

Test Valley Borough Council Consultation for Local Plan 2040 Regulation 18 Stage 2

COMMENTS FORM

Test Valley Borough Council has published its Local Plan 2040 Regulation 18 Stage 2 document for public consultation. This consultation document sets out a vision for Test Valley up to 2040, objectives for achieving this vision, our development needs alongside allocations for residential and employment development and theme-based policies.

The consultation period runs from Tuesday 6th February to noon on Tuesday 2nd April 2024. 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

Once the form has been completed, please send to planningpolicy@testvalley.gov.uk below by **noon on Tuesday 2nd April 2024**.

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: 01264 368000

Website: www.testvalley.gov.uk/localplan2040

Email: planningpolicy@testvalley.gov.uk

Part A: Your Details

Please fill in all boxes marked with an *

Title* Mr/Mrs/Miss/Ms/Dr/Other (please state)	Ms	First Name*	Bridget
Surname*	Fox		
Organisation* (If responding on behalf of an organisation)	Woodland Trust		

Please provide your email address below:

Email Address*	
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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 until the Local Plan 2040 is adopted and the Judicial Review period has closed and will then be securely destroyed.

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

Part B: Your Comments

Please use the boxes below to state your comments. This includes one box for general comments and another for specific comments related to an area of the Local Plan.

Insert any general comments you may have that do not relate to a specific paragraph number or policy in the general comments box below.

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
<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 work to achieve this by restoring and improving woodland biodiversity and increasing people's understanding and enjoyment of woods and trees.</p> <p>We own or manage over 1,275 sites across the UK, including part of Valley Park Woodlands in Test Valley. In total our sites cover over 23,580 hectares nationwide, 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 value that they deliver for climate, nature, and society.</p> <p>We welcome the opportunity to comment on the draft Test Valley Local Plan.</p>

For specific comments, please make it clear which paragraph, policy or matter your comments relate to where possible. Please use the box below.

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.

Paragraph Ref	Specific Comments
BIO1	<p>Conservation and Enhancement of Biodiversity and Geological Interest.</p> <p>We welcome the inclusion of <i>vi. Irreplaceable habitats including ancient woodlands and ancient and veteran trees;</i> <i>vii. Trees, woodlands and hedgerows;</i></p> <p>However, we feel the wording in a), b) and c) is insufficiently robust as it applies to irreplaceable habitats, where the NPPF 186c mandates that development should not be allowed except in wholly exceptional circumstances (wording that is already reflected in para 5.269 and policy BIO5).</p> <p>We therefore propose strengthening this by adding a wording as follows: <i>Development that is likely to result in the loss, deterioration, or harm to irreplaceable habitats, either directly or indirectly, will not be permitted except in wholly exceptional circumstances.</i></p> <p><i>Development that is likely to result in the loss, deterioration or harm to other habitats or species of importance to biodiversity or geological conservation interests, either directly or indirectly, will not be permitted unless:....</i></p> <p>We welcome the inclusion of point viii on protecting nature networks.</p>

Paragraph Ref	Specific Comments
BIO3	<p>Biodiversity Net Gain</p> <p>We note that the policy as drafted complies with the statutory requirement to deliver at least a 10% measurable net gain over 30 years.</p> <p>We support setting a greater than 10% target for net gain where appropriate. By setting a more ambitious target, the Local Plan increases the chances that an average net gain of at least 10% will be delivered across the Plan area, given the possibility that some sites may not be able to deliver net gain within the District or that initiatives intended to deliver such gain may fall short in practice.</p> <p>Other adopted local plans have set higher targets. For example,</p> <p>Guildford: <i>P7 12) Qualifying development proposals submitted after the national scheme comes into effect are required to achieve a biodiversity net gain of at least 20 per cent, or the advised national minimum amount, whichever is greater, measured using the national biodiversity net gain calculation methodology.</i></p> <p>Worthing: <i>DM18 h) New developments (excluding change of use and householder) should provide a minimum of 10% net gain for biodiversity - where possible this should be onsite. Where it is achievable, a 20%+ onsite net gain is encouraged and is required for development on previously developed sites.</i></p>

	We would also encourage considering development of a local metric for more urban/brownfield sites, such as the London Urban Greening Factor, because such sites may already have a very low level of biodiversity and therefore a percentage increase may not in practice deliver significant enhancements.
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Paragraph Ref	Specific Comments
BIO5	<p>Trees and Hedgerows</p> <p>We welcome the inclusion of a specific policy for trees and hedgerows. We feel this could be strengthened and better reflect NPPF para 136 if the policy were to be reworded to say: <i>Development will not be permitted where the proposed development takes account of trees, both above and below ground, (including on-site and off-site trees) unless;</i></p> <p>We recommend reflecting the aim set in para 5.266 for increased tree canopy cover as part of this policy. In line with this, we recommend rewording a): <i>a) it provides for suitable new tree, woodland and hedgerow planting and future growth, to support an increase in overall tree cover</i></p> <p>We note that guidance on buffer zones for ancient woodland is given in footnote 125 within Appendix 3. While we are pleased to see that such guidance is given, we recommend elevating it to be more integrated with policy BIO5 b) <i>b) it avoids the loss or deterioration of irreplaceable habitats (such as ancient woodland, ancient semi-natural woodland, and ancient or veteran trees), unless there are wholly exceptional reasons; and applies suitable buffers if located within 50m of ancient woodland.</i></p> <p>Alternatively this could be added in the accompanying text e.g. para 5.269.</p> <p>We recommend rewording e) to better comply with requirements for biodiversity net gain <i>e) where it is demonstrated that any tree or hedgerow losses are unavoidable, the development provides for greater than 1:1 replacement and retention, with UK sourced stock from native species, planted onsite or in a suitable local location.</i></p> <p>Specifying native species from UK sourced & grown tree stock will help address threats of pests & disease and help boost resilience and biosecurity as well as supporting the domestic green economy and reducing the carbon footprint of the supply chain.</p>

Paragraph Ref	Specific Comments
NA2	<p>Delivering High Quality Development in Andover Town Centre</p> <p>We support the requirement in e) for the creation of appropriate, sustainable new green spaces or green infrastructure and biodiversity throughout the town centre.</p>

Paragraph Ref	Specific Comments
NA4	<p>Land South of London Road, Picket Twenty</p> <p>Should this site be allocated, we support the requirement in a) <i>Provision of green space in the east of the site to extend Harewood Common.</i></p> <p>Areas to the west of the site (Walworth Business Site and Picket Twenty) have some of the lowest tree cover in the district, as seen on the UK Tree Equity map https://uk.treeequityscore.org. We therefore urge setting a specific target for tree cover as part of this policy, to be pursued through the retention of important trees, appropriate replacement of trees lost through development, ageing or disease and by new planting to support green infrastructure.</p>

Paragraph Ref	Specific Comments
NA5	<p>Land at Manor Farm, North Andover</p> <p>We note the requirement in c) <i>An appropriate buffer along the east of the site adjacent to Knights Enham.</i></p> <p>Should this site be allocated, we request an additional requirement for <i>An appropriate buffer for the ancient woodland to the north of the site at Little Belgrove Copse.</i></p>

Paragraph Ref	Specific Comments
NA8	<p>Land to the South East of Ludgershall</p> <p>Should this site be allocated, we support the requirement b) <i>An ecological buffer to the Willis Wood ancient woodland</i></p>

Paragraph Ref	Specific Comments
SA2	<p>Delivering High Quality Development in Romsey Town Centre</p> <p>We support the requirement in e) for the creation of appropriate, sustainable new green spaces or green infrastructure and biodiversity within the vicinity of the town centre.</p>

Paragraph Ref	Specific Comments
SA4	<p>Land South of Ganger Farm, Romsey</p> <p>Should this site be allocated, we support the requirement in a) <i>An appropriate buffer to the ancient woodland located on the south and south eastern boundary.</i></p>

Paragraph Ref	Specific Comments
SA6	<p>Land at Velmore Farm</p> <p>We object to the allocation of this site for development where ancient woodland is at risk of loss or harm. We are concerned that the current policy requirements in SA6 make no mention of protection and buffering of the areas of ancient woodland at Austins Copse and Spring Copse to the south and west of the site, parts of larger areas of priority habitat (deciduous woodland).</p> <p>We ask that either this site is removed from the plan, or that the site boundaries are redrawn to exclude the ancient woodland. Whether the ancient woodland is within or outside the development site, we recommend a precautionary buffer of 50m unless it can be demonstrated that a smaller buffer would suffice: this buffer can be used for natural woodland regeneration, contributing to biodiversity net gain and/or providing accessible natural green space for residents.</p> <p>Further guidance is available in the Woodland Trust's Planners Manual https://www.woodlandtrust.org.uk/publications/2019/06/planners-manual-for-ancient-woodland/</p>

Paragraph Ref	Specific Comments
SA7	<p>Land at King Edward Park, Ampfield</p> <p>We object to the allocation of this site for development where ancient woodland is at risk of loss or harm. We ask that either this site is removed from the plan, or that the site boundaries are redrawn to exclude the ancient woodland.</p> <p>We note the requirement in a) for a buffer to the Trodds Copse Site of Special Scientific Interest (SSSI) and Ancient Woodland</p> <p>Whether the ancient woodland is within or outside the development site, we recommend a precautionary buffer of 50m unless it can be demonstrated that a smaller buffer would suffice: this buffer can be used for natural woodland regeneration, contributing to biodiversity net gain and/or providing accessible natural green space for residents.</p> <p>Further guidance is available in the Woodland Trust's Planners Manual https://www.woodlandtrust.org.uk/publications/2019/06/planners-manual-for-ancient-woodland/</p>

Paragraph Ref	Specific Comments
SA12	<p>Kennels Farm, University of Southampton Science Park, Chilworth</p> <p>We object to the allocation of this site for development where ancient woodland is at risk of loss or harm. We ask that either this site is removed from the plan, or that the site boundaries are redrawn to make explicit the required buffer for the ancient woodland.</p> <p>We note the requirement in d) for buffer to Long Copse Ancient Woodland and Site of Importance to Nature Conservation.</p> <p>Whether the ancient woodland is within or outside the development site, we recommend a precautionary buffer of 50m unless it can be demonstrated that a smaller buffer would suffice: this buffer can be used for natural woodland regeneration, contributing to biodiversity net gain and/or providing accessible natural green space for residents.</p> <p>Further guidance is available in the Woodland Trust's Planners Manual https://www.woodlandtrust.org.uk/publications/2019/06/planners-manual-for-ancient-woodland/</p>

Paragraph Ref	Specific Comments
SA16	<p>Forest Park</p> <p>We support the aspiration for a Forest Park, and the potential to protect, restore and re-connect areas of ancient woodland.</p>

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 reference number when contacting the Council about the Local Plan 2040. If you have an agent acting on your behalf, correspondence will be sent directly to your agent.

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