

From: [REDACTED]
To: [Planning Policy](#)
Subject: Response to Draft Local Plan 2040
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Dear Planning Department,

I, Carol Bartholomew, am submitting a response to the Draft Local Plan 2040, on behalf of Test Valley Friends of the Earth. Email: [REDACTED]

Draft Local Plan 2040 response on behalf of Test Valley Friends of the Earth.

One of the main purposes of the Local Plan is to achieve net zero carbon emissions by 2050, inline with the Climate Change Act, by reducing current and future greenhouse gas emissions and increasing energy production from renewable sources. The natural environment and the protection and improvement of habitat for our dwindling wildlife is of equal importance.

Renewable Energy

The map showing areas suitable for wind turbines and size of turbine suitable for that location, is welcome. The Local Plan does not show how on shore wind turbines are going to be encouraged. Although Test Valley now has numerous solar farms a more rounded energy production to cover night time and rainy days, it needs to encourage wind turbines.

It is not clear how other technologies such as energy from waste, anaerobic digestion installations and recycling plants will be guided towards or away from suitable or sensitive locations.

Energy storage needs to be encouraged.

Housing

The Draft Local Plan states in section 3.4 ‘High quality design’. How is this defined?

The wording isn’t strong enough. The sentence 2.12.6 ‘The costs to achieve net zero on buildings will be kept under review as construction costs are likely to reduce over time as technologies develop and developers invest more in net zero solutions.’ is very wishy washy. Unless all new build is built to net zero standards there is no possibility of reaching net zero. These are the houses of 2050.

Zero Carbon Urgency: Don’t wait for the acceptance of the Local Plan 2040 to ensure those houses already planned for are close to zero Carbon emissions. No new houses should be built which immediately need retrofitting. This is essential for all buildings, not just housing. Net Zero needs to be a necessity now as houses in the 2020’s are the housing stock for 2050 and beyond. Retrofit is always much more costly than building to the higher standard. It is not acceptable for a new build house to need retrofitting as soon as the building is sold.

The Local Plan does not state how renewable energy could be incorporated into a new development such as power from a wind turbine. Building to extremely high energy efficient standards, using the Passivhaus standard or similar. The advantage of these designs are the focus on ventilation whilst preventing heat loss.

Require the installation of renewable energy into new build such as photovoltaic in combination with heat pumps within private and public sector developments. If new technologies arise these should be evaluated as to how they reduce carbon emissions. For example, if hydrogen is used as a fuel, it is only carbon free if it has been produced using renewable energy.

Allow, via planning policy, new build housing to use new sustainable techniques and not be stopped by planning regulations which say it has to fit into the street scene of previous decades.

Ensure verification of energy efficiency performance on completion: Passivhaus designs have

to be built to a very high standard for the efficiency for the design to work.

Ventilation: We are already living through hotter summers due to Climate Change. Ventilation within the new buildings will reduce the need for electric fans and air conditioning which would add to the carbon emissions for the building. Ventilation is essential, as well as shading and positioning of windows. Living and working in overheated buildings causes a strain on people's health.

Low carbon construction materials: Housing has a large amount of carbon emitted in the production of the building material. Encourage use of materials lower in carbon which meet current regulations. (Preferably over and above current regulations following the catastrophe of adding insulation material to Grenfell Tower). Ensure these low carbon materials are covered in planning policy and can be encouraged/promoted.

Renovation: There is now research to say it is often more carbon efficient to reuse and renovate older buildings rather than knock down and rebuild due to the high carbon production of newbuild.

Give advice for those doing renovations, including listed buildings, which allow these buildings to become more energy efficient.

Transport & Travel

Car Use: Use of the car is high in Test Valley, higher than most other parts of Hampshire adding to the carbon emissions making Test Valley one of the boroughs with the highest emissions in the country.

Cycling, Walking and Public Transport: The Draft Local Plan explains the requirement for cycle and pedestrian routes on new developments, but it doesn't consider how these would tie in with access to nearby work and education by making the cycleways safe all the way, or to work, college and University outside of the borough i.e. Basingstoke, Salisbury, Winchester, and Southampton. There needs to be joined up thinking with other Boroughs and District Councils on transport plans to reduce car journeys.

Key services: such as shops and schools and pharmacies need to be on or close to new developments.

Charging points: Ensure new houses and flats have electric vehicle charging points for all homes and suitable storage and charging for mobility scooters.

Rural settlements: have pretty much been left out when allocating housing yet those villages with schools and shops and communities could benefit from more residents. If major rural communities were linked to Andover, Romsey, and Winchester and the health services via regular bus routes this could fill in the missing transport links for a large part of the borough. Currently it is essential to have a car in a rural community as isolation and lack of services have a huge impact on elderly, disabled and those on a low income.

The natural environment, habitats, and biodiversity

The impact of climate change and loss of species have hit Test Valley. Habitats for the range of species across the ecosystems are greatly reduced across the whole of the UK. Birds thought of as prolific are now on the endangered list.

One of the main goals of the Local Plan must be to ensure nature restoration goals are high level in all planning.

Aspects of Legislation referenced in the Local Plan. The most relevant being:

2.4 The NPPF National Planning Policy Framework definition of sustainable development – development that meets the needs of the present without compromising the ability of future generations.

2.14 The Environment Act 2021 – The Local Plan must address water resources, air quality biodiversity and nature recovery.

2.45 The Environment Act 2021 requires new developments both minimise any impacts on biodiversity and habitat and ensures biodiversity net gains are delivered.

This legislation is key for designing landscaping on developments, open spaces, and leisure facilities as well as in nature reserves and protected areas of countryside. It is also key to all the streams, rivers and lakes and surrounding areas.

Every square meter needs to be considered. Current mown areas could be reduced to add many more trees, hedgerows and areas of habitat to encourage local species of insects, birds, mammals, and reptiles. Ensure existing trees are properly protected, in order to store carbon, support nature, aid flood protection and deliver mental health benefits while spending time in nature.

Protect existing local green spaces and link these by making wildlife corridors which can include gardens if they have suitable planting and access for wildlife. Existing hedgerows and trees, as well as being protected, should have a buffer space of the natural environment around them when incorporated into a new development. Include fruit, berry, and nut trees suitable for birds and humans. Incorporate a nature and ecosystem restoration plan to reverse and restore habitats, species, and ecosystem quality and function.

Urge developers to plant road verges to increase biodiversity and draw down carbon and increased planting of wildflowers.

Leisure areas also need areas of shade for humans and wildlife, both from trees and built structures.

Water

River Test and all its tributaries are at risk of a collapse of their ecosystems.

The River Test and the surrounding beautiful countryside has always been the heart of Test Valley's unique and beautiful countryside. The chalk streams being the lifeblood of the borough as well as the tourist industry. However recent headline news has focused on the River Test being polluted and slowly killed by sewage and a number of farming and climate factors.

Our rare chalk stream rivers are in fact doing the hard work for all of Test Valley. The aquifers that feed the Anton and the Test are drawn on for our water supply meaning the river flows are unnaturally low. The under capacity of our sewage works has shown to be overwhelmed in wet weather when the Test is receiving water not fully treated. The indicator species that show the health of the river are in decline. With frequent episodes of drought and flood the rivers are having to cope with an onslaught of extreme conditions putting the life in the river, and the birds and mammals dependent on the river for food, at risk. The river water is on a knife edge of being out of balance with nitrates and phosphates as well as discharges of sewage which have made headline news in January, February and March 2024. The River Anton, Pill Hill Brook and the River Test are much too close to a collapse in the ecosystems and there is no room for mistakes.

The supporting Water Cycle Report clearly highlights the risks. It has put forward solutions including those already being worked on by Southern Water, but those solutions need to be in place before more houses are built. For both the water supply and the sewage treatment capacity for all houses and all weathers.

Also, in times of high rainfall runoff from paved over gardens and driveways add to water being treated in the treatment works. The priority needs to be for water to soak into the ground, in gardens and green areas. Driveways and concreted gardens need drainage into the soil, not the road and the drains. Separate runoff systems need to be incorporated into new developments so that waste water does not overload the sewage treatment process. This is stated in the Local Plan but it needs to raise more awareness for residents making decisions in their own gardens.

The Water Cycle Report included in the documents supporting the Local Plan is essential to planning. The Local Plan delivery is very, very dependent on the water supply and treatment. TVBC must prioritise not killing the river at the expense of more development. There needs to be an understanding of the changing climate and the balance to maintain a water supply for the population of Test Valley whilst maintaining river flow.

Development must not progress faster than the provision of water supply and sewage treatment. On reading the Water Cycle report it seems essential that development does not progress faster than the provision of drinking water and the capacity of the sewage systems. The sewage system is already overloaded as monitoring the River Test has disclosed. The River Anton, Pill Hill Brook, Wallop Brook, and River Test are rare chalk streams and can only support wildlife if the water is not polluted by a range of sources, notably farming and sewage, and pollution from industry.

Water Supply: Residents and industries in the Test Valley need to be made aware we live in an area of low water supply and that measures to reduce the amount used per person per day are explained.

The proposed reservoir at Havant Thicket isn't built yet. As the Local Plan relies on Havant Thicket reservoir to supply water to Andover this needs to be up and running before new developments are built. Likewise with sewage. The Fullerton sewage works are not treating the wastewater adequately due to a range of problems, particularly in wet weather. In March 2024 the Environment Agency reported thousands of breaches by Southern Water where thousands of hours of untreated water was discharged into the rivers and the sea.

Residents need to know they are living in an area with a shortage of drinking water and adaptations encouraged such as water saving fittings and being advised on ways to save water.

The future is unpredictable.

Climate Change is running ahead of the building of new infrastructure. There is no back up infrastructure. Should there not be an additional sewage treatment plant? Test Valley is completely reliant on Southern Water doing an excellent job and being truthful and not hiding their problems from the public. Current news reveals the water companies have not been investing at the speed required to keep our rivers in good health.

Waste water from all the new developments from the borders of Ludgershall, Andover and Romsey will need new or much improved treatment works. It's also unclear how runoff from roads will be collected separately from waste water and if it is clean enough to enter a stream **or river** or whether it will be diverted to a reed bed treatment or other natural treatments or an engineered facility.

The extremes of rain and drought and changed weather patterns have become unpredictable. The council needs to encourage all measures to reduce flood water across the borough, not just in new developments. Parts of the borough prone to flooding will need additional work to prevent damage to properties and the natural environment.

(Note: there is an error in wording in the Draft Local Plan regarding chalk stream rivers. A chalk stream river is a category of river, but at one point the word 'stream' has been omitted.)

Carol Bartholomew, joint coordinator
Test Valley Friends of the Earth

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