

## Planning Policy

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**From:** Steve Gilbert  
**Sent:** 23 August 2018 16:09  
**To:** Planning Policy  
**Subject:** Issues and Options Consultation  
**Attachments:** 180822 Response to Issues and Options Consultation.docx

Please see attached comments from the RSPB on the Test Valley Local Plan Issues and Options consultation.

**Steve Gilbert**

Senior Conservation Officer

**The RSPB, South East England Regional Office**

**Tel**

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## Let's give nature a home



The RSPB is the country's largest nature conservation charity, inspiring everyone to give nature a home. Together with our partners, we protect threatened birds and wildlife so our towns, coast and countryside will teem with life once again. We play a leading role in BirdLife International, a worldwide partnership of nature conservation organisations.

The Royal Society for the Protection of Birds (RSPB) is a registered charity: England and Wales no. 207076, Scotland no. SC037654

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BY EMAIL ONLY -

## **OUR FUTURE – HOW DO WE PLAN FOR IT?**

### **ISSUES AND OPTIONS CONSULTATION JULY 2018**

This is the RSPB's response to Test Valley Borough Council's (TVBC) July 2018 consultation paper. We are grateful for the opportunity to comment upon and help shape TVBC's approach to its revised Local Plan.

Our principal areas of interest concern biodiversity and mitigation for any impacts on the environment that development in TVBC may have.

We welcome TVBC's commitment to mitigation for any adverse impacts of residential development caused by increased recreational disturbance on the New Forest Special Protection Area (SPA) and the Solent and Southampton Water SPA. We look forward to seeing the next consultation draft of the plan when we expect to see and be able to comment on TVBC's evidence base (including the emerging Habitats Regulations Assessment) and specific proposals in relation to the agreed strategic mitigation for these SPAs including, as necessary -

- area standards for SANGs and the housing development to which they should apply
- any other mitigation that is expected, and
- funding of the mitigation.

In relation to Question 42 in the consultation, the RSPB recognises that different sized SANGs perform different and complimentary functions as attractors for visits and for day-to-day uses. We look forward to seeing TVBC's decision and reasons on the balance of SANGs that the Plan seeks.

We also have related comments on two further questions.

On Question 8, we believe that the least impact from recreational disturbance on the SPAs will arise if the greatest possible proportion of new housing development allocations in the Borough are located as far away from them as its strategy permits.

On Question 9, our view is that the standard way of defining settlement boundaries – that is, tight to existing buildings and curtilages – should be used because of the potential for a loss of effective control of the size and extent of settlements, putting pressure on the SPAs that could not have been foreseen when the mitigation strategies were developed.

If you have any queries on our comments please do not hesitate to contact me.

Yours sincerely