

# 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](http://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](http://www.testvalley.gov.uk/nextlocalplan)

## Part A: Your Details

Please fill in all boxes marked with an \*

Title*		First Name*	
Surname*			
Organisation* (If responding on behalf of an organisation)			

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
	<p>The Woodland Trust is the UK's leading woodland conservation charity: we want to see a UK that is rich in native woods and trees, for people and wildlife. We aim to achieve this by restoring and improving woodland biodiversity and increasing people's understanding and enjoyment of woods and trees.</p> <p>We own over 1,275 sites across the UK, covering a total of over 23,580 hectares and we have around 500,000 members and supporters. The Trust is recognised as a national authority on woods and trees and a protector of the benefits and values that they deliver for society.</p> <p>We welcome the opportunity to comment on the Test Valley Refined Issues and Options Consultation.</p>
2.5	<p>We welcome the recognition of the key role of land use for long term climate adaptation and resilience and the importance of strategic woodland creation and tree planting as part of that.</p> <p>We also welcome the commitment to supporting biodiversity, protecting and providing space for nature, and retaining wildlife corridors and networks.</p>
Chapter 5	<p>The Trust has no position on settlement boundaries or hierarchy <i>per se</i>. It is however essential that in future strategic and individual development site allocations, that protections for ancient woodland and veteran trees are included and that development which would result in the loss of ancient woodland, aged or veteran trees should not be permitted. We recognise the intense pressure to identify and bring forward new sites for housing and employment uses. This pressure makes it all the more important that vital protections for ancient woodland and veteran trees are upheld.</p> <p>The Woodland Trust objects to ancient woodland areas being included in sites allocated as suitable for development. Areas of natural woodland, in particular ancient woodland, are vulnerable to pollution, encroachment from development, and habitat fragmentation. It is important that any development is located and designed to avoid damaging ancient woodland, providing buffers for designated sites and protecting connectivity between wildlife habitats. Further information is available in the Trust's <i>Planners' Manual for ancient woodland (2019)</i>.</p>
6.23	<p>We welcome the recognition of the importance of rural land use for the environment and the economy, and the potential of a public funds for public goods approach. The UK CCC Land Use report identified that up to 20% of agricultural land should be repurposed for carbon sequestration uses. There are a number of tree-led land uses that can deliver social, economic and environmental benefits, including agro-forestry, tree nurseries and woodland burial sites. We would encourage support for such land use in the Test Valley Local Plan.</p>
7.15	<p>In considering local gaps, we would encourage a policy based on quality rather than necessarily quantity, as part of wider ecological mapping and green infrastructure plans. Local gaps between settlements have potential to make a valuable contribution to biodiversity net gain, by connecting and</p>



	buffering habitats, and can provide good locations for new tree planting, which will enhance the environment for surrounding residential areas.
7.25	We would encourage including notable veteran trees that are an important part of the urban landscape as heritage assets.
7.32	<p>We welcome the publication of local ecological mapping for Hampshire, including areas of ancient woodland, and its incorporation as part of the evidence base for the Test Valley Local Plan. We urge further survey work to identify areas of ancient woodland under 2ha.</p> <p>We would encourage the inclusion of the emerging plans for a Hampshire Community Forest as part of the County Council's tree strategy 2020 in the Test Valley Local Plan.</p>
7.33	We would encourage Test Valley to adopt a net gain target in anticipation of the expected statutory requirement. Net gain can be delivered through allowing natural regeneration of woodland and woodland restoration, as well as new planting. In particular, we would encourage identification of PAWS (Plantation on Ancient Woodland Sites) for restoration to native woodland in order to achieve net biodiversity gain and halt species decline. In more urban areas, trees outside woods provide valuable micro-habitats and contribute to habitat connectivity.
7.37	<p>We support the principle that residential developments should have access to the natural environment, including to woodland.</p> <p>We recommend adopting policy standards for residential developments that support access to the natural environment and woodland for informal recreation.</p> <p>Natural England's Accessible Natural Green Space Standard recommends that all people should have accessible natural green space:</p> <ul style="list-style-type: none"> <li>– Of at least two hectares in size, no more than 300m (five minutes' walk) from home.</li> <li>– At least one accessible 20-hectare site within 2km of home.</li> <li>– One accessible 100-hectare site within 5km of home.</li> <li>– One accessible 500-hectare site within 10km of home.</li> <li>– A minimum of one hectare of statutory local nature reserves per 1,000 people.</li> </ul> <p>The Woodland Trust has developed a Woodland Access Standard to complement the Accessible Natural Green Space Standard. This recommends that:</p> <ul style="list-style-type: none"> <li>– That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size.</li> <li>– That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes.</li> </ul>
7.38	We encourage having a district-wide green and blue infrastructure network, based on ecological mapping, to connect and protect valuable habitats as part of a wider local nature recovery network. Such an approach will maximise the benefits for people and nature, and provide the best basis for measuring and delivering biodiversity net gain.
7.39	We strongly encourage the development of a tree canopy cover requirement for Test Valley, as part of the Local Plan and also to be reflected in other council plans and strategies. This could be delivered through the retention of important trees, appropriate replacement of trees lost through development, ageing or disease and by new planting to support green infrastructure. One successful model is the Canopy Cover SPD developed by Wycombe Council (now the

	Wycombe area of Buckinghamshire unitary council) with a 25% canopy cover target for development sites. The Woodland Trust supports an increase in UK woodland cover from its current 13% of land area to 19% by 2050 to tackle this country's biodiversity and climate crises. As part of that, the Trust recommends a target of ensuring all development land includes a minimum 30% tree canopy cover. A local target would contribute to the Hampshire County Council target of planting one million trees by 2050 and assist in meeting the challenge recognised by Test Valley Borough Council's climate emergency declaration.
7.44	<p>We recommend including natural management techniques for water conservation and flood management. Creating create shade over rivers (riparian shade) is important for maintaining suitable freshwater habitats at risk from the effects of climate change. Trees help stabilise river banks from erosion, trap and retain nutrients such as phosphates and nitrates, and help capture sediment in polluted run-off before it reaches rivers and streams. Further guidance is available in the Trust publication, <i>Keeping Rivers Cool: A Guidance Manual Creating riparian shade for climate change adaptation</i>.</p> <p>Natural flood management techniques can make an important contribution and should be part of the resilience strategy. Measures such as leaky dams help slow and store water upstream, in order to reduce flooding downstream. In addition to flood protection, natural flood management provides multiple biodiversity enhancements and natural capital benefits. A positive example is the restoration of floodplain woodland in the Lymington river catchment.</p>
7.46	We support the principle that development must make a positive contribution to local air quality, taking into account the cumulative effects of other proposed or existing sources of air pollution in the locality. Ancient woodland is greatly at risk from ammonia pollution. We recommend therefore adding specific requirements in the Local Plan policies that additional screening will be required of all ammonia-emitting developments, such as intensive livestock units, within 5km of an ancient woodland site.
8.3	We would encourage inclusion of green infrastructure as an integral part of the local infrastructure plan. Where new infrastructure is proposed, we encourage policies that explore its potential for delivery of major tree planting and woodland creation, the construction of wildlife bridges and green corridors and the restoration of damaged ancient woodland.
8.4	We would encourage including green infrastructure as among the suitable categories for CIL funding.

**August 2020**

### **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.

