

## Planning Policy

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**From:** Eastley, Karen  
**Sent:** 20 September 2018 15:24  
**To:** Planning Policy  
**Subject:** FW: Issues & Options Consultation response  
**Attachments:** 252355 Issues and Options Test Valley Borough Council.pdf

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**From:** Brown, Nicola (NE) [<mailto:nicola.brown@naturalengland.gov.uk>]  
**Sent:** 20 September 2018 14:31  
**To:** Smith, Graham; Eastley, Karen  
**Subject:** Issues & Options Consultation response

Hi Graham and Karen

Please see attached Natural England's comments on the Issues & Options consultation for the local plan – if you have any questions on these please call me on

Thanks again for the extension to get these over, I am hoping for a new computer soon!

Did the SANG purchase go ahead ok? I updated Alison and she was really pleased to hear it was sounding so positive.

Kind regards  
Nicola

New Forest Lead Advisor  
Dorset, Hampshire and Isle of Wight Area Team

Office  
Mobile:

Please note my current working pattern is Monday, Thursday, Friday and every other Tuesday.

www.naturalengland.gov.uk

**We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.**

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

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Date: 18 September 2018  
Our ref: 252355  
Your ref: B5 Issues and Options Consultation

10140



Graham Smith  
Test Valley Borough Council

Customer  
Services

**BY EMAIL ONLY**

Dear Graham

B5 Issues and Options Consultation for Local Plan

Thank you for your consultation on the above dated 06 July 2018 which was received by Natural England on 06 July 2018

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Specific comments:

*Para 2.7:* Natural England welcomes the work to create an up to date evidence base to identify issues and options for the Local Plan. The use of robust environmental evidence will enable the council to consider different development options against the key features of the natural environment both within and outside the borough boundary. NPPF paragraph 165 encourages Local Authorities to work with Local Nature Partnerships where appropriate and that this should include an assessment of existing and potential components of ecological networks.

*Q1&3:* The natural environment is a key asset for the borough of Test Valley; making it an attractive place to live, work and visit. Natural England would like to see the natural capital assets within the borough recognised within the Local Plan with an aspiration to grow and improve these in the next 20 years.

*Where should the growth go?:* Natural England would welcome clear criteria for development allocations and for the Local Plan to identify land where development would be inappropriate, for instance because of its environmental or historic value, seeking to allocate land with the least environmental or amenity value, where consistent with other policies in the NPPF.

*Q23:* Natural England would welcome a policy within the Local Plan on health and wellbeing and the role that planning can play in promoting active and healthy lives. Well planned green infrastructure within and connecting developments encourages people to lead more active lives and provides improvements to mental health. We would welcome any policy recognising the importance of the natural environment to deliver improvements in health and wellbeing for Test Valley residents.

#### *Air quality:*

Natural England agrees that new developments and infrastructure have the potential to impact on designated sites both within and outside the borough, as part of the evidence base collated for the Local Plan we would welcome consideration of changes to air quality as a result of housing and infrastructure delivery within the borough.

#### *Water quality and supply:*

The River Test is identified as a key asset for the borough and Natural England welcomes the recognition of the pressures on this designated river. Where appropriate we would expect the local plan to address water quality and resource issues within its policies and the scope of the planning system.

#### *Biodiversity*

Natural England welcomes the work being undertaken by Test Valley Borough Council along with the Local Nature Partnership to identify ecological networks across the Hampshire area. These will provide an important evidence base to enable the council to identify, assess and improve the natural environment.

In line with the new NPPF we would expect the local plan to include a policy setting out the council's intention to achieve net gain through all developments. The policy should be supported by as much information as possible on how to assess and achieve net gain

### General Comments

#### *Green Infrastructure*

In accordance with the NPPF the plan should plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. A well planned strategic approach to green infrastructure will help deliver the council's vision for the borough, in particular health and wellbeing, green space, flood risk and climate change adaptation.

Provision of green infrastructure should be planned alongside and in line with planning of other infrastructure such as transport, schools and health services.

#### *Sites of Least Environmental Value*

In accordance with the NPPF, the plan's development strategy should seek to avoid areas of high environmental value. Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and should consider the direct and indirect effects of development or land within the setting of designated landscapes.

#### *Geodiversity*

There should be consideration of geodiversity conservation in terms of any geological sites and features in the wider environment, if applicable.

#### *Soils*

The Local Plan should give appropriate weight to the roles performed by the area's soils. Whilst soils are mentioned in the Sustainability Appraisal there is little mention in the Issues and Options consultation document. These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.

The plan should safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future.

To assist in understanding agricultural land quality within the plan area and to safeguard 'best and most versatile' agricultural land in line with the National Planning Policy Framework, strategic scale Agricultural Land Classification (ALC) Maps are available. Natural England also has an archive of more detailed ALC surveys for selected locations. Both these types of data can be supplied digitally

free of charge by contacting Natural England. Some of this data is also available on the [www.magic.gov.uk](http://www.magic.gov.uk) website. The planning authority should ensure that sufficient site specific ALC survey data is available to inform plan making. New ALC surveys may be required for sites allocated in the plan.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

If you have any queries relating to the advice in this letter please contact me on ( )

Yours sincerely

New Forest Team