

Planning Policy

From: Lines, Charlotte A. <
Sent: 12 September 2018 14:45
To: Planning Policy
Subject: RE: B3 Issues and Options consultation for the next Local Plan
Attachments: DraftResponse20.8.18.pdf

Dear Planning Policy,

Thank you for consulting the Environment Agency on you Issues & Options consultation.

We have reviewed the document and attach our comments for your consideration.

Many thanks,

**Charlotte Lines | Principal Planning Officer Sustainable Places West | Solent and South Downs Area | Environment
Planning and Engagement | Environment Agency |**

We are currently experiencing a high level of workload and dealing with a large volume of incident work due to the extended dry weather.

Whilst we will endeavour to respond to your consultation/enquiry we anticipate that there may be a delay in our response. We apologise for any inconvenience this may cause.

From: Planning Policy [[mailto:charlotte.lines@environment-agency.gov.uk](#)]
Sent: 06 July 2018 11:22
Subject: B3 Issues and Options consultation for the next Local Plan

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.



Test Valley Borough Council

Response to Issues & Options consultation August 2018

Thank you for consulting the Environment Agency on Test Valley Borough Council's Issues and Options Consultation for the next Local Plan – July 2018.

We have provided a response which sets out key matters which we believe will need to address as you look to prepare your new local plan for the period up to 2036.

As a general comment it is our view that Sustainability should be at the core of your next local plan, yet there is little reference to sustainable development/growth throughout the document.

5 – Living in Test valley

Where should growth go?

A key part of your evidence base which will inform where development is located throughout the borough is your Strategic Flood Risk Assessment (SFRA). Your SFRA will need to be updated ensuring its fit for purpose, it should be used to inform the Sustainability Appraisal, and should be used to apply the sequential test in accordance with the National Planning Policy Framework (NPPF) [paragraph 155], demonstrating that inappropriate development in areas at risk of flooding have been avoided by directing development away from areas at highest risk (whether existing or future).

In accordance with NPPF paragraph 157 all plans should apply a sequential, risk based approach to the location of development – taking into account the current and future impacts of climate change so to avoid, where possible, flood risk to people and property through the application of the Sequential Test.

5.9-5.10

We would support the promotion regeneration of previously developed land across the borough providing that they are appropriate uses in appropriate places.

Public Open Space Public open space shouldn't just be considered area for people to recreate. Protecting and creating multi-functional green spaces for the residents of TVBC and which connect to neighbouring LA's green spaces should be fundamental to the Local Plan. If green space is incorporated through robust policies and comprehensive master planning then it has the ability to improve health and wellbeing, provide sustainable transport links, manage surface water, tackle climate change and provide a biodiversity net gain for the borough.