



Test and Itchen Association Ltd



Planning Policy and Economic Development,
Test Valley Borough Council,
Beech Hurst,
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2 April 2024

TVBC Local Plan 2040 Regulation 18 Stage 2 Consultation Comments

Introduction. I am writing in my capacity as the Company Secretary and Executive Director of the Test and Itchen Association Ltd; the pre-eminent organisation representing over 400 riparian owners, keepers and members who seek to conserve and manage the chalk streams of Hampshire.

General Comments for the basis of Objection. The Test and Itchen Association (T&IA) object to the scale of the proposed local development on the grounds that the aggregated impacts of the Local Plan (LP) and those of other surrounding LPs adversely impacts on the Rivers Test SSSI and the River Itchen SSSI/SAC and the major tributaries to these rivers in the TIC. These globally rare and fragile chalk streams need protecting; this LP does not do so, as the scale and speed of planned housing delivery overmatches practical mitigations to protect the rivers and surrounding environment.

Scale of the Impact In addition to the 11,000 housing demand planned in TVBC Local Plan 2040, there are an additional 59,180¹ houses projected in a very similar time frame from neighbouring planning authorities, all of whom will be drawing water from the over abstracted rivers in the TIC and the majority of whom will be requiring wastewater services from Southern Water (SW).

¹ paragraph 5.61 - In combination effects – HRA Test Valley Local Plan 2040 dated Jan 2024.

SW Ability to Provide Potable Water and Wastewater Services. Currently SW are failing in their obligations to provide potable water without affecting the environment. It is well understood that the rivers in the TIC are over abstracted, and that SW is constantly polluting the rivers. The Environment Agency (EA) has recently released the 2023 SW Storm Overflow data for SW and this makes for disturbing reading. In the TIC they discharged over 15,400 hrs², a figure 15 times that reflected in the Test Valley Water Cycle Study³. SW PR 24 plans show no sign of significant further investment in their Asset Management Plans (AMP) going forward until well beyond 2030 to reduce this pollution from wastewater treatment works (WWTW) combined storm overflows (CSO). SW investment to date in the Infiltration Reduction Plans (IRP), the sealing of pipes to prevent ingress of groundwater being the principal mitigation, has been very modest. SW under their 2018 legally binding Section 20 obligations to reduce abstraction on the Test and Itchen by 2027 are 'obligated to use all best endeavours' to deliver alternative water resources by 2027. They are not on target to provide this and will not do so until at least 2030 if not later; they are currently negotiating with the EA their continuing obligations under the Section 20 order. The level of housing demand in this LP and neighbouring LPs is highly likely to over match SW's Water Resource Management Plan (WRMP) and their concomitant Drainage and Wastewater Management Plan (DWWMP) in the early parts of the LP. The LP places too much reliance on SW to deliver on these plans. If past and current performance is an indicator of SW's future ability to deliver a fit for purpose WRMP and DWWMP, then confidence in the LP being realistic and robust in its assumptions base is also low. The LP therefore requires further revision with regards to the matters in this paragraph.

Interpretation of the National Planning Policy Framework (NPPF). The LP was prepared before the National Planning Framework (NPPF) changes were announced on the 19th December 2023 which was launched together with a Ministerial statement by the Secretary of State (SoS). The revised NPPF now states that the standard method should be treated as "an advisory starting-point for establishing a housing requirement for the area". The LP appears to have used the standard approach of trying to meet hitherto nationally derived housing targets and not an objectively assessed needs approach considering the need to protect the environment as stated at paragraph 11. (b) i. (footnote 7) in the NPPF, which clearly requires the LP to protect SSSI and SAC as they represent a strong reason to restrict the overall scale, type and distribution of development in the LP. As recognised in the LP (paragraph 2.48) the challenge of pollution places constraints on the development in the LP but there does not appear to

² DEFRA EDM 2023 Storm Overflow Annual Return dated 27 March 2024. [Link](#)

³

PC5245-RHD-XX-XX-RP-X-
0001 dated 5 Feb 2024.

be due weight given to ensure that the scale of development can be matched by the need to improve the provision of water and the effective control of pollution in order to protect the SSSI and SAC rivers in the LP.

Conclusions. We assert that there should be a revision of the LP with a focus on matching the planned development trajectory with the need to stop adversely affecting the environment. This will require a revision of the planned numbers of houses at the trajectory planned. We would contend that this need to be matched to such times as the LP can assure that:

- The EA consider SW have a robust, funded and implementable DWWMP that brings river pollution from their CSOs under control.
- The EA consider that SW have a WRMP that brings abstraction from our rivers in the TIC back into balance with the need to protect them from adverse flow rates and that meet their obligations under the Section 20 order previously referred to.

Signed electronically

Mr Paul Vignaux
Executive Director

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