1.13 Community Involvement

The Council's approach to preparing the next Local Plan 'builds upon the Council's commitment to greater engagement and partnership with local communities.'

- The consultation period runs from Friday 10 July to Friday 28 August 2020 7 weeks.
 Planning is more effective when the people it affects are an integral part of the process. If consultations are low key with few responses, notwithstanding Covid, I am concerned that some of our wider community may not be able to fully participate in shaping the future of this area.
- Phrasing of questions. I (and others who I have spoken with) think that the wording of the
 questions in the consultation were too technical or convoluted and might put some people
 off from providing any comments. I wondered whether TVBC had a language review
 person/panel before future documents are published.
- A summary of responses from the first consultation in 2018 do not seem to be available on TVBC's website.

2.27 Withdrawal from the EU

2.28 EU regional funding will be replaced by the UK Shared Prosperity Fund. The scheme for rural businesses is not yet known.

As agriculture will be operating outside of the EU's Common Agricultural Policy (CAP) I would like TVBC to provide reassurance or to ensure that the same level of support and access is made available to rural businesses in this area.

2.29 Coronavirus (COVID-19)

- The pandemic has delivered a profound shock to the UK. Given the uncertainty, I am pleased to note the comment that the next Local Plan will seek to address any consequences.
- The pandemic could provide an opportunity for the local economy such as valuing and appreciating local suppliers and producers whilst encouraging locals to spend locally, e.g. shop local, stay local.
- I would like to know if TVBC might be considering a Recovery Plan or a revised version of the Economic Development strategy (produced February 2017) which aligns with the Local Plan.
 For example, there might be opportunities for different office spaces in different locations.
- Local voluntary groups became local champions during lockdown. There was also a greater sense of community which should be galvanised. The revised Local Plan might want to include a section on how some of those local voluntary groups are an integral part of community needs during a crisis. There is a section on Local Resilience (8.26) but it does not mention local voluntary groups.
- The Local Plan might want to consider how local perceptions and needs have changed.

2.32 Sustainability Appraisal

Looking at the Sustainability Ability Scoping Report, it does not seem to set out the objectives for Energy, Fisheries, Forestry, Waste Management, and Tourism.

I would like TVBC to consider adding the following content:

The council will work proactively with applicants and the community to identify solutions which mean that proposals can be approved wherever possible, in order to secure development that, as a whole, improves economic, social and environmental conditions in the area, tackles the climate crisis and supports nature's restoration and recovery.

Town Centres

Town centres face growing competition from changing shopping habits, in particular online retail. Adaptation and diversity are key to their long-term future, supported by a robust local planning framework.

I suggest that all plans set a local threshold for carrying out an impact assessment of retail and leisure uses outside town centres. This should be set at a level that prevents schemes from being approved that would harm a town centre due to their size, but is not set so low that it interferes with the provision of smaller individual shops and parades which communities require and benefit from and which Local Plan policies should support, protect and encourage.

Section 5 - Living in Test Valley

Evidence Base - Brownfield Register

TVBC's Evidence Base Brownfield Register includes nearly 13 hectares of sites. Four sites have full planning permission, including the Former Brewery Site in Romsey. I consider that development of such sites is far more sustainable than developing on sites proposed in rural communities. Local government need powers to force developers to work in partnership to ensure sites which have been granted planning permission are developed.

In order to achieve sustainable development, encourage sustainable modes of travel and protect and conserve areas of recognised environmental and amenity importance, we suggest that the Local Plan adopt the following approach in policy to guide the selection of sites and locations for development:

- the re-use of previously developed land and buildings (brownfield sites) within urban areas provided it is not of high environmental value;
- other previously developed land well connected to public transport links;
- locations within urban areas, subject to the need to protect and conserve areas of recognised environmental and amenity interests;
- other sites and locations which are well located for achieving sustainable development and reduce the need to travel.

Evidence Base - Local Economy

I note that an Employment Land Study Addendum Report was carried out in 2018 (an update from the study carried out in 2016).

In view of COVID-19 I consider that the Local Plan should make further provision for smaller, flexible employment sites due to possible changing trends in the workplace. Such changes could help diversify the local economy and lead to the development of indigenous business.

5.35 The Council will also consider whether the next Local Plan should include a policy on internal space standards (higher national described space standards) and accessibility standards for new housing.

- I would like TVBC to include a policy to ensure that new developments are of good quality with green space as well as being well supported by services and infrastructure. This also ties in with the Local Plan's section on health (section 8) noting in particular concerns about noise, air quality, excessive shade (tall buildings), lack of good quality cycling routes, and poor provision of green space in densely populated areas.
- I wondered if those involved in local planning had considered what makes Test Valley special and distinctive.

Housing Requirement

5.8 Methodology The current expectation is that the Council will use the Government's standard methodology for the next Local Plan...

- House prices have been increasing in the area with a 22% increase in the average house price between 2014 and 2018 [source: TVBC Housing Strategy 2020:2025]. Demographic projections also evidence an ageing population in Test Valley. I would like TVBC to further explore and debate why they will use the Government's standard methodology in this area given the aforementioned. Are the targets realistic, sustainable and deliverable in Test Valley? Housing targets should not be forced on local areas without sufficiently engaging local communities and businesses and local government. The quality, affordability and location of new housing are key consideration.
- I believe that strategic development sites should include a range of housing including starter homes, self-build, housing for older people and supported housing. A criteria-based policy for meeting specific housing needs should be further explored.
- I am deeply concerned about the latest announcement from Government giving automatic planning permissions without the consent of local government. This could result in a 'free pass' to developers to build what they like. It is imperative that cheap, poorly designed and densely packed estates, with little in the way of green space, adequate parking and nice design features are avoided to enable residents to have a good quality of life. It is important that local people and local councillors have a chance to support or reject proposals.
- I am concerned about the impact developing some sites would have on pollution levels.
 TVBC should recognise existing problems of poor air, water and soil quality and acknowledge the potential negative cumulative impact further development will have on these areas.
 Development should, wherever possible, help to improve local environmental conditions such as air and water quality.
- I would like TVBC to ensure that re-development of previously developed land and converting and re-using buildings in preference to developing greenfield sites. Alongside this, we advocate the use of phasing to ensure that land allocated for development is proactively brought forward at a rate which encourages the re-use of urban land, except where this land is of high environmental value, and an important green or public space which should be protected.

Section 6 Working in Test Valley

Local Economy

We are about to enter a period of uncertainty – post-Covid and withdrawal from the EU. If the revised Local Plan is aligned with the Economic Development Strategy, it might need to consider any opportunities and threats to the local economy. To enable a thriving community and local economy

all stakeholders should be fully consulted and included in the revised Local Plan, including the Chamber of Commerce.

Skills and Training

I note that there is no inclusion of how the Local Plan might address any skills shortages such as the construction skills shortage in the Borough.

Government Funding & Finances

How is TVBC going to secure funding to support some of the improvements and suggestions in the Local Plan? Which future funding streams might be available?

Section 7 Enjoying Test Valley (Environment and Quality of Life)

Section 7.26

- 1. Has a greenhouse gas emission audit been completed to enable progress of the plan against CO2 commitments to be measured?
- 2. Is the Local Plan designed to achieve a net reduction in greenhouse gas emissions in line with the provisions of the UK 2050 net zero target and Climate Change Act?
- 3. Is there an Area Action Plan and site allocation policy for housing, mixed use or employment which can also require provision to be made for renewable energy either standalone or integrated as part of the development?
- 4. Has TVBC undertaken a study to comprehensively assess the potential for the deployment of renewable and low carbon technologies in the? (This should include both commercial scale renewables and micro generation (including on-site and building-integrated renewables) and district heating.
- 5. Adaptation to climate change will developments be able to demonstrate how they have been designed to incorporate measures to adapt to climate change?

Section 8 Health

As mentioned above, future developments and Local Plans must avoid homes which result in poor air quality due to an increase in traffic (harmful emissions), poor design quality, poor provision of green spaces and over development.

The Local Plan might want to ensure the provision of green space on and around buildings, an increase of tree planting as part of reallocation of road space, essentially protecting green space and maximising opportunities to provide new green space.

The Local Plan might want to use Health Impact Assessments within the planning process to help to identify changes that can be made alongside new development to enhance any urban infrastructure.

Community Infrastructure Levy

In light of COVID-19, the revised Local Plan might want to consider how arts and cultural venues and leisure facilities in TVBC will be given extra support to ensure their survival.

Infrastructure

The need to provide essential infrastructure to support development is crucial and should be taken seriously - to enable access and other connections, generate energy, deal with waste etc. The need for infrastructure to support communities, for example schools, parks, doctors' surgeries, village

halls and other community facilities, as with flood risk, water quality, and water treatment are fundamental in the planning process and as part of the Local Plan.

All development should be required to protect and enhance both biodiversity and green infrastructure features and networks both on and off-site for the lifetime of the development.

Transport, Communications & Movement

Rising traffic levels are causing major environmental, economic and social problems throughout the country. Is there a Local Transport Plan in TVBC?

As Braishfield is on the edge of major developments in both Abbotswood and Ganger Farm, the village and its rural lanes is seeing an increase in traffic driving (and often speeding) through its narrow rural lanes. The Local Plan should include local policies which seeks to address soft measures and road safety in villages such as Braishfield. We cannot build our way out of congestion!

COVID-19 has resulted in an increase in cycle use. TVBC might want to harness this by better promotion of cycleways and footpaths within new developments, and promotion of the benefits of cycling and walking in schools.