

Test Valley Borough Council Next Local Plan - Refined Issues and Options Consultation

COMMENTS FORM

Test Valley Borough Council has published for public participation its Refined Issues and Options document. This is the second stage of preparing the next Local Plan, which follows the Issues and Options consultation in 2018.

You can respond to our consultation by filling out the form below. Further information can be found on our website at: www.testvalley.gov.uk/nextlocalplan

The consultation period runs from Friday 3 July 2020 to 4.30pm on 28 August 2020. Please respond before the close of the consultation period.

Once the form has been completed, please send to

If you are unable to send via email, please send a postal copy to our address below.

Contacting us

We are happy to help. If you have any queries, please contact us at:
Planning Policy and Economic Development Service
Test Valley Borough Council
Beech Hurst
Weyhill Road
Andover
SP10 3AJ

Tel: 01264 368000

Website: www.testvalley.gov.uk/nextlocalplan

Part A: Your Details

Please fill in all boxes marked with an *

Title*		First Name*	
Surname*			
Organisation* <i>(If responding on behalf of an organisation)</i>			

If you wish your comments to be acknowledged and to be kept informed of progress, please provide your email address below:

Email Address*	
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If you don't have an email address and wish your comments to be acknowledged and to be kept informed of progress, please provide your postal address.

Address*			
	Postcode		

If you are an agent please give the name/company/organisation you are representing:

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Personal Details and General Data Protection Regulation

Please note that representations cannot be treated as confidential. If you are responding as an individual, rather than as an organisation, we will not publish your contact details (email/postal address and telephone number) or signatures online, however the original representations will be available for public viewing at our offices by prior appointment. All representations and related documents will be held by the Council for a period of 6months after the next Local Plan is adopted.

The Council respects your privacy and is committed to protecting your personal data. Further details on the General Data Protection Regulation and Privacy Notices are available on our website

<http://www.testvalley.gov.uk/aboutyourcouncil/accesstoinformation/gdpr>

Part B: Your Comments

Please use the boxes below to state your comments and questions. Please make it clear which paragraph or question your comments relate to where possible.

Paragraph / Question Ref	Comments
2.5	<p><u>The TVBC Local Plan must address the greenhouse gas emissions of the built environment.</u> The built environment currently contributes approximately 50% of the UK's annual greenhouse gas emissions (para 1.4 of http://www.zerocarbonhub.org/sites/default/files/resources/reports/Definition of Zero Carbon Homes and Non-Domestic Buildings.pdf) and the total emissions from building (constructing and operating) is still increasing. In addition the Local Plan must address the need to increase biodiversity and the reduction of water consumption and contamination.</p>
5.36	<p>The council should have a specific policy on self-build homes that is advertised and local residents regularly invited to apply to join the register. Self-build homes are likely to be more sustainable than the mass produced alternatives.</p>
5.39	<p>The introduction of a self-build housing policy is a good opportunity for the Council to tackle the issue of climate change but they do have to be flexible about the types of sites to allocate. A build aiming to increase biodiversity could need more space than a traditional modern build that reduces local biodiversity, for example.</p>
7.1	<p>Over the last century or so the UK has suffered massive species collapse. The biodiversity change that will occur with the development of a site can be calculated using Natural England's Biodiversity Metrics 2.0 (JP029) methodology (http://publications.naturalengland.org.uk/publication/5850908674228224).</p> <p><u>The TVBC Local Plan must mandate a level of improvement in biodiversity that must be made by all housing developments over what is currently provided by the proposed site.</u></p> <p>All development should positively contribute to biodiversity gain, restored ecosystems and people's access to nature by contributing new habitat features commensurate with the scale of development.</p>
7.11	<p>Site density should be guided by biodiversity calculations, particularly to encourage tree coverage but also other biodiverse environments like shrub-land and wetlands. Again the Natural England JP029 calculations can be used to support this.</p>

7.28

The NPPF states that Local Plans must have provisions for addressing climate change and sustainability.

- The NPPF states that there should be a *'presumption in favour of Sustainable Development'* (paragraphs 10 and 11).

- The NPPF contains a definition of Sustainable Development (paragraph 7). It states: *'At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs'*.

It is now totally clear that the current levels of carbon emission from current building techniques and standards are *'compromising the ability of future generations to meet their own needs'* and so are not sustainable under the NPPF definition.

- The NPPF specifically binds planning policy to the Climate Change Act commitments to Carbon emission reduction. In paragraph 149 it states that *'Plans should take a proactive approach to mitigating and adapting to climate change ... In line with the objectives and provisions of the Climate Change Act 2008'*.

- Paragraph 1 of the Climate Change Act states that *'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'*.

The Plan should mandate the highest level of minimum building requirements allowed. Something approaching fully Sustainable Development can be mandated and achieved. This level is being incorporated into a number of council's emerging draft local plans (for example Greater London has proposed a 35% improvement over Building Regulations – see page 331 of https://www.london.gov.uk/sites/default/files/draft_london_plan_-_consolidated_changes_version_july_2019.pdf). Lower levels, but higher than building regulation minimums, have been incorporated into 'approved' plans. (for example, Ipswich, Cambridge and Brighton and Hove have all mandated a 19% improvement in carbon emissions over minimum Part L 2013 Building Regulations, into their Plans).

The new TVBC Local Plan must mandate a 35% improvement over current minimum Building Regulations.

Please use next page if necessary

7.28 continued	In addition the Local Plan should encourage 'exceptional development' that exceeds the mandated minimum standards using the NPPF paragraphs 78 and 79. This could be via, for example, (a) the allocation of sites that are only available to such development (b) by inviting applications anywhere and judging them on a case by case basis or (c) by mandating that all approved development sites include an area reserved for this sort of development (e.g. 10%).
7.39	The TVBC Local Plan should mandate a minimum area of tree canopy that major new developments must provide. All new sites outside of the town centres and of 0.5ha or more in size must achieve a future canopy cover of 15% or more of the site area through retention and planting of trees.
7.40	<p>In the UK we use expensive drinking quality water to flush our toilets, water our gardens, wash our cars etc.</p> <p>In the South of England we get 800-900mm of rainwater a year. If this was collected from roofs it would provide at least 30%-35% of the water required and the additional infrastructure required in each home would pay for itself in the 10-15 year timeframe at the most.</p> <p><u>The TVBC Local Plan must mandate inclusion of rain harvesting technology in new developments. Building firms need to be forced to prioritise long term savings over minimising the house price at the point of sale.</u></p>
7.43	<p>The use of local integrated constructed wetlands (ICWs) should be encouraged as with the example from Norfolk : https://norfolkriverstrust.org/ingoldisthorpe-wetland-creation-natures-own-water-treatment/ . These are particularly appropriate for developments not connected to the sewerage network. They also help enhance biodiversity and the natural landscape.</p>
8.27	<p>Where local mitigation is not possible for (a) carbon emission (b) water pollution (e.g. using ICWs) and/or (c) biodiversity increase then the Plan should enforce CIL or Section 106 type levies to obtain contributions from developers to off-set elsewhere (e.g. funding the Hampshire and IOW Wildlife Trust nitrate offset scheme https://www.push.gov.uk/wp-content/uploads/2020/01/FINAL-Nutrients-Update-Joint-Committee-10-February.pdf) .</p>

What happens next?

All valid responses will be acknowledged and you will be given a reference number. Please quote this number when contacting the Council about the next Local Plan. If you have an agent acting on your behalf, correspondence will be sent to your agent.

All response received will be taken into account as part of the preparation of the next Local Plan.

