

# Test Valley Borough Council Consultation for Local Plan 2040 Regulation 18 Stage 1

## COMMENTS FORM

Test Valley Borough Council has published its Local Plan 2040 Regulation 18 Stage 1 document for public consultation. This consultation document sets out draft strategic planning priorities for Test Valley supported by a number of strategic policies.

The consultation period runs from Friday 11 February to noon on 8 April 2022. Please respond before the close of the consultation period so that your comments may be taken into account.

You can respond to our consultation by filling out the form below. This form has two parts:

Part A: Your Details

Part B: Your Comments (please fill in a separate sheet for each comment you wish to make)

Further information can be found on our website at:

[www.testvalley.gov.uk/localplan2040](http://www.testvalley.gov.uk/localplan2040)

Once the form has been completed, please send to  
[REDACTED] by **noon on 8 April 2022**.

Following receipt of your comments from, we will keep you informed of future consultation stages unless you advise us that you want to opt out of such communication.

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

### Contacting us

Planning Policy and Economic Development Service  
Test Valley Borough Council  
Beech Hurst  
Weyhill Road  
Andover  
SP10 3AJ

Tel: [REDACTED]

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

Email: [REDACTED]

## Part A: Your Details

Please fill in all boxes marked with an \*

|  |                |                |           |
|--|----------------|----------------|-----------|
| Title*<br>Mr/Mrs/Miss/Ms/Dr/Other<br>(please state)              | Ms             | First<br>Name* | Charlotte |
| Surname*   | Mayall         |                |           |
| Organisation*<br>(If responding on behalf<br>of an organisation) | Southern Water |                |           |

Please provide your email address below:

|                   |  |
|-------------------|--|
| Email<br>Address* | ██ |
|-------------------|--|

Alternatively, if you don't have an email address please provide your postal address.

|  |  |          |
|--|--|----------|
| Address*                                 | ██ |          |
| ██ |  |          |
|  | Postcode                                 | ████████ |

If you are an agent or responding on behalf of another party, 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 6 months 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. Insert any general comments you may have that do not relate to a specific paragraph number or policy in the general comments box. For specific comments, please make it clear which paragraph, policy or matter your comments relate to where possible.

If you are suggesting a change is needed to the draft Local Plan or supporting document, it would be helpful if you could include suggested revised wording.

If you are commenting on a document supporting the draft Local Plan (such as a topic paper, or the Sustainability Appraisal), please indicate so.

### General

Southern Water is the statutory water and wastewater undertaker for most of Test Valley Borough. As such, we welcome the opportunity to comment on aspects of the local plan that impact and influence our service provision to existing and future residents of the Borough, who are also Southern Water's customers. In line with the National Planning Policy Framework (NPPF), our aim is to ensure local plans include policies that;

- a) require all new development to achieve water efficiencies of 110 l/p/d or lower, or BREEAM Excellent for commercial development (NPPF para 153),
- b) promote water recycling and the use of SuDS in all new development in order to attenuate flows at source and ensure surface water is not permitted to enter the foul or combined drainage system ([suds-outline-guidance.pdf \(southernwater.co.uk\)](https://www.southernwater.co.uk/suds-outline-guidance.pdf)) (NPPF paras 153, 169),
- c) support the provision of new, or upgrades to existing, strategic water and/or wastewater infrastructure. This will help to ensure timely provision of additional capacity to meet the demand arising from new development (NPPF para 20(b)),
- d) support, for each allocated housing site where Southern Water has identified a need, the timely provision of local wastewater network reinforcement that may be specifically required to accommodate new development in order to limit the risk of sewer flooding (NPPF para 20(b)),
- e) protect the quality and potential yield of groundwater and surface water sources (NPPF paras 174(e) and 185),
- f) require phasing of developments when existing infrastructure and treatment capacity is insufficient to meet the increased demand (NPPF para 20(b)), and
- g) do not adversely impact the continued efficient operation of existing water and wastewater facilities (NPPF para 187).

| Paragraph Ref | Specific Comments  |
|---------------|--|
| 4.14          | <p>Southern Water is the water supplier for the majority of Test Valley Borough, and supplies in this area are sourced from 100% groundwater. Therefore, with reference to policies and strategies on water management, we would like to see this include policies that support the protection of the yield and quality of groundwater resources. Inclusion of appropriate policies applicable to development within Source Protection Zones will be supported, as well as preventing any development that would lead to unacceptable deterioration in the quality and potential yield of groundwater sources. New sources of supply are challenging and costly to set up, it is therefore important that existing sources are used as sustainably as possible. Policies requiring water efficiency, water re-use and the protection of existing resources will be key to helping achieve sustainable development and mitigate the impacts of climate change. This will also help to address our aims (a) and (e) as set out in the General section above.</p>   |
| 4.30          | <p>Within the section on Countering Climate Change, we would like to see policies that will effectively help to reduce the amount of rainfall getting into the sewer system. This will have multiple benefits including reducing the risk of pollution from sewer flooding and frequency of storm overflows, and freeing up capacity for foul flows, facilitating connections from new development. This adaptation is needed in urban environments in order to manage surface water differently, and to respond to the impacts of climate change, such as increased storm frequency, in a sustainable way. One way of achieving this is to require development to move away from impermeable surfaces, tiled roofs and rapid rainfall runoff, towards permeable paving, green roofs and measures to “slow the flow” at source. Making space for water in the urban environment will be critical too – green spaces, urban forests, tree pit SuDS etc – will reduce dependency on drainage infrastructure whilst at the same time creating places for people to access to improve their health and wellbeing (NPPF paras 20(d), 92(c), 120(b), 131, 169(d)).</p> <p>Detailed policy matters could also include water re-use and grey water recycling as ways of achieving lower than the optional building regulations standard for water efficiency of 110 l/p/d, as well as requiring SuDS in all new development. This will help to address our aims (a) and (b) as set out in the General section above.</p> |
| 4.41          | <p>We are pleased to note that the council are considering water supply and wastewater treatment capacity, which are essential services for new development. Whilst the water industry’s 5 yearly investment planning cycle is not always in sync with Local Plan preparation, the local plan will set out strategies for growth within the Borough over a 15-20 year period, which provides repeated opportunities through the 5 yearly business plan to include any investment needed to accommodate it. To support this, we would encourage policy to require phasing of developments should existing infrastructure and treatment capacity be insufficient to meet the increased demand. This is particularly important when necessary investment has long lead-in times, and implementation is subject to delays beyond Southern Water’s control. This will help to address our aims (c) and (f) as set out in the General section above.</p>   |

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| 4.58  | In addition to good design, development should also consider its location as a contributory factor to the health and amenity of future users. Taking NPPF paragraphs 174(e), 185 and 187 into account, Southern Water considers that placing sensitive receptors, such as new housing development, in close proximity to existing wastewater treatment works, should be avoided. This is due to odours that inevitably arise as a result of the processes involved in treating wastewater. Whilst not strictly speaking a harmful air pollutant, odour, like noise, can have negative impacts on the amenity of nearby receptors. Policy should therefore seek to protect the amenity of future occupants of development by ensuring it is appropriate to its location. This will help to address our aim (g) as set out in the General section above. |
| 4.116 | We support the requirement for development to be phased in tandem with the progress of the build out of development, and will in future consultations request that this be added to any site allocation policies where we have identified that capacity constraints exist in the local sewer network. This will help to ensure that any requisite network upgrades can be delivered ahead of the occupation of development, thus minimising the risk of sewer flooding. This will help to address our aim (d) as set out in the General section above.   |

*Please use next page if necessary*

### **What happens next?**

All valid responses received within the consultation period will be acknowledged and you will be given a reference number. Please quote this number when contacting the Council about the Local Plan 2040. If you have an agent acting on your behalf, correspondence will be sent to your agent.

All responses received will be taken into account as part of the preparation of the Local Plan 2040.