

Planning Policy Team
Test Valley Borough Council
Beech Hurst
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By email only:

www.hiwwt.org.uk

7th September 2018

Your Ref:
Our Ref: 14.7.8.1

Dear Planning Policy Team

PROPOSAL: ISSUES AND OPTIONS CONSULTATION FOR THE NEXT LOCAL PLAN

LOCATION: TEST VALLEY BOROUGH

Thank you for contacting the Wildlife Trust on this Local Plan Issues and Options consultation, we welcome the opportunity to comment. In commenting we have in general restricted our comments to those questions or paragraphs that have the potential to improve or adversely impact the wildlife of the borough.

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Paragraph 2.7**

We are pleased to see that work has been started on updating the evidence base, and hope that this includes identifying the most wildlife-rich areas in the borough and where coherent wildlife corridors are located and understanding how they function. We are aware that the Borough Council has been supporting the Local Nature Partnership's (LNP) Ecological Network Mapping and hope that this information will be used to inform this emerging Local Plan, and where there are gaps, additional surveys will be undertaken. Such information will be crucial if the Borough Council is to aim to deliver net gains in biodiversity through the planning system.

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Q2: What could be improved about living and/or working in Test Valley?

In our considered opinion the most important improvement would be to ensure that the natural environment is protected and enhanced and that coherent ecological networks are maintained, or where they are missing, created. This will not only help stop the decline in biodiversity, but it would help deliver health and wellbeing objectives for residents of the borough, as well as enhanced natural capital with direct economic benefits.

Q3: What should the Local Plan aspirations be for the next 20 years?

This emerging Local Plan should look to deliver development that is truly sustainable, protect the environment, deliver net gains in biodiversity and maintain or create coherent ecological networks. The Borough Council's commitment in supporting the LNP's Ecological Network Mapping is a welcome first step, but this must be followed up with a change in approach to planning where the network is protected from development and its impacts.

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Paragraph 5.3

Paragraph 5.3 states *"If we don't plan to meet the housing needs arising from these factors, there is a risk that residents' needs won't be met, resulting in a situation where demand continues to outweigh supply. This will push up house prices making it more difficult for people to enter the housing market. By not planning for this growth there is also a greater risk that housing developments could be built in inappropriate locations."*

This is acknowledged, but even though the Borough Council have been delivering sufficient housing and in the right places in some instances, Planning Inspectors have been overruling decisions and granting permissions. To continue to deliver housing without taking proper account of the environment will not ensure that net gains in biodiversity are delivered and will lead to further fragmentation of ecological networks and damage to sensitive nature conservation sites. It is therefore crucial that all necessary evidence is gathered to ensure that housing is delivered in the right places and in a truly strategic and sustainable manner.

Paragraph 5.4

"In identifying a local target, national planning policy requires Local Plans to meet their 'objectively assessed needs' for housing development. An 'objectively assessed need' is a technical calculation of how many houses are needed in an area over a period of time. In the current local plan, the Council set out a figure of 588 homes per year between 2016 and 2029. This would deliver affordable housing, create jobs and ensure we have enough homes for our changing population."

Whilst the National Planning Policy Framework (NPPF) requires the planning system to contribute to the achievement of sustainable development, and that the three overarching objectives (economic, social and environmental) must be pursued in mutually supportive ways, the significant declines in biodiversity are evidence that this is not happening. As far as we can see the 'objectively assessed housing need' calculation is flawed since it does not take account of the environment or whether a Local Authority has the space to deliver more housing without impacting on the natural environment. It is obvious that in a borough with finite natural resources, development cannot continue without losses in biodiversity occurring. This needs to be understood and recognised if the current trend of biodiversity loss is to be reversed.

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

In our considered opinion the housing requirement should be governed by the amount of space available for development, without having an adverse effect on the environment. If it is considered that sufficient housing cannot be delivered then the Local Plan's housing requirement should be reduced and this should be fully evidenced in order to demonstrate to the Government that additional housing would simply not be sustainable.

Some Local Authorities are already struggling to deliver the required number of dwellings, particularly where they are highly constrained by the presence of important nature conservation sites, such as the New Forest Ramsar, SPA, SAC and the Solent and Southampton Water SPA, SAC. Whilst there are strategic schemes in place to mitigate the impacts of recreational disturbance on interest features, and we acknowledge the Council's lead in commissioning a study for the New Forest, there are some features already showing significant declines, thereby indicating that mitigation measures are not currently working.

Q5: Should the Local Plan increase its housing requirement to help support economic growth? If yes, do you have any evidence to support this?

As Q4 above, it is important that any decisions made about housing numbers are evidenced based, including the use of ecological network mapping.

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Paragraph 5.11

"As we are at an early stage of plan preparation further work needs to be done before we can consider potential sites to allocate for housing, or any other use. However, as part of the initial

evidence gathering the Council undertook a 'call for sites' in 2017 which fed into the publication of our Strategic Housing and Economic Land Availability Assessment (SHELAA). This document lists all those sites which have been promoted to the Council. We will need to consider these in more detail when an approach for distributing housing across the Borough has been identified. The SHELAA can also help those parishes who have started a community planning initiative, such as neighbourhood planning or community right to build."

We are concerned that the current process for identifying sites for development includes the promoting of land by prospective developers who have options on such land. This approach does not take account of the ecological value of land, nor its function within existing ecological networks or opportunity areas. We consider that the SHELAA should be evidenced based, using the most up-to-date information, including the LNP ecological network mapping, if it is to be truly sustainable. If the existing approach is continually used it is likely to further lead to the fragmentation of habitats and severance of ecological networks and will be unable to deliver net gains in biodiversity. We consider that the SHELAA should adopt a new approach whereby only sites which lie outside of the identified network are promoted, and those within it are protected.

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

The distribution of development in the borough should be informed by the LNP's ecological network mapping and ensure that biologically rich areas are linked up thereby maintaining the function of ecological networks. By linking up such areas, as well as being important for wildlife, they can also function as part of the network of green infrastructure for people and wildlife, where feasible and without detriment to the ecological function.

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

As we have stated throughout we consider that settlement boundaries should in part be informed by the LNP ecological network mapping.

Paragraph 5.46

"The Council has the option of applying standards for new housing which go beyond Building Regulations requirements.....We can also seek enhanced water efficiency standards. We are able to do this because of the importance of groundwater within the Borough to feed the various local rivers and streams."

With the future uncertainties surrounding our water supply as a result of predicted climate change and population growth, we consider that the Borough Council should adopt a precautionary principle and seek to enforce enhanced water efficiency standards. As a society we need to be less wasteful with our natural resources and such practices, combined with efficient water harvesting measures would go some way in ensuring that water resources are conserved.

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Q33: Should we continue to retain the principle of Local Gaps? Should we define specific boundaries or a more general policy which aims to avoid coalescence?

Local Gaps play an important role, not only in preventing the coalescence of smaller communities, but also in providing and enhancing functioning ecological corridors, particularly where suitable biodiversity opportunity areas exist. As such we think that local Gaps could have an important role to play in reversing the current trend of biodiversity loss. However, there may be instances where allowing the coalescence of some communities may be acceptable in order to maintain coherent ecological corridors. Therefore it would be our recommendation that the principle of Local Gaps should be retained, but in conjunction with the LNP's ecological network mapping. This approach would ensure that ecological networks across the borough are maintained.

Q34: Should the Local Plan identify and designate Local Areas of Green Space or should this be undertaken via Neighbourhood Plans?

We consider that if local areas of green space are identified and designated in Local Plans, the areas would be more strategic and therefore function better to support a coherent ecological network,

whereas via neighbourhood plans they may tend to be not optimally located and with the risk of being isolated from other areas.

Q35: Should the next Local Plan continue to promote water efficiency from new developments?

As we have stated above in relation to paragraph 5.45, we consider that with the future uncertainties surrounding our water supply as a result of predicted climate change and population growth, we consider that the Borough Council should adopt a precautionary principle and seek to enforce enhanced water efficiency standards. As a society we need to be less wasteful with our natural resources and such practices, combined with efficient water harvesting measures, would go some way in ensuring that water resources are conserved.

Q36: Should we identify suitable sites for renewable energy, including onshore wind, in the Local Plan?

If the evidence base used to inform the Local Plan is of sufficient detail it may be possible for it to inform the location of suitable sites for renewable energy schemes. But it is worth noting that extensive survey work will be required in order to fully assess the impacts of proposals on particular species groups. For example, in order to fully establish impacts of wind turbines on airborne species, such as bats and birds, through collision risk and/or displacement, extremely detailed surveys and assessments will be required.

Q41: Should we continue to set a per dwelling or per hectare standard for recreational open space provision on residential developments? Or, should the Council require the provision of recreational open space on residential developments to be based on the needs set out in the Playing Pitch Strategy?

If standards are set per dwelling, this could lead to smaller parcels of land, which will not be large enough for local recreational needs thereby putting more pressure on wildlife-rich areas and/or nature reserves. As such it may be necessary to allocate areas of open space by the hectare and then allow a set number of dwellings to be built around that area of open space, thereby ensuring that the area of open space is sufficient for the number of users.

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Paragraph 7.29

"Habitats function best where they are well connected to each other. To protect and enhance these networks, national planning policy advises that biodiversity should be conserved and enhanced at a landscape scale. The intention is to identify, enhance and protect networks of interconnected habitats to benefit biodiversity in the long term. The Council along with other authorities in Hampshire are working with the Local Nature Partnership to identify these ecological networks."

We are pleased to see this paragraph and fully support this approach.

Q42: Should alternative open space for mitigation be provided as part of new developments or should land be specifically allocated, or a combination?

The Lawton Report highlights well the need for more, bigger, better and joined up wildlife sites if we are going to stop the current declines in biodiversity. In order to achieve this we consider that it is important that larger areas of open space are created and maintained. If, for example mitigation measures aimed at addressing the issues of recreational pressure on the New Forest are to be effective, mitigation sites will need to be of a sufficient size and character to encourage people to use them. These sites must be linked together as this will also give wildlife the space to flourish and move around. But it is also important that smaller areas are provided within new developments, as this will allow people the open space to enjoy near their homes and help promote their health and wellbeing, as well as providing space for wildlife that is more resilient and less susceptible to disturbance. As such, we think that the best approach would be a combination of larger strategic areas linked to smaller areas within new developments.

The above advice is given based on the information made available at this time and may change should further or amended details be submitted. We trust that you will find our comments helpful and

if you wish to discuss these matters further, please do not hesitate to do so. I also ask that you keep the Trust informed of the progress of this emerging Local Plan.

Yours sincerely

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Senior Specialist for Planning & Development

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