Dear Test Valley Borough Council,

Longstock Parish Council welcomes the opportunity to respond to the Regulation 18 Draft Local Plan. We support the overarching aim of delivering sustainable development across the borough. However, we have significant concerns regarding the proposed spatial strategy, housing allocations, settlement hierarchy, and the implications for rural communities, particularly Longstock, Houghton and Stockbridge.

These concerns are summarised as follows;

1. Settlement Hierarchy and Misclassification

We strongly object to the inclusion of **Stockbridge as a Tier 2 settlement** and the associated reclassification of parts of **Longstock and Houghton** under this designation. This is:

- **Factually incorrect**: Roman Road and Houghton Road lie within Longstock parish, not Stockbridge.
- **Procedurally flawed**: No formal consultation or documentation has been provided to justify this change.
- **Contrary to the Localism Act 2011**: It undermines community-led planning and the integrity of Neighbourhood Plans.

Stockbridge does not meet Tier 2 criteria. It lacks:

- All key facilities
- Public transport connectivity
- Infrastructure resilience

It is also constrained by:

- Flood risk zones
- Environmental designations
- Heritage assets requiring protection under Chapter 16 of the NPPF

We request immediate rectification of this misclassification and formal clarification from TVBC.

2. Housing Allocations in Tier 4 Settlements

We object to the proposed allocation of **100 dwellings across SHELAA Sites 237 and 479**, which lie within **Tier 4 settlements** of Longstock and Houghton. These allocations are:

- **Incompatible with the spatial strategy**, which prioritises growth in higher-tier settlements.

- **Unsupported by local evidence**: Longstock's Housing Needs Assessment identifies a need for just **12 affordable homes**, including 2-bed properties and 1-bed bungalows for older residents.
- **Contrary to the NPPF Paragraphs 29–30**, which emphasise the role of Neighbourhood Plans in shaping development.

SHELAA sites are **not allocations** and do not guarantee suitability or community support. Their premature inclusion undermines local decision-making and the principles of subsidiarity.

3. Infrastructure Deficiencies

The proposed scale of development risks overwhelming existing infrastructure. Residents already report pressure on:

- Schools and GP surgeries
- Transport and parking
- Water and drainage systems

TVBC's boroughwide approach to housing delivery **ignores localised constraints** and risks enabling developer-led schemes in unsuitable locations. Without infrastructure-led development, growth will be unsustainable and erode public trust in the planning system.

4. Environmental and Legal Constraints

Sites 237 and 479 are heavily constrained by:

- Proximity to the **River Test**, a protected chalk stream
- Multiple **Sites of Special Scientific Interest (SSSIs)**
- **Level 1 floodplain** designation

These trigger obligations under the **Habitats Regulations** and pose risks to:

- Water quality and biodiversity
- Heritage assets and rural landscape
- The tourism economy, which depends on environmental integrity

5. Economic Impact on Tourism and Agriculture

The proposed development threatens two key economic sectors:

Tourism:

- Stockbridge's visitor economy relies on fly fishing, countryside recreation, and heritage charm.

- Development risks visual degradation, increased traffic and loss of heritage value.

Agriculture:

- Sites lie within active farmland essential to local food production and rural employment.
- Development would displace productive land and strain shared infrastructure.

6. Housing Type and Affordability

Evidence from similar developments suggests that sites like 237 and 479 will deliver **large, executive-style homes**, not affordable housing. This trend:

- Excludes local workers and young families
- Attracts external buyers from urban centres
- Weakens the local workforce and economic resilience

Without a mix of housing types tailored to local income levels, these developments will deepen commuting patterns and undermine the live-work balance.

Recommendations

To ensure a sound, sustainable, and community-led Local Plan, we urge TVBC to:

- **Remove Sites 237 and 479** from strategic allocations
- **Correct the settlement boundary misclassification** and respect Longstock and Houghton's Tier 4 status
- **Pause allocations in Neighbourhood Plan areas** until communities have had the opportunity to consult and prepare
- **Support parish councils** in delivering locally appropriate housing solutions
- **Avoid imposing minimum housing numbers** without meaningful consultation and evidence of infrastructure capacity
- **Safeguard the borough** from absorbing disproportionate unmet housing need from neighbouring authorities
- **Preserve the economic diversity and rural character** of the Test Valley

In Conclusion, the Regulation 18 Draft Local Plan, as currently proposed, risks undermining its own sustainability goals. It misrepresents settlement boundaries, disregards local evidence and threatens the integrity of rural communities. We call on TVBC to revise its approach in line with national policy, legal obligations and the principles of localism.

Longstock Parish Council

Longstock Parish Councils' Response to the Revised Regulation 18, Local Plan – June 2025

1.1. The draft Test Valley Local Plan will set out how development will be planned and delivered across Test Valley. This includes the level of growth for housing, employment and the infrastructure required to deliver this to support the borough's communities and meet their future needs, whilst also protecting the local environment.

LPC's Response:

The ambition outlined in the draft Test Valley Local Plan to support future communities through housing, employment and infrastructure is commendable however, the proposed 76%–78% increase in housing delivery raises serious concerns about sustainability and proportionality.

A housing expansion of this magnitude, without a corresponding increase in local employment opportunities, risks creating a commuter borough. This not only undermines the goal of fostering self-sufficient communities but also places additional strain on regional transport networks and contributes to environmental degradation through increased travel.

Our current infrastructure; roads, public transport, healthcare services, emergency response and utilities are already under pressure. Increasing the delivery of housing without first addressing these foundational systems will exacerbate existing issues and compromise quality of life for both new and existing residents.

The plan lacks clarity on how such significant infrastructure upgrades will be financed. Without a detailed and credible funding strategy, the promise of balanced growth remains speculative. Residents deserve transparency on where investment will come from and how it will be allocated.

Development must be holistic. Housing growth should be paced and aligned with employment expansion and infrastructure readiness, otherwise we risk building communities that are neither resilient nor sustainable.

We urge the planners to reconsider the scale of housing proposed and ensure that growth is genuinely supported by the necessary economic and structural foundations.

***1.5 The National Planning Policy Framework (NPPF)** sets out the Government's policies on planning matters. It sets out what a Local Plan should include and how this should be considered. All Local Plans need to be in conformity with the NPPF to be able to progress successfully to Adoption and be implemented.*

LPC's Response:

Agreed

1.13. *Whilst we are required by national policy to look over a 15-20 year time period for the draft Local Plan, it means we are planning to meet housing needs over a timeframe that far exceeds the existence of Test Valley Borough Council. The strategic planning decisions will be made by the Mayoral Combined authority and the new unitary authority anticipated to come into existence by April 2028.*

LPC's Response:

What is the impact of Devolution and Local Government Re-organisation on housing targets for the Test Valley? Will the current targets be overwritten, will this element of the emerging Local Plan be revisited again in 2 years' time?

2.3. *At the heart of the NPPF is a presumption in favour of sustainable development. This reflects the requirement, in the Planning and Compulsory Purchase Act 2004 (as amended), that Local Plans are prepared with a view to 'contributing to the achievement of sustainable development'. It confirms that the planning system has three overarching and interdependent objectives: economic, social and environmental. The NPPF definition of sustainable development states that 'sustainable development is development that meets the needs of the present without comprising the ability of future generations to meet their own needs'.*

LPC's Response:

See response to 1.1.

2.9. *One part of the Government's planning reforms is the introduction of National Development Management Policies. These would avoid Local Plans having to repeat nationally important development management policies. The Government is intending to consult on National Development Management Policies this year ahead of finalising its position. We will take account of this prior to finalising our draft development management policies at the Regulation 19 stage.*

2.10*. At the same time as progressing potential planning reforms, the Government is clear that local authorities should be continuing with reviewing and updating their local plans and not await the new plan making system.*

2.11. *If further changes were to be made to the current plan making system, this could present further risks for the preparation of the draft Local Plan. We may need to pause plan preparation and consider any implications for taking the draft Local Plan forward.*

LPC's Response:

The expectation for local authorities such as Test Valley Borough Council (TVBC) to prepare and consult on emerging Local Plans, while national planning policy remains in flux, particularly amid ongoing local government reorganisation and the Planning and Infrastructure Bill not yet receiving Royal Assent, is deeply problematic. Frequent and unpredictable changes to planning policy, often occurring mid-

consultation or during critical evidence-gathering phases, severely hinder the councils' ability to develop coherent, legally robust and community-supported strategies. In the context of structural reform, this instability exacerbates existing pressures, generating uncertainty around governance arrangements, resource planning and long-term spatial priorities. Moreover, the absence of a stable policy framework is eroding public trust and confidence in the planning process itself.

2.17. *The Duty to Cooperate Topic Paper summarises the engagement the Council has undertaken with external organisations, stakeholders and neighbouring authorities. For this consultation, it focusses on strategic cross boundary matters that relate to delivering our housing needs. These are:*

• Planning and delivering housing needs across South Hampshire
• Planning and delivering significant housing sites at Ludgershall
• The cumulative impacts of residential development on the international nature conservation designations of the New Forest, the Solent, and Salisbury Plain
• The cumulative impacts of additional nutrient input from new development on the Solent, River Avon, and River Itchen
• The approach to considering potential impacts on the River Itchen SAC compensation measures, which includes parts of the River Test and some of its tributaries.

LPC's Response:

Given the expectation for local authorities such as Test Valley Borough Council to prepare and consult on emerging Local Plans amid ongoing national policy uncertainty, local government reorganisation and the impending Planning and Infrastructure Bill, how can major development proposals, such as those in nutrient-sensitive catchments, credibly demonstrate compliance with nutrient neutrality, net zero commitments and protection against environmental degradation? In areas like the Test Valley, where chalk streams, biodiversity corridors and agricultural land are under pressure, what safeguards are in place to ensure that housing growth does not come at the expense of long-term environmental resilience?

2.18. *Since the public consultation on the Regulation 18 Stage 2 document, Natural England notified the Council that parts of the River Test and some of its tributaries are providing compensatory measures for the River Itchen Special Area of Conservation. In line with national policy, the sites providing compensation measures need to be given the same protection as the Special Areas of Conservation. At present, additional guidance is awaited from Natural England on the approach to considering potential impacts of the compensation measures. The Habitat Regulations Assessment supporting the draft Local Plan has been prepared based on best available information at present and will be updated prior to the final draft Local Plan (Regulation 19 stage).*

LPC's Response:

In light of Natural England's notification that parts of the River Test and its tributaries are now providing compensatory measures for the River Itchen Special Area of Conservation and given TVBC's recent vote to formally recognising the '**Rights of Rivers**', how will the Council and statutory bodies ensure that these newly designated compensation sites are afforded meaningful legal protection, not only under the Habitats Regulations but also in line with emerging principles of river personhood and ecological rights? Specifically, how will planning decisions and Local Plan policies reflect the River Test's right to flow, regenerate and remain free from pollution and over-abstraction, especially while awaiting further guidance from Natural England?

2.34. *Partnership and collaborative working with many stakeholders including both public agencies and private sector has informed the draft Local Plan and will continue over its preparation and delivery. Delivery of necessary infrastructure is important to our communities and partnership working is crucial to enable coordinated and forward planning. However, this is a significant challenge when we are now needing to plan for many more homes with the delivery of infrastructure outside of our control.*

LPC's Response:

How can the delivery of such a substantial increase in housing be realistically implemented when the supporting infrastructure; transport, utilities, healthcare, education and environmental mitigation, largely falls outside the Borough Council's direct control? The scale of development proposed demands coordinated, long-term investment, yet there is no clear mechanism or commitment for funding or delivery from central government or infrastructure providers.

To proceed with housing allocations without the requisite infrastructure in place is not only short-sighted, it risks creating unsustainable communities, placing intolerable pressure on existing services and undermining public confidence in the planning system.

Central Government must take a holistic approach, recognising that housing delivery cannot be decoupled from infrastructure, environmental resilience and quality of life.

The current trajectory, pushing forward housing numbers in isolation, is ill-conceived and will lead to unmanageable consequences for local authorities and the communities they serve.

Sustainable Spatial Strategy

3.4. *Sustainable development is meeting the needs of the present without compromising the ability of future generations to meet their own needs and has three overarching objectives. To deliver this, we must balance these objectives; economic, social and environment, which can be challenging.*

LPC's Response:

Unless sufficient infrastructure is brought forward to support new housing targets, the revised housing target is completely unsustainable.

3.6. *Taken as a whole, the spatial strategy and the plan's policies will balance the delivery of the three sustainability objectives and how we positively deliver the presumption in favour of sustainable development for our communities. Reflecting this, we are still continuing to not propose to have a policy in the draft Local Plan that sets out the presumption in favour of sustainable development. This approach continues to be supported by consultation responses. Instead, we have expressed what sustainable development looks like for Test Valley.*

LPC's Response:

We support the decision not to include a standalone policy on the presumption in favour of sustainable development in the draft Local Plan. By embedding the principles of sustainability throughout the spatial strategy and individual policies, the Plan offers a more locally nuanced and meaningful interpretation of sustainable development.

This approach reflects the unique character and needs of Test Valley and ensures that development decisions are guided by a clear, area-based vision rather than generic national wording.

3.12. *The market towns of Andover and Romsey are our largest settlements in the borough, with the widest range and number of facilities. They are at the core of our spatial strategy and will continue to be a focus for development. Central to this, is the regeneration of the town centres through requiring high quality design and providing a mixture of uses to support day and evening economies which will benefit our communities and attract visitors. The respective Masterplans are delivering this. Development will need to maximise the use of brownfield land in the town centres.*

LPC's Response:

We fully support the strategic focus on maximising the use of brownfield land within the town centres of Andover and Romsey. Prioritising brownfield redevelopment is a sustainable and a responsible approach that aligns with national planning policy and helps protect the borough's valued greenfield and rural landscapes.

It enables the revitalisation of underused urban spaces, supports regeneration objectives and contributes to the creation of vibrant, mixed-use environments that serve both residents and visitors.

The integration of high-quality design and a diverse range of uses within these areas will not only enhance the character and functionality of Andover town centre but also stimulate the day and evening economies, improve accessibility and reinforce community identity.

The delivery of the respective Masterplans is a positive step forward and we welcome continued investment and innovation in unlocking the full potential of brownfield sites as part of Test Valley's long-term growth strategy.

Proposed Spatial Strategy

3.14. *There are a handful of settlements that also provide a range of facilities and services, and whilst not to the same level of Andover and Romsey, they provide more of a range than our more rural settlements. These are settlements in Tier 2 of the Settlement Hierarchy. These settlements will also continue to be a key focus for growth.*

LPC's Response:

We do not support the continued focus for growth in Tier 2 settlements such as Stockbridge.

Whilst Stockbridge offers a modest range of facilities and plays an important role in serving its surrounding rural communities, it lacks the infrastructure and scale necessary to accommodate significant development without compromising its unique character and heritage.

Stockbridge's charm lies in its historic high street, sensitive landscape setting and close-knit community. Increasing development pressure, risks overwhelming local services, altering the town's identity and impacting the surrounding countryside.

We believe growth should be concentrated in Andover and Romsey, where there is greater capacity, stronger transport links and an established programme of regeneration that can sustainably support expansion.

Instead of directing growth toward Stockbridge, we advocate for a strategy that protects its distinctiveness and prioritises enhancement over expansion.

3.19. *Communities already have the opportunity to shape their areas through Neighbourhood Plans and Village Design Statements. This strategy will support communities in identifying and shaping their needs for housing and other development by using the community planning tools available to them to deliver this, alongside what is proposed in the draft Local Plan. The Council has recently published an updated Community Planning Toolkit (May 2025) providing practical guidance to help and support communities in doing this.*

LPC's Response:

Longstock is in the process of developing a Neighbourhood Plan and has an identified housing need of 12 dwellings; 5 of these dwellings are currently being brought forward in Church Road, Longstock.

3.20. *There is a strong and diverse rural and visitor economy in the borough and the spatial strategy continues to recognise the need to support this. These types of*

economies play a crucial role in supporting and sustaining vibrant communities, and the support for a wider distribution of development will enable this to grow, where it is sustainable to do so.

LPC's Response:

While we recognise the importance of supporting the rural and visitor economy across the borough, we believe that Stockbridge's unique economic and environmental context warrants a more cautious approach to development.

Stockbridge's economy is heavily reliant on tourism, particularly fishing, which draws visitors to the River Test and surrounding natural assets. This industry is intrinsically linked to the health of the local ecosystem and any disruption caused by increased development could have serious consequences for both biodiversity and the viability of this key economic sector.

Stockbridge is also subject to significant physical and environmental constraints. The settlement lies within a Level 1 flood plain, is surrounded by four designated Sites of Special Scientific Interest (SSSIs) and contains a rich historic environment that must be preserved. These factors severely limit the town's capacity to accommodate additional infrastructure or housing, without risking irreversible harm to its character, heritage, and ecological integrity.

We therefore urge that any spatial strategy prioritises environmental protection and economic sustainability over expansion in locations like Stockbridge.

Development here must be carefully considered and strictly limited to ensure that the town's natural and historic assets and the tourism economy they support, are safeguarded for future generations.

3.21. *The delivery of new or improved infrastructure has consistently been raised by our communities as a key concern for them. The significant increase in our need for homes, will put extra pressure on our infrastructure. It is critical to ensure that growth is delivered sustainably with the necessary infrastructure to avoid placing more pressure on existing services or facilities, but this is very challenging to achieve. The Council works collaboratively with partners to plan and deliver infrastructure, however the delivery of such is out of our control.*

LPC's Response:

The delivery of new or improved infrastructure has consistently been identified by our communities as a critical concern.

With the significant increase in housing need, existing infrastructure such as transport, healthcare, education, water and drainage systems, faces mounting pressure.

Without infrastructure-led development, growth risks becoming unsustainable, leading to overcrowded schools, longer GP waiting times, increased traffic congestion and overstretched utilities.

Whilst TVBC works collaboratively with partners to plan and support infrastructure delivery, the actual implementation clearly lies beyond its direct control.

The disconnect between housing growth and infrastructure provision creates a dangerous imbalance, where development outpaces the capacity of essential services, undermining quality of life and eroding public confidence in the planning system.

Test Valley Sustainable Spatial Strategy

Maintaining and enhancing a sustainable and attractive borough through:

• Reducing our impact on our changing climate and integrating ecological networks and improving biodiversity.

• Providing inclusive growth that creates green, safe, and well designed places

• Supporting new or improved infrastructure which positively responds to its setting, local needs, and our changing climate

• Promoting access to the countryside and conserving and enhancing the borough's diverse and historic landscape character

• Providing developments that promote active travel and invest in infrastructure to enable clean travel that reduces our impact from travel

• Working with our communities and organisations to deliver this

Delivering vibrant and resilient towns at Andover, Romsey and other larger settlements through:

• Promoting the town centres as destinations through delivering well designed, accessible, mixed-use developments with improvements to our public realm, maximising the use of previously developed land, to support the day and evening economies in accordance with our Masterplans

• Being a key focus for sustainable growth along with supporting infrastructure which is integrated with the towns

• Sustaining sustainable communities through maintaining and enhancing the roles of our larger settlements

• Working jointly with Andover Vision and Romsey Future to deliver improvements to the town centres

Enhancing and sustaining vibrant and healthy rural communities through:

• Expanding Weyhill to enable the delivery of a primary school

• Maintaining the roles of our rural settlements through supporting appropriate growth to help sustain existing accessible facilities

• Supporting our communities to be empowered to identify and deliver their needs through the use of community planning tools

• Supporting our strong and diverse economy including the rural and visitor economy.

LPC's Response:

The Regulation 18 Local Plan sets out a vision for sustainable development, balancing economic, social and environmental objectives. However, Longstock, Houghton and Stockbridge residents have serious concerns about the feasibility of this vision without robust infrastructure delivery. For instance, the assertion that revised housing targets are sustainable without being matched by sufficient infrastructure directly challenges the Plan's foundational principle of 'meeting present needs without compromising future generations'.

The lack of a policy on the 'presumption of sustainable development' is supported precisely because it allows focus on areas with existing transport and facility networks, highlighting the importance of infrastructure in determining suitable growth locations.

Comments regarding constrained settlements like Stockbridge and Longstock further illustrate the dangers of applying blanket growth strategies without accounting for local limitations such as flood risk, conservation status and ecological sensitivity.

The emphasis on regenerating town centres and maximising brownfield land is welcomed, but only if existing infrastructure can support the proposed intensification.

Ultimately, these comments underscore a recurring theme: without infrastructure-led development, the Local Plan risks undermining its own goals, placing undue pressure on services, eroding community trust and compromising the long-term sustainability of Test Valley.

Settlement Hierarchy and Boundaries

3.23. *The Regulation 18 Stage 2 document identified a draft settlement hierarchy (in Spatial Strategy Policy 1 (SS1)). This set out where settlements sat in the hierarchy based on their range of services and facilities. It identifies four settlement tiers. The more sustainable settlements are located in the higher tiers of the hierarchy as residents are able to access a greater range of services and facilities more easily without the need to travel as far by car. The smaller, less sustainable settlements with fewer facilities are located towards the bottom of the hierarchy.*

LPC's Response:

This statement, while superficially logical, fails to take into account real-world constraints that affect both access and development potential in rural areas. It assumes that proximity to services equates to sustainability, without considering:

• **Infrastructure limitations** such as narrow rural roads, lack of public transport and limited parking.

• **Environmental constraints**, including flood risk zones, biodiversity protections and landscape designations.

• **Community capacity and character**, which are often incompatible with large-scale development.

• **Planning policy restrictions**, such as those outlined in Policy COM2 of the adopted Local Plan, which limits development within defined settlement boundaries.

In the case of the **Tier 4 Settlement of Longstock**, the suggestion that parts of Roman Road and Houghton Road fall within Stockbridge's Tier 2 designation is not only **factually inaccurate**, it is **misleading**.

Longstock and Stockbridge do not share the infrastructure, service provision or development capacity of larger towns like Andover and Romsey and their inclusion appears to be a convenient reclassification rather than a reflection of actual sustainability.

We urge TVBC to revisit its methodology and ensure that constraints and local context are properly factored into the settlement hierarchy. **A hierarchy based solely on theoretical access to services risks undermining the integrity of rural communities and promoting unsustainable development**.

3.24. *The Regulation 18 Stage 2 document also identified settlement boundaries. Settlement boundaries are a planning tool to direct development to the most sustainable locations, within defined settlement boundaries. Areas outside the defined boundaries are classed as countryside for the purpose of planning policy.*

LPC's Response:

Fully Supported

3.25. *We are not proposing any changes to the settlement hierarchy or settlement boundaries that were consulted on as part of the Regulation 18 Stage 2 document. These will be reviewed following consultation on this document and set out in the final draft Local Plan (Regulation 19 stage). For ease, a copy of the draft settlement hierarchy is provided at Appendix 1 and the settlement boundaries are set out on the draft Policies Map. We will take into account comments made on these, at both the Regulation 18 Stage 2 and on this document, in producing the final draft Local Plan.*

LPC's Response:

And yet, at the public exhibition held at Stockbridge Town Hall, Karen Eastley informed Longstock Parish Councillors and attendees, that Roman Road and Houghton Road (**in the Tier 4 Settlement of Longstock**) now form part of Stockbridge's settlement boundary for planning purposes, effectively placing them within a **Tier 2 designation**.

Longstock Parish Council **strongly objects to this assertion**. We have not been formally consulted on any proposed boundary changes affecting our parish, nor have we received any documentation that justifies this reclassification. This lack of transparency is deeply concerning and appears to contradict the Council's own statement **that no changes are being proposed**.

We consider it **wholly inappropriate** for Test Valley Borough Council to redefine settlement boundaries **to suit a planning narrative,** particularly when such changes have significant implications for housing allocations, infrastructure expectations and the character of our rural community.

Longstock is a Tier 4 settlement, with limited facilities and a distinct identity which is separate from Stockbridge. Any attempt to absorb parts of Longstock into Stockbridge's Tier 2 designation is **misleading, procedurally flawed and undermines the principles of community-led planning** as set out in the **Localism Act 2011.**

We request formal clarification on this matter and urge the Council to respect the integrity of Longstock's settlement status and consult appropriately on <u>any</u> proposed changes.

Housing Need

3.33. *We previously undertook a Strategic Housing Market Assessment (SHMA) in 2022 to evidence our overall housing need, affordable housing need and specialist housing need. This study will be updated to inform the final draft Local Plan (Regulation 19 stage) on affordable and specialist housing needs.*

LPC's Response:

In November 2024, Zoopla estimated that the average house prices in the parishes of Longstock, Houghton and Stockbridge to be;

<u>Longstock:</u>
Terraced: £342,000 – £387,000
Semi Detached - £330,000 – £472,000
Detached: £931,000 – £2,400,000+

<u>Houghton:</u>
Terraced: £420,000 – £550,000
Semi Detached: £600,000 – £750,000
Detached: £1,400,000 – £2,000,000+

Stockbridge:
Terraced: £428,800
Semi Detached: £456,100
Detached: £909,900 – £1,162,600

These figures highlight the significant cost barriers faced by lower-income households, particularly in rural and high-demand areas. How will Local Plan policies address and ensure developers deliver truly affordable housing on qualifying sites which are tailored meet local income levels?

Unmet Housing Needs

3.37. *At present, we therefore do not have any current requests to help meet unmet housing needs from our neighbouring authorities. This position may change as plan preparation continues but it is uncertain whether this will be at a point at which this draft Local Plan can address this, or whether it will need to be addressed through the new Spatial Development Strategies to be prepared by the combined authorities and subsequent future Local Plans under the new unitary authorities.*

LPC's Response:

In November 2024, the Government proposed a dramatic increase in housing delivery across the region. New Forest District Council (NFDC) saw its annual housing target rise from 729 to 1,465 homes - a staggering 101% increase. Given that 90% of the New Forest lies within a protected National Park, development opportunities are severely constrained.

This raises a critical question: How will TVBC ensure that its Local Plan policies safeguard the borough from absorbing a disproportionate share of neighbouring authorities' unmet housing need?

Housing Market Areas

3.40. *This draft Local Plan proposes to change this, by removing the two HMAs and monitoring housing need and calculating our five year housing land supply on a boroughwide basis. This reflects the revised NPPF which requires local authorities to measure housing needs on a boroughwide basis.*

LPC's Response:

Whilst the draft Local Plan's proposal to remove the two Housing Market Areas (HMAs – Northern and Southern Test Valley) and monitor housing need on a boroughwide basis may align with the revised National Planning Policy Framework (NPPF), this change risks unfairly concentrating housing delivery in one part of the borough - particularly around Andover or Stockbridge.

HMAs were originally designed to reflect distinct housing markets and community identities. Removing them could lead to disproportionate development in areas that are perceived as more “deliverable,” regardless of infrastructure capacity or community impact.

Residents are already voicing concerns about overstretched services; from schools and GP surgeries to transport and utilities. A boroughwide approach risks ignoring these localised constraints in favour of meeting aggregate targets. As a consequence, the borough may become more vulnerable to developer-led schemes that exploit the absence of spatial safeguards, especially in areas where land is more readily available, but less suitable for sustainable growth.

Rural Housing Requirement

3.43. *Due to the increase in our housing need, we have had to review our spatial strategy and how we are seeking to deliver this across the borough. The delivery of the spatial strategy in the rural area, will still be met by committed housing supply and communities bringing forward locally driven schemes, but alongside this, the draft Local Plan is now having to allocate homes in the rural area. This change in approach, means what was previously proposed is no longer appropriate, however we will review this in the preparation of the Regulation 19 document.*

New Designated Neighbourhood Plan Areas and made Neighbourhood Plans under review will be provided with a minimum housing requirement following designation or on commencement of the review, unless a site allocation is made in the designated Neighbourhood Plan Area in the Local Plan.

LPC’s Response:

This statement proposes that due to increased housing need, TVBC will now allocate homes directly in rural areas, even where communities have previously relied on locally driven schemes and Neighbourhood Plans.

It further states that designated Neighbourhood Plan Areas will be given a minimum housing requirement unless the Local Plan itself makes allocations within those areas.

This approach undermines the spirit and intent of the Localism Act 2011, which was designed to:

- Empower local communities to shape development in their area through Neighbourhood Plans
- Decentralize planning decisions, giving residents and parish councils a meaningful role in determining where and how housing is delivered
- Protect community-led planning from being overridden by top-down targets

By pre-emptively allocating sites in designated Neighbourhood Plan Areas, or imposing minimum housing numbers before communities have had the chance to consult and plan, TVBC risks:

- Disenfranchising local residents, who may feel excluded from decisions that directly affect their villages
- Undermining trust in the planning system, especially in rural parishes that have actively engaged in neighbourhood planning
- Contradicting the principle of subsidiarity, where decisions should be made at the most local level possible

To uphold the Localism Act and foster genuine community participation, TVBC should:

- Pause allocations in designated Neighbourhood Plan Areas until communities have had the opportunity to review or prepare their plans
- Offer support and guidance to parish councils to help them meet housing needs through locally appropriate solutions
- Avoid imposing minimum housing numbers without meaningful consultation and evidence of local capacity and infrastructure

Neighbourhood Plan Housing Requirement

3.50. *At our rural settlements (as identified in settlement tiers 3 and 4 of the settlement hierarchy), the draft Local Plan will consider and identify housing requirements for designated neighbourhood plan areas, but only where there is no site allocation proposed in the draft Local Plan. The site allocations are of a scale that would meet the housing needs of these settlements.*

LPC's Response:

The proposal to allocate **SHELAA Sites 237 and 479** for **100 dwellings** in **Longstock and Houghton**, which are both Tier 4 settlements with Neighbourhood Plan designations, raises serious concerns under both the **Localism Act 2011** and national planning guidance.

Tier 4 Settlements Are Meant for Limited Growth, they are typically small villages with limited services, where growth is expected to be modest and locally driven.

Allocating 100 dwellings in such locations will overwhelm infrastructure and alter the rural character, contrary to the **spatial strategy** that prioritizes sustainable development in higher-tier settlements.

Neighbourhood Plans Should Lead Development

- **Longstock** has a designated Neighbourhood Plan area, and **Houghton** has a made Neighbourhood Plan.

- Under the **Localism Act 2011**, these plans are meant to **guide development locally**, including site selection and housing numbers.
- Allocating sites in the Local Plan before or outside the Neighbourhood Plan process undermines community control and contradicts the principle of bottom-up planning.

SHELAA Sites Are Not Automatically Suitable

- The **Strategic Housing and Economic Land Availability Assessment (SHELAA)** is an evidence-gathering tool — it does not allocate sites or guarantee planning permission.
- Inclusion in the SHELAA merely indicates that landowners have promoted the site; it does not confirm suitability, deliverability or community support.

Premature Allocation Undermines Local Decision-Making

- The statement that Neighbourhood Plan areas will be given a **minimum housing requirement unless the Local Plan allocates sites** effectively removes the community's right to choose how and where growth happens.
- This contradicts the **National Planning Policy Framework (NPPF)**, which supports neighbourhood planning as a mechanism for shaping development in line with local priorities.

What Should Be Done Instead

- **Respect the Neighbourhood Plan process**: Allow Longstock and Houghton (**both Tier 4 Settlements**) to determine appropriate sites and housing numbers through community consultation.
- **Avoid top-down allocations** within Tier 4 settlements, unless there is clear evidence of local support and infrastructure capacity.
- **Use the SHELAA as a starting point**, not a justification for overriding local Neighbourhood Plans.

3.54. *The assessment for the designated neighbourhood plan areas concluded that a minimum requirement of 10 new homes over the plan period should be provided for. This figure will ensure that affordable housing can be provided in these rural areas. This minimum figure should be delivered through the Neighbourhood Plan and supplemented with local evidence, such as a housing needs survey, to ensure that the right type and size of new homes are delivered in the designated areas. There are a few active designated areas where no housing requirement is proposed reflecting the constraints that exist at these areas.*

LPC's Response:

To support the development of a robust, evidence-based housing policy within its Neighbourhood Plan, Longstock Parish Council commissioned a Housing Needs Assessment in partnership with TVBC.

The completed assessment identified a clear and demonstrable need for **12 affordable homes**, specifically tailored to meet the housing requirements of local residents – 2 bed properties and 1 bed bungalows for older people.

This evidence provided a strong foundation to shape future development in a way that reflects genuine community need and supports sustainable rural living.

The subsequent allocation of 100 dwellings across **SHELAA Sites 237 and 479** in **Tier 4 Settlements** within the parishes of Longstock and Houghton, fundamentally undermines the Neighbourhood Planning process and the principles of localism enshrined in the **National Planning Policy Framework (NPPF)**. This allocation disregards the findings of the locally commissioned Housing Needs Assessment, which clearly identified a need for only 12 smaller affordable homes to meet genuine local demand.

Such a top-down approach not only conflicts with Paragraphs 29–30 of the NPPF, which emphasise the role of Neighbourhood Plans in shaping development that reflects community aspirations, but also fails to respect the outcomes of extensive local consultation.

The proposed scale of development risks overwhelming existing infrastructure, altering the rural character of the area and eroding public trust in the planning system. It is essential that strategic housing allocations align with locally evidenced needs and uphold the democratic intent of Neighbourhood Planning.

Meeting Our Housing Requirement

Table (Page 28) Land at Danebury School, Stockbridge 100

Parish - Longstock / Houghton Tier 2 Settlements - NA15

LPC's Response:

Longstock and Houghton are **both Tier 4 Settlements** - this statement is **misleading** and needs to be rectified immediately.

3.62. *The Regulation 18 Stage 2 document proposed sites at our largest and most sustainable settlements of Andover, Romsey, Ludgershall13, Valley Park, Chandler's Ford and Nursling and Rownhams. Further sites are allocated at Andover, Romsey, Ludgershall, Stockbridge, and Nursling and Rownhams.*

LPC's Response:

While the Regulation 18 Stage 2 document identifies proposed sites in the borough's largest and most sustainable settlements including Andover, Romsey, Ludgershall, Valley Park, Chandler's Ford, and Nursling and Rownhams, the inclusion of

SHELAA Sites 237 and 479 in the list of further site allocations under the banner of Stockbridge**, is factually incorrect and deeply misleading**.

These sites are not located within Stockbridge parish but fall squarely within the boundaries of **Longstock and Houghton** - both of which are **designated Tier 4 Settlements** under the spatial hierarchy.

This mischaracterisation undermines the integrity of the plan's sustainability-led strategy, which explicitly prioritises development in higher-tier settlements with existing infrastructure and service capacity.

Longstock and Houghton lack the scale, connectivity and resilience required to accommodate strategic growth. Their classification as Tier 4 Settlements reflects their limited suitability for development and any attempt to rebrand peripheral sites as part of Stockbridge to justify allocation is **not only inconsistent with the evidence base but also risks eroding public trust in the plan-making process**.

To uphold the principles of sound spatial planning and ensure policy coherence, **Sites 237 and 479 must be correctly attributed to their respective parishes and excluded from further consideration as strategic allocations.**

Meeting our Economic Needs

3.71. *National policy emphasises the role of the planning system in helping to create an environment in which businesses can invest, expand and adapt. A key part of delivering sustainable development is building a responsive and competitive economy, including by ensuring the appropriate availability of land to support economic growth, innovation and improved productivity.*

LPC's Response:

National planning policy emphasises the importance of creating an environment where businesses can invest, expand and adapt, with a focus on supporting economic growth, innovation and productivity. However, the proposed allocation of **100 dwellings across SHELAA Sites 237 and 479**, situated within the rural **Tier 4 Settlements** of **Longstock and Houghton (but negatively impacting Stockbridge),** poses a serious threat to two of the region's most vital economic sectors: tourism and agriculture.

Stockbridge and its surrounding villages are renowned for their heritage charm, scenic Test Valley landscapes and vibrant visitor economy. The area attracts thousands of tourists annually who come for:

- **Fly fishing on the River Test**, a globally recognised chalk stream
- **Walking and cycling** through protected countryside and conservation areas
- **Independent shops, galleries and eateries** that thrive on rural character

Introducing large-scale housing developments risks:

- **Visual and environmental degradation**, undermining the area's appeal
- **Increased traffic and urbanisation**, disrupting the tranquil visitor experience
- **Loss of heritage value**, which is central to Stockbridge's tourism identity
- **Loss of employment,** for those employed in tourism related industries

Tourism in the Test Valley is not just about leisure; it's a **critical economic driver** which supports local jobs and small businesses who rely on the preservation of the rural setting.

In addition, the proposed sites lie within active agricultural zones which are essential to the local food economy and rural employment. Development here would:

- **Displace productive farmland**, reducing agricultural output and impacting on food security
- **Increase pressure on shared rural infrastructure**, such as access roads and water supply

Allocating **SHELAA Sites 237 and 479** for housing in the **Tier 4 Settlements** of **Longstock and Houghton** is incompatible with national policy goals for sustainable economic development. It risks irreversible harm to the tourism appeal of Stockbridge and farming viability of the surrounding area.

A genuinely responsive planning system must safeguard the region's economic diversity and preserve the rural character that underpins its distinctiveness and long-term prosperity.

3.74. *A key consideration in determining the level of employment land needed, is whether there is a balance between the amount of new employment land provided versus the number of new homes to be delivered. New homes generate new population and increase the amount of people available to work. An appropriate balance between homes and employment ensures that there are opportunities for the Test Valley population to live and work in the same area.*

LPC's Response:

Evidence from similar rural developments in Test Valley suggests that sites like **237 and 479** are likely to bring forward **large, expensive executive-style homes**, rather than a mix of housing types that meet the needs of local workers, young families, and key service providers. This trend leads to:

- **Limited affordability**, excluding many who work locally
- **Attraction of external buyers**, often relocating from urban centres
- **Reduced housing options for agricultural, hospitality and retail workers**

Such housing does little to support the economic resilience of **Tier 4 settlements such as Longstock and Houghton** or Stockbridge and its neighbouring parishes, where small businesses and farms rely on a stable, local workforce.

Rather than fostering a live-work balance, these developments risk turning Stockbridge, Longstock, and Houghton into **commuter dormitories**, with residents travelling to urban centres like Winchester, Southampton, Basingstoke or London for employment. This shift brings:

- **Increased traffic congestion and carbon emissions**
- **Strain on rural infrastructure and transport links**
- **Reduced daytime economic activity**, weakening local businesses

The result is a disconnect between housing growth and local employment opportunity, contrary to the aims of sustainable development.

SHELAA Sites 237 and 479 do not represent a balanced or sustainable approach to housing provision. By prioritising high-end residential development without corresponding employment land or truly affordable housing, risks deepening commuting patterns and undermining the economic vitality of the Test Valley's rural communities.

Chapter 4

Land at Danebury School, Stockbridge Northern Area Policy 15 (NA15):

Land at Danebury School, Stockbridge

A strategic housing allocation of approximately 100 dwellings is proposed at Land adjacent to Danebury School, Stockbridge.

Development will be permitted subject to:

a) Access to the development via the north of the site from the A30;

b) The appropriate reprovision of sports pitches;

c) Submission of a Heritage Impact Assessment to demonstrate how the layout and design of the development will respond sensitively to the significance of heritage assets in the vicinity, including the setting of Stockbridge Conservation Area; and

d) An appropriate layout reflecting the setting of the public right of way to the north of the site.

***4.92**. The site comprises open fields and existing sports pitches, access and parking areas adjacent to Danebury School, on the western edge of Stockbridge, in Longstock and Houghton parishes. The site lies in the river valley to the west of Stockbridge, on land that rises to the west.*

4.93. *The site will deliver a development of approximately 100 homes within close proximity to a range of facilities and services in the centre of Stockbridge, together with replacement school sports pitches.*

4.94. *The school sports pitches are currently located within the north east corner of the site, and will need to be relocated to the south west corner. The typography of the site will need to be taken into account to ensure the pitches are usable. Ongoing discussions with Hampshire County Council and the School Trust are required to enable this to take place.*

4.95. *Site access will be provided via the A30 to the north, with technical work required by the site promoter to inform access to each part of the site. There is an opportunity to enhance active travel connections to improve access to facilities and services in the High Street and provide access to the countryside.*

4.96. *The site straddles the conservation area to the north east and there are several listed buildings adjoining the site. There are heritage assets in the town and wider landscape, including at Stockbridge Down (scheduled monuments) and Marsh Court to the east (Grade I listed building and Registered Park and Garden). A Heritage Impact Assessment will be required, to inform the layout and design of the site.*

4.97. *The land within the allocation rises up to the west of the valley floor and continues to rise beyond the site. Careful consideration must be given to views into and over the development. Structural landscaping will help to soften views and integrate the development within this setting. The outcome of landscape and visual assessments will inform layout, design and landscape strategy.*

4.98*. The site falls within the 7.5km zone of influence for Mottisfont Bats Special Area of Conservation (SAC) and appropriate mitigation will be needed.*

4.99. *The River Test and its adjacent floodplain and tributaries is a SSSI. This stretch of the River Test is also providing compensation measures for the River Itchen SAC. It is important that any potential impact on this watercourse and its sensitive ecology is carefully considered.*

4.100. *The public right of way, to the north of the site, follows the route of a Roman Road, which historically linked Winchester and Old Sarum. The development will have regard to the setting of this historic right of way.*

LPC Response:

The proposed allocation of 100 dwellings at land adjacent to Danebury School under Policy NA15 is fundamentally flawed and should be removed from the Regulation 18 Local Plan.

The site is misrepresented as being in Stockbridge, when it lies within the Tier 4 Settlements of Longstock and Houghton, which are deemed as unsuitable for strategic development.

It is heavily constrained by environmental protections, including proximity to the River Test, multiple SSSIs and a Level 1 floodplain; triggering legal obligations under the Habitats Regulations.

The development would threaten water quality, biodiversity and the local tourism economy, while lacking the infrastructure necessary to support growth.

It also poses risks to heritage assets and the rural landscape. The allocation is unsound, undeliverable and inconsistent with national planning policy.

Appendix 1 – Settlement Hierarchy – Scale of Development (PDF Page 113)

- Strategic allocations
- Windfalls
- Replacement dwellings
- Community-led Development
- Rural Affordable Housing sites
- Strategic Employment Sites - Small scale employment development
-Renewable Energy Development

LPC's Response:

Inclusion of Stockbridge as a Tier 2 Settlement

The designation of Stockbridge as a Tier 2 settlement within the draft Local Plan is fundamentally flawed and inconsistent with the principles outlined in the National Planning Policy Framework (NPPF).

Paragraphs 7–14 of the NPPF emphasize the importance of genuinely plan-led sustainable development, which must reflect the roles and character of different areas and promote development in locations with accessible services and transport options. Stockbridge however, is severely constrained by flood risk zones, environmental designations and a lack of public transport - factors which directly undermine its sustainability.

Contrary to the Tier 2 criteria, Stockbridge does not possess "all key facilities," and its limited infrastructure and reliance on private vehicles conflict with the NPPF's goals of reducing carbon emissions and supporting inclusive access to services.

The town's rural character and heritage assets demand careful protection, as required under Chapter 16 of the NPPF, which stresses the need to conserve and enhance the historic environment.

In light of these national policy directives, Stockbridge's classification as Tier 2 is incorrect and will lead to unsustainable and inappropriate development.