

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)	Mrs	First Name*	Alexandra
Surname*	Webb		
Organisation* (If responding on behalf of an organisation)	Southern Planning Practice Ltd		

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:

Yelspa Ltd

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>Please see submitted representations.</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
	<p>Please see submitted representations.</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.

Representations on the Draft Test Valley Borough Local Plan 2040 Regulation 18 Stage 2

These representations have been prepared by Southern Planning Practice Ltd on behalf of Yelspa Ltd which owns and runs a Biodigester Plant on land at Faulkners Down Farm, Picket Piece at in response to the current consultation on the Draft Local Plan 2040 (hereinafter referred to as the DLP).

Chapter 5: Theme Based Policies

Policy CL1: Countering Climate Change

This general and overarching policy is **supported**, in particular criteria c) which reads as follows:

*“c) Development, including associated facilities and infrastructure, is **designed to be adaptable to changing needs**, technologies, and a changing climate”;*

The policy wording also states that:

*“Appropriate opportunities have been taken to **use or reuse buildings and land efficiently**, minimise the use and promote the sustainable use of resources and promote a circular economy”.*

There should be stronger wording in this policy to demonstrate a presumption in favour of allowing the principle of such development that counters climate change, unless there are significant adverse impacts.

To increase the potential to reduce emissions by 2050, further changes are required to other relevant draft local plan policies in this chapter, namely;

Policy CL5: Renewable and Low Carbon Energy

This draft policy supports the delivery of renewable and low carbon energy and storage along with the associated infrastructure.

There are many sites that have been planned for the long term, not just on the basis of a 25-year licence. There should be greater support to sustain these sites, given the level of investment and potential benefit for the climate in the future in accordance with criteria a) paragraph 160 of the NPPF.

In terms of the de-commissioning of sites, it seems onerous to have to consider traffic implications, when it would seem obvious the traffic generation would be less if the activity or land use were to cease. The impact on local amenity would also be reduced. There is little in the policy commentary to explain why criteria g) should also comply to decommissioning.

The requirement for restoration and re-instatement of sites following the cease of operations in the second paragraph of the policy wording is considered to be unnecessary. The need to re-instate any lost habitats is appreciated and acknowledged as of great importance.

Paragraph 157 of the NPPF sets out how the planning system should “*encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure*”. The potential for re-use and re-development for other forms of renewable and low carbon energy forms should therefore be more strongly encouraged and supported through the wording of draft policy CL5. This would result in more efficient use of land and reduce the need to look for other alternative sites for this type of provision.

There is little consideration for the existing sites within the Borough that currently deliver renewable and low carbon energy in the policy wording. This is likely due to the lack of detailed assessment of the existing provision and potential development opportunities of those sites in The Test Valley Renewable and Low Carbon Energy Study (2020). significant weight should be given to the benefits of utilising an established site in accordance with criteria c) paragraph 163 in the NPPF. Proposals for the repowering and life-extension of all types of for renewable and low carbon development should be included, not just ‘wind energy proposals’ as listed under criteria h) of policy CL5.

Given renewable and low carbon technology is constantly evolving at a rapid pace, the potential for amendments, revisions and extensions to existing schemes should be considered and strongly supported in policy.

Summary

There should be greater emphasis on supporting development that is ancillary to, an expansion or re-use of existing sites that generate renewable and low carbon energy. This will maximises the potential for suitable development, and their future re-powering and life extension of existing sources of renewable and low carbon energy sources across the Borough.

SPP
March 2024