging employment policies in the new Local Plan which would enable development to come forward in this way.

4. Conclusions

- 4.1 This response has outlined the response to the main issues of interest to The Leckford Estate within TVBC's Issues and Options Consultation. We are supportive of the Council's review of the Local Plan and look forward to working with the local planning authority in a cooperative manner during this process and in response to subsequent consultations on the emerging Local Plan.
- 4.2 We would be happy to discuss the issues raised within this response before the publication of the Preferred Options version of the Local Plan if this would be helpful to informing emerging planning policy and strategy for the distribution of growth across the Borough.

Turley