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Planning Policy
Test Valley Borough Council
Beech Hurst
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Dear Planning Policy Team,

RE: DRAFT Local Plan 2042 - Revised Regulation 18 (2025) Public Consultation

Hampshire and Isle of Wight Wildlife Trust take the position that new mandatory housing targets for Test Valley are wholly inappropriate and fundamentally unsustainable, failing to adequately consider material environmental thresholds. A new target of 15,878 homes over the next 17 years represents a 78% increase on the previous target. This target does not account for resource limits, such as water supply, which face increasing pressures from over-abstraction, climate change and ageing infrastructure. Therefore, in our view, site allocations as outlined in the Revised Regulation 18 Local Plan does not reflect best practice in plan-making, failing to deliver meaningful protections and enhancements to nature across the Borough.

The Revised Regulation 18 document focuses solely on those matters related to an increase in housing need. Despite supporting evidence (i.e. Habitats Regulations Assessment, & Interim Sustainability Appraisal), this document does not go far enough to consider the much-needed protection, mitigation and conservation measures necessary to restore the natural environment, whilst delivering housing numbers required. Housing need does not exist in a vacuum and, therefore, the document cannot be considered in isolation of other constraints, including the biodiversity and climate crises. It is wholly unfeasible to consult on housing need and additional site allocation alone. At a minimum, all housing allocations must be in alignment with the forthcoming Hampshire Local Nature Recovery Strategy, as well as legally binding Environment Act targets to protect 30% of land and sea for nature by 2030.

Site Options

The proposed strategic housing allocation for approximately 1070 dwellings at Halterworth, East Romsey is situated immediately adjacent to Emer Bog and Baddesley

Common Nature Reserve, which is a site of ecological importance, designated as an SSSI and SAC. The close proximity of this development, coupled with a direct road link to the reserve via Highwood Lane, presents a substantial risk of increased recreational pressure on these sensitive habitats. This is likely to lead to greater levels of wildlife disturbance, habitat degradation and heightened management demands on the Trust, ultimately resulting in increased financial and operational burdens. It should be noted that this site is of considerable hydrological and chemical sensitivity. TVBC & HIWWT commissioned the '*EMER BOG AND BADDESLEY COMMON Hydrological Desk Study, R Allen 2016*', to identify critical and priority buffer zones for the protected site, as a planning note for development control. This includes land at Warren Farm, which is within the priority catchment.

Similarly, the proposed allocation for approximately 100 dwellings on land at Danebury School, Stockbridge lies in close proximity to Stockbridge Marsh (SSSI) and the River Test (SSSI), a rare and vulnerable chalk stream habitat. These internationally important habitats are likely to face intensified recreational pressures, further threatening the ecological integrity of the sites.

These concerns are not confined to the two proposed sites discussed above. The 78% increase in housing targets across the Borough collectively contributes to an escalation of recreational demand on the local natural environment. Sites such as Flexford Nature Reserve and Fishlake Meadows Nature Reserve, which already serve as key habitats for wildlife and recreational areas for local communities, are at risk of experiencing significant cumulative impacts. Without stringent protections and careful mitigation, these pressures could result in the degradation of these habitats and diminished biodiversity in the long-term, reducing the capacity for these sites to deliver both environmental and community benefits.

We note the appraisal of site options in the '*Sustainability Appraisal (SA) of the emerging Test Valley Local Plan 2042, Interim SA Report, June 2025*'. As a guiding evidence for the draft Local Plan, the appraisals appear to be subjective and miss key information that should be considered, such as detailed above. Assessment predictions of 'moderate, or uncertain negative effect' for Biodiversity & Water respectively do not reflect the critical thresholds for important areas for biodiversity or acutely vulnerable assets such as the River Test.

Water

As mentioned above, the Trust has concerns around the state of water infrastructure in the Borough, particularly in rural villages, where tankers are frequently brought in to manage lack of capacity & combined sewage overflow breaches, such as in Chilbolton and Lockerley. In 2024, Chilbolton Waste Water Treatment Works spilt effluent into the River Test 17 times, for a total of 175 hours. Chilbolton, despite these existing issues

with network capacity, has been allocated approximately 65 dwellings on land to the north east of Drove Road. Lockerley has been allocated approximately 50 dwellings on land West of Holbury Lane. The Trust questions the confidence of the Council in the capacity of the water network to provide services to the sites allocated, whilst maintaining ensuring utility compliance with licenses. These developments place the River Test, a rare and designated chalk stream, and its tributaries at risk.

Drought conditions are also intensifying the impacts of abstraction on the River Test and its tributaries. This year, Southern Water has sought a Drought Order to amend its abstraction license from a Total Test Flow (TTF) threshold of 335 megalitres per day, to just 265 megalitres per day. With climate change increasing both the frequency and severity of drought events, the Local Plan must go beyond existing Water Use and Management policy (CL4) when evaluating a proposed development. The Council should adopt a requirement for water neutrality in all new developments, taking note of the approach adopted by West Sussex County Council. Achieving water neutrality is essential to safeguard and replenish the fragile chalk aquifer that sustains the flow of the Test. Without such a measure, Atlantic Salmon on the Test, which are already at less than half of the conservation limit, are at risk of disappearing forever.

Given the projected changes with climate change, and the increased frequency of severe flood events, as well as low flow, droughts, we are curious by the sustainability assessments prediction of 'neutral effect' for Flood Risk.

With the Council recently recognising the Rights of Rivers in Test Valley, river rights, derived from the Universal Declaration of River Rights, should be embedded into Local Plan policies to deliver stronger protections to the Test.

The above advice is given based on the information made available at this time and may change should further or amended details be submitted. We trust that you will find our comments helpful and if you wish to discuss these matters further, please do not hesitate to do so. I also ask that you keep the Trust informed of the progress of the Local Plan.

Best regards,

Lorna Selby

Policy & Advocacy Officer

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