

## Planning Policy

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**From:** MJLWigley <  
**Sent:** 15 August 2018 12:40  
**To:** Planning Policy  
**Subject:** Re: A451-A500 Issues and Options consultation for the next Local Plan

### Comments on the TVBC Local Plan Issues and Options document

**The new TVBC Local Plan should make a clear distinction between sustainable and unsustainable development and prioritise sustainable development.**

The current Local Plan policy on sustainable development (SD1) is inadequate and does not satisfactorily address the issue. It provides no definition of what the council considers 'sustainable development' and no mechanism for prioritising it (applying the 'presumption in favour').

The Oxford English Dictionary definition of 'sustainable development' is: "*Economic development that is conducted without depletion of natural resources*". Another definition used by TVBC itself is "*Sustainable means ensuring that better lives for ourselves don't mean worse lives for future generations*".

The new 2018 NPPF ([https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/728643/Revised\\_NPPF\\_2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf)) now contains the UN General Assembly definition of Sustainable Development '*meeting the needs of the present without compromising the ability of future generations to meet their own needs*'. Paragraph 11 spells out the presumption in favour for sustainable development.

All these could now be used to provide guidelines to what TVBC believes is 'sustainable'. The vast majority of current development within TVBC, for example Abbotswood and Ganger Farm, would not meet any definition of 'sustainable' development.

The NPPF paragraph 149 states that "*Local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations...*" with a footnote on 'climate change' that says "*In line with the objectives and provisions of the Climate Change Act 2008.*" The Climate Change Act 2008 headline goal is "*The target for 2050 It is the duty of the Secretary of State to ensure that the net UK carbon account for the year 2050 is at least 80% lower than the 1990 baseline*".

These NPPF paragraphs along with the definitions of sustainable development provided must mean, in the context of house building, that TVBC should not only aim for developments that are as close to zero touch on the environment as possible (i.e. 'without depletion' and without making future generations' lives 'worse') but also to have a positive contribution to the required Climate Change Act reduction in net carbon. Development should provide a net contribution towards the necessary reduction.

This must place an obligation on TVBC to not just work to slightly improve planning related economic activity (to make it 'less bad' - i.e. to produce increasing amounts of carbon and depletion but less than has happened previously) but to actively work to reduce the impact of the overall building activity (to make it 'good' – i.e. to reduce overall carbon production and resource consumption). The former may slow down the depletion of the natural resources but the latter is

what is required to actually stop the depletion and improve the situation - which is what must happen to meet the Climate Change requirement to reduce net carbon by 80%.

According to the UK Green Building Council, in the UK, approximately 45% of all carbon emissions come from the use and operation of existing buildings. Therefore building development must be addressed to meet the carbon targets.

The Local Plan Issues and Options discussion document (<http://www.testvalley.gov.uk/assets/attach/7403/Local%20Plan%20Issues%20and%20Options%20FINAL.pdf>) states:

*Section 7.15 'The Romsey Future vision document includes an ambition to take a lead in lobbying the government to change legislation and encourage the delivery of low energy homes.'*

This section is not necessary, there is no reason not to act now. The new NPPF provides the legislation that would allow TVBC to 'take a lead' in this.

The above all means that TVBC should now include policies within the new Local Plan that promote real 'sustainable development' (i.e. development that meets the dictionary definition). To meet this obligation TVBC should allocate areas (within the settlement boundary) that are only available for sustainable development that will contribute to the 2050 Carbon Act target (i.e. supported by evidence that they are zero carbon or carbon negative).

Michael Wigley

On 06/07/2018 11:55, Planning Policy wrote:

The Council is preparing our next Local Plan for the Borough for the period to 2036.

A Local Plan has to be based upon national planning guidance (National Planning Policy Framework and Planning Practice Guidance), the evidence that we have collected and have taken into account, and what the Council and our communities see as the key planning issues.

The Council is therefore consulting on the issues and options for the next Local Plan, as the first stage in the preparation process, aims to get your views on the issues that face the Borough, and those that live and work in Test Valley will face, and the options for how best to deal with them. This includes how much development we should plan for and where it should go. It is not about identifying possible sites for development at this stage. The consultation includes issues covering: housing, employment, the environment and infrastructure. The potential options we've identified may not through be the only ones, and you can suggest other alternatives, if you think there are more.

The Issues and Options document was been approved by the Council for a ten week public consultation period running from 6<sup>th</sup> July to 14<sup>th</sup> September 2018. The document is available on our website [www.testvalley.gov.uk](http://www.testvalley.gov.uk).

Comments on the Issues and Options document should either be:

- Sent in writing to Planning Policy, Test Valley Borough Council, Beech Hurst, Weyhill Road, ANDOVER, Hampshire, SP10 3AJ; or
- Emailed to [planning.policy@testvalley.gov.uk](mailto:planning.policy@testvalley.gov.uk)

Please provide your name and either a postal or email address. If you are responding on behalf of someone else, please also provide the name of the individual/organisation. Please note that emails are subject to a maximum 30Mb size limit, above which they will not be received.

Only those representations that are made in writing and arrive (in either hard copy or electronically) within the ten week period ending at **4.30pm on Friday 14 September 2018** will have the right to have their representations considered. If you respond to this consultation, we will keep you