

**D6 - Brownfield development and making best use of Land**

- Support - 21
- Neither support of object - 11
- Object - 22

The changes to the supporting text and the Local Plan policies have not only been informed by the responses to the Regulation 18 consultation but they have also taken on board any additional feedback that has come out of discussions/meetings with statutory consultees and members in order to improve the clarity and understanding of the contents of the Local Plan.

<b>Comments in support of D6 - Brownfield development and making best use of Land</b>		
<b>Respondent number</b>	<b>Comment</b>	<b>Officer comment</b>
ANON- KSAR- NKGG-R	Brownfield sites need to be exhausted before green field sites are developed and when doing so, MUST be done in line with the countryside in which they are built	Comments are noted – the Council can only use land that is made available to them during the Call for Sites process as part of the Local Plan review. The Council cannot meet the housing requirements by using brownfield land alone, and therefore, greenfield land is required. It is not always the case that brownfield land meets the development strategy of the district or is in an appropriate location to do so. Brownfield land is the preferred method for delivering development, but it is not always achievable; brownfield land should not automatically be considered

		<p>over greenfield land by virtue of its status and should always be considered and developed on its planning merit. Policies D1 and D4 allow for the control and design of development and how development should respond to the location.</p>
<p>ANON-KSAR-NKH3-5</p> <p><u>And</u></p> <p>ANON-KSAR-NKPC-W</p>	<p>I fully support prioritising brownfield sites over greenfield sites. Greenfield sites should be developed as a last resort</p> <p>I am concerned that property developers want to build on greenfield sites for profit and not for the benefit of the community. Developers should be penalised for not building the full quota of properties where planning has already been given.</p> <p>Developments on existing sports facilities such as South Winchester Golf Club shouldn't be permitted and a ban of developers applying for planning permissions should be implemented. Developers should not be allowed to buy up existing well used facilities then constantly lobby to develop it.</p>	<p>Comments are noted – the Council can only use land that is made available to them during the Call for Sites process as part of the Local Plan review. The Council cannot meet the housing requirements by using brownfield land alone, and therefore, greenfield land is required. It is not always the case that brownfield land meets the development strategy of the district or is in an appropriate location to do so. Brownfield land is the preferred method for delivering development, but it is not always achievable; brownfield land should not automatically be considered over greenfield land by virtue of its status and should always be considered and developed on its planning merit.</p> <p>Property developers develop land for profit; it is a business and expecting a developer not to do so, or preventing a developer from doing so would result in</p>

		<p>less development coming forward. It would be rare for a developer to not develop land to its full potential when permission has been granted. This contradicts the previous comment regarding developers developing for profit – there would be more profit generated for building to the full potential. Furthermore, it is beyond the remit of the Local Plan review to penalise a developer for this reason, and also to ban a developer from land purchase.</p> <p>Local Plan policy NE3 protects open space, sports or recreation facility from development unless the development would meet the objectives set out in the policy.</p>
<p>ANON- KSAR- NKPC-W</p>	<p><del>I fully support prioritising brownfield sites for development and greenfield sites should be developed as the last resort. In my opinion property developers want to build on greenfield sites for profit and not for benefit of the community. Developers should be penalised for not building the full quota of properties where planning has already been given. The hoarding of land by developers should be prevented.</del></p> <p><del>Developers shouldn't be allowed to lobby for building on existing sport facilities such as South Winchester Golf Club. In this case planning permission should be rejected as there are enough sites allocated for house building in Winchester. Developers should not be allowed to buy</del></p>	<p>Noted</p>

	<del>up land (especially leisure facilities such like existing golf courses) and then constantly lobby to develop it.</del>	
ANON-KSAR-N8EY-N	Whilst agreeing the policy in general I do suggest it should be reinforced by ensuring brownfield sites are used before other sites are permitted to be developed.	Comments are noted – the Council can only use land that is made available to them during the Call for Sites process as part of the Local Plan review. The Council cannot meet the housing requirements by using brownfield land alone, and therefore, greenfield land is required. It is not always the case that brownfield land meets the development strategy of the district or is in an appropriate location to do so. Brownfield land is the preferred method for delivering development, but it is not always achievable; brownfield land should not automatically be considered over greenfield land by virtue of its status and should always be considered and developed on its planning merit.
ANON-KSAR-N8N6-U	To include the use of all available accommodation that lies empty e.g. flats over shops, Unused garage areas e.g.at Hiltingbury Before ANY green fields are sacrificed every space already concreted over should be utilised.	Comments are noted – the Council can only use land that is made available to them during the Call for Sites process as part of the Local Plan review. The Council cannot meet the housing requirements by using brownfield land alone, and therefore, greenfield land is required. It is not always the case that

		<p>brownfield land meets the development strategy of the district or is in an appropriate location to do so. Brownfield land is the preferred method for delivering development, but it is not always achievable; brownfield land should not automatically be considered over greenfield land by virtue of its status and should always be considered and developed on its planning merit.</p> <p>Existing accommodation that lies empty is a separate issue to plan-making and cannot be addressed in the Local Plan; the Local Plan cannot enforce a buildings usage that is in private ownership. The use of existing properties would not contribute to meeting the Council's housing need as this would not generate an additional dwelling.</p>
ANON-KSAR-N81Y-1	It is welcomed that the policy prioritises development of brownfield land and that there is an expectation for higher densities on such land within the context of a future high-quality well-designed places.	Support is noted.
BHLF-KSAR-N8T8-3 Olivers Battery	OBPC strongly supports the use of previously developed land (brownfield land) ahead of greenfield sites for new development. Brownfield land is usually a highly sustainable location for development, and it avoids loss of amenity and countryside and the car dependency which comes with use of greenfield sites. This has additional importance	Comments are noted – the Council can only use land that is made available to them during the Call for Sites process as part of the Local Plan review. The Council cannot meet the housing

Parish Council	<p>in the context of mitigating climate change. Furthermore, Valued Landscape should be avoided. The draft Local Plan should have a strategy and policies to implement these principles.</p>	<p>requirements by using brownfield land alone, and therefore, greenfield land is required. It is not always the case that brownfield land meets the development strategy of the district or is in an appropriate location to do so. Brownfield land is the preferred method for delivering development, but it is not always achievable; brownfield land should not automatically be considered over greenfield land by virtue of its status and should always be considered and developed on its planning merit.</p> <p>It is considered that policy D1 and the Natural Environment chapter provides an appropriate framework for considering impacts on landscape, with no need for repetition here.</p>
BHLF-KSAR-N8TB-D	<p>Prioritising brownfield development is rightly stressed for protection of the countryside, climate change and revitalisation of town centre. The rest of Barton Farm and developing Sir John Moore Barracks are key large scale projects, the timely completion of which will be vital to achieve housing targets, even if these could be reduced. Bushfield Camp is another example of brownfield development which should be a combination of housing and business use, not simply business.</p>	<p>Comments are noted – the Council can only use land that is made available to them during the Call for Sites process as part of the Local Plan review. The Council cannot meet the housing requirements by using brownfield land alone, and therefore, greenfield land is required. It is not always the case that brownfield land meets the development strategy of the district or is in an appropriate location to do so.</p>

		<p>Brownfield land is the preferred method for delivering development, but it is not always achievable; brownfield land should not automatically be considered over greenfield land by virtue of its status and should always be considered and developed on its planning merit.</p> <p>The Council considers that the housing needs of the plan area can be met in the residential allocations within the plan; therefore, it is not considered necessary to include residential development on the site at the Bushfield Camp.</p>
<p>BHLF- KSAR- N8TG-J</p>	<p>We strongly support this policy. However we would like to see specific mention of development of underutilised land, and re-allocation of for a more deliverable use to meet identified needs where there is no reasonable prospect of an application coming forward for a use allocated in this Plan. The policy would then better accord with NPPF.</p>	<p>Comments are noted – the Council can only use land that is made available to them during the Call for Sites process as part of the Local Plan review. It is not always the case that underutilised land meets the development strategy of the district or is in an appropriate location to do so.</p> <p>An allocated site does not preclude a site being developed for other purposes; the application would be determined in line with the development plan policies and supporting evidence</p>

		as part of the application process and planning balance exercise.
BHLF- KSAR- N8ZT-5	<p>Dominion fully supports the approach to making the best use and optimising densities on brownfield sites. The policy could go further and recognise that on sites in urban areas or regeneration sites, open space standards and car parking standards may not be met but the Council would accept financial contributions towards such requirements and look to encourage car clubs in such locations (subject to interest from car club operators).</p>	<p>Support is noted – policy NE3 allows for off-site financial contributions for open space where it is not necessary for the required amount to be delivered on site.</p> <p>Policies T2 and T3 address parking standards and support a reduction in parking provision where it can be proven it would not be at the detriment to the surrounding area. Car clubs are supported in policy T3 – as the plan is read and used to determine applications as a whole, it is not necessary to include additional wording in policy D6.</p>
BHLF- KSAR- N8BF-Y	<p>We support the approach in draft policy D6. Considers that the reference to “within existing settlements” could be interpreted as being informed by defined settlement boundaries. This being the case, it will fail to recognise the development potential of all brownfield sites in sustainable and accessible locations unless settlement boundaries are reviewed/amended.</p> <p>5.78 Construction management plans are a standard requirement of the local validation list for all major development, not just "large and prolonged" schemes. Developers need certainty, so it would be preferable to explain that a CMS is needed for all major development but explain that it should be proportionate to the scale and type of development involved.</p>	<p>Comments are noted – development outside of a defined boundary is considered to fall into the open countryside with only certain types of development supported in these locations, <u>though policy SP3 does recognise that some settlements do not have defined boundaries.</u> It is not considered that the majority of land in these locations conforms to the development strategy or that all brownfield land meets the development strategy of the district or is in an</p>



		<p>appropriate location to do so. Brownfield land is the preferred method for delivering development, but it is not always achievable; brownfield land should not automatically be considered developable land by virtue of its status and should always be considered and developed on its planning merit.</p> <p><u>Revisions to paragraph 5.78 are agreed.</u></p> <p><u>Proposed change –</u></p> <p><u>5.78 For large or prolonged major developments, consideration will need to be given to controlling impacts of construction traffic and smoke, dust, noise and water runoff during the construction phase. A comprehensive construction management plan proportionate to the type, scale and context of development detailing control measures to be applied will usually be expected.</u></p>
<p>BHLF- KSAR- N8BY-J</p>	<p>I agree with OBPC who strongly supports the use of previously developed land (brownfield land) ahead of greenfield sites for new development protects and enhances the landscape, scenic and amenity value of the district, including ensuring the preservation of tranquillity, and intrinsic dark skies.</p>	<p>Comments are noted – the Council can only use land that is made available to them during the Call for Sites process as part of the Local Plan review. The Council cannot meet the housing</p>

		<p>requirements by using brownfield land alone, and therefore, greenfield land is required. It is not always the case that brownfield land meets the development strategy of the district or is in an appropriate location to do so. Brownfield land is the preferred method for delivering development, but it is not always achievable; brownfield land should not automatically be considered over greenfield land by virtue of its status and should always be considered and developed on its planning merit.</p>
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**Comments which neither support nor object to D6 - Brownfield development and making best use of Land**

<b>Respondent number</b>	<b>Comment</b>	<b>Officer comment</b>
<p>ANON- KSAR- NKNP-8 Otterbourne Parish Council</p>	<p>The policy to give priority to the development of previously developed land is commendable but in locations where brown field land is not available (eg. Otterbourne) then the use of green field land cannot be avoided.</p>	<p>Comments are noted – the Council can only use land that is made available to them during the Call for Sites process as part of the Local Plan review. The Council cannot meet the housing requirements by using brownfield land alone, and therefore, greenfield land is required. It is not always the case that brownfield land meets the development strategy of the district or is in an appropriate location to do so. Brownfield land is the preferred method for delivering development, but it is not always achievable; brownfield land should not automatically be considered over greenfield land by virtue of its status and should always be considered and developed on its planning merit.</p>

<p>ANON- KSAR- NK47-N</p>	<p>I support the use of brownfield sites ahead of greenfield sites for new development. Building on strategic gaps, land that has significant biodiversity or is a valued landscape should be avoided. I am concerned that this draft plan does not put sufficient emphasis on avoiding such sites.</p>	<p>Comments are noted - Strategic gaps (referred to in the draft plan as 'Settlement Gaps') are required to be maintained for certain areas under policy NE7. Further to this, development outside of a defined development boundary is restricted to prevent the coalescence of towns and villages. The maintenance of settlement gaps is a constant of the Natural Environment policies and is referenced a number of times within the policy background and under XI of the policy Key Issues.</p> <p>Land with a significant biodiversity value is protected under the Biodiversity and Natural Environment policies, in particular NE1 and NE5. It should be noted that Biodiversity Net Gain is now a requirement for development under the Environment Act 2021</p>
<p>ANON- KSAR- N8XZ-9</p>	<p>Clarity needed. "The primary determinant of the acceptability of a scheme will be how well the</p>	<p>Decisions will be taken by the decision maker (officer or Planning Committee) in light of</p>

Denmead Parish Council	<p>design responds to the general character and local distinctness of the area in which it is located."</p> <p>What criteria will be used? Subjective view of the Planning Officer?</p>	<p>the evidence, national planning policy and the adopted development plan. The Plan needs to be read as a whole and Policy D1 will provide additional guidance.</p>
ANON-KSAR-N8WJ-R	<p>Clarification is required as to who is going to enforce this policy and how it is going to be enforced. It is a generally good idea but since the housing requirements for the area have been allocated between the towns and villages, the use of brownfield sites has been made irrelevant. In the absence of brownfield sites, towns and villages are obliged to put forward greenfield sites for development which is contrary to other policies in this document.</p>	<p>Comments are noted – the Council can only use land that is made available to them during the Call for Sites process as part of the Local Plan review. The Council cannot meet the housing requirements by using brownfield land alone, and therefore, greenfield land is required. It is not always the case that brownfield land meets the development strategy of the district or is in an appropriate location to do so. Brownfield land is the preferred method for delivering development, but it is not always achievable; brownfield land should not automatically be considered over greenfield land by virtue of its status and should always be considered and developed on its planning merit.</p>

		<p>The policy is enforced, where possible, by the Planning Officers who are involved in the case determination. The policy is in addition to the allocations policy and would be used in the determination of applications that concern brownfield land. The use of greenfield land for development is not contrary to other policies, and nowhere, either nationally or locally is greenfield land prevented from usage for development.</p>
<p>BHLF- KSAR- N8TQ-V</p>	<p>Concerned about the proposals for housing on the fields adjacent to our home. and reject the use of using greenfield sites when there are adequate Brownfield sites available.</p> <p>I agree with OBPC who strongly supports the use of previously developed land (brownfield land) ahead of greenfield sites for new development and the allocation at Bushfield Camp, though have concerns regarding the increased traffic.</p>	<p>Comments are noted – the Council can only use land that is made available to them during the Call for Sites process as part of the Local Plan review. The Council cannot meet the housing requirements by using brownfield land alone, and therefore, greenfield land is required. It is not always the case that brownfield land meets the development strategy of the district or is in an appropriate location to do so. Brownfield land is the preferred method for delivering development, but it is not always achievable;</p>

		<p>brownfield land should not automatically be considered over greenfield land by virtue of its status and should always be considered and developed on its planning merit.</p> <p>Increased traffic is unfortunately <u>often</u> a byproduct of development - it should be noted the Local Plan review proposes development plan policies to mitigate this increase and the adverse impacts.</p>
<p>BHLF- KSAR- N8T2-W</p> <p><u>And</u></p> <p>BHLF- KSAR- N8T5-Z</p>	<p>I am very much in agreement with the response of Olivers Battery Parish Council.</p> <p>I especially agree with their comments regarding Brownfield development ( policy D6)</p>	<p>Comments are noted – the Council can only use land that is made available to them during the Call for Sites process as part of the Local Plan review. The Council cannot meet the housing requirements by using brownfield land alone, and therefore, greenfield land is required. It is not always the case that brownfield land meets the development strategy of the district or is in an appropriate location to do so. Brownfield land is the preferred method for delivering development, but it is not always achievable;</p>

		brownfield land should not automatically be considered over greenfield land by virtue of its status and should always be considered and developed on its planning merit.
BHLF- KSAR- N8T5-Z	<del>Having read the response of Oliver's Battery Parish Council I agree with their views. Particularly their comments regarding :- Brownfield development ( policy D6)</del>	Noted
BHLF- KSAR- N8BQ-A Historic Environment <a href="#">Link here</a>	<p>Minor typo to be corrected</p> <p>In order to ensure that development land within existing settlements is used most effectively, the local planning authority will prioritise development of brownfield land and expect higher densities on sites which have good access to facilities and public transport, particularly within the urban areas. The development potential of all sites should be optimised, consistent with the need to promote the delivery of high quality, well designed places.</p> <p>The primary determinant of the acceptability of a scheme will be how well the design responds to the general character and local distinctiveness of the area in which it is located.</p> <p>Full doc in SP for mark ups</p>	<p>Agree proposed change.</p> <p>Amend final para. Of policy D6 as follows –</p> <p>The primary determinant of the acceptability of a scheme will be how well the design responds to the general character and local distinctiveness of the area in which it is located.</p>
BHLF- KSAR- N8BE-X Environment Agency <a href="#">Link here</a>	This policy could be strengthened the following should be added: “Development of brownfield land can enable opportunities to remediate formally contaminated sites” Remediation and incorporating nature opportunities on development of brownfield sites could provide multiple benefits.	Whilst this is agreed it is thought ot be merely a statement of fact and will not encourage more brownfield development or lead to better development



		outcomes. No change proposed.
BHLF-KSAR-N863-Z	<p><u>Policy D6 Brownfield Development and Making the Best Use of Land</u></p> <p>The Policy seeks to prioritise development on brownfield land. However, it is unclear what this means in practice. For example, will the Council seek to refuse development on greenfield development sites if there are alternative brownfield sites? Notwithstanding that this policy approach departs from the advice in the NPPF, if this is the intention of the Plan, it should provide clear criteria for what evidence might need to be provided by applicants to justify greenfield development to meet housing needs in instances where there are an absence of deliverable/developable brownfield opportunities.</p>	<p>Comments are noted – all development applications will be tried against the relevant development plan policies. Policies do not exist that would prevent development occurring on greenfield land. Policy D6 actively encourages development on brownfield land but cannot prevent development occurring elsewhere on the basis of the status of the land. The Council have prioritised development on brownfield land in the site allocations.</p>

**Comments which object to D6 - Brownfield development and making best use of Land**

Respondent number	Comment	Officer comment
ANON-KSAR-NKH9-B	<p>Infrastructure in Bishops Waltham cannot take another 100 homes. I live nearby the new proposed site and knew nothing about this. I found out about it from people in Byron close who will be significantly impacted. It's appalling that this consultation was not expanded to include the Ridgemead estate, given we will also be impacted by yet more traffic, strain on public services and loss of countryside. You have made it exceptionally difficult for people to express their viewpoints and object, with minimal advertisement of this proposal to those who will be affected.</p>	<p>REALLOCATE TO BW4</p>
ANON-KSAR-NKHU-7 Oliver's Battery Parish Council	<p>OBPC strongly supports the use of previously developed land (brownfield land) ahead of greenfield sites for new development. Brownfield land is usually a highly sustainable location for development and it avoids loss of amenity and countryside and the car dependency which comes with use of greenfield sites. This has additional importance in the context of mitigating climate change. Furthermore, Valued Landscape should be avoided. The draft Local Plan should have a strategy and policies to implement these principles.</p>	<p>Support is noted - the Council can only use land that is made available to them during the Call for Sites process as part of the Local Plan review. The Council cannot meet the housing requirements by using brownfield land alone, and therefore, greenfield land is required. It is not always the case that brownfield land meets the development strategy of the district or is in an appropriate location to do so. Brownfield land is the preferred method for delivering development, but it is not always achievable; brownfield land should not automatically be considered over greenfield land by virtue of its status and should always be considered and developed on its planning merit.</p>

		<p>It is considered that policy D1 and the Natural Environment chapter provides an appropriate framework for considering impacts on landscape, with no need for repetition here.</p>
<p>ANON-KSAR-NK2H-4</p>	<p>I strong support the prioritisation of brownfield sites but am concerned that greenfield sites need more protection. Government housing targets are changing and should be scrutinised again. The concept of Valued Landscape would help to protect greenfield sites and should be part of the Local Plan.</p>	<p>Support is noted - the Council can only use land that is made available to them during the Call for Sites process as part of the Local Plan review. The Council cannot meet the housing requirements by using brownfield land alone, and therefore, greenfield land is required. It is not always the case that brownfield land meets the development strategy of the district or is in an appropriate location to do so. Brownfield land is the preferred method for delivering development, but it is not always achievable; brownfield land should not automatically be considered over greenfield land by virtue of its status and should always be considered and developed on its planning merit.</p> <p>It is considered that policy D1 and the Natural Environment chapter provides an appropriate framework for considering impacts on landscape, with no need for repetition here.</p>

		<p>No national guidance or updates to the NPPF regarding housing need have been published since the DLUHC previously consulted on this. Therefore, the housing need assessed is what the Council are legislated by and will continue to do so until such a time guidance is published stating differently.</p> <p>It is considered that policy D1 and the Natural Environment chapter provides an appropriate framework for considering impacts on landscape, with no need for repetition here.</p>
<p>ANON-KSAR-NKDW-5 Littleton and Harestock Parish Council</p>	<p><del>1. The use of brownfield land to meet the needs of the district has the potential to make a greater contribution to reducing the carbon footprint of the district than greenfield sites. However, they can present a number of challenges to their re-use which requires clear guidance on how the local plan policies would be applied. The policy only refers to sites within settlements and makes no reference to sites in the countryside.</del></p> <p><del>2. The policy seeks to optimise the development potential of brownfield sites and to deliver higher densities. It recognises that there will be other considerations such as the need to create high quality places. The supporting text, ref paragraph 5.71 does reference the character of the site and wider area but does not include other key factors such as landscape and biodiversity. Littleton and Harestock Parish Council objects to the policy.</del></p> <p>Object to Policy D6. It does not extend to brownfield sites in the countryside. It should be amended to include other key considerations to</p>	<p>Comments are noted - the Council can only use land that is made available to them during the Call for Sites process as part of the Local Plan review. The Council cannot meet the housing requirements by using brownfield land alone, and therefore, greenfield land is required. It is not always the case that brownfield land meets the development strategy of the district or is in an appropriate location to do so, hence the restriction to within settlements; the open countryside is protected under policy H4, development that contravenes this (unless allowed by other policy) will be resisted.</p>

	the development of brownfield land such as landscape quality and biodiversity.	
ANON-KSAR-NKAP-U	<p>There is a need to clearly spell out that BROWNFIELD sites should be developed first. If a Brownfield site has not been developed for the first designated purpose within a specified time then it should be still considered as suitable for development but with a different purpose. Otherwise the designation becomes a protection not afforded to nearby green field areas.</p> <p>It is important that the principal of using Brownfield site first is made extremely clear within the local plan. It should be a strategic requirement.</p>	<p>Comments are noted – the Council can only use land that is made available to them during the Call for Sites process as part of the Local Plan review. The Council cannot meet the housing requirements by using brownfield land alone, and therefore, greenfield land is required. It is not always the case that brownfield land meets the development strategy of the district or is in an appropriate location to do so. Brownfield land is the preferred method for delivering development, but it is not always achievable; brownfield land should not automatically be considered over greenfield land by virtue of its status and should always be considered and developed on its planning merit.</p> <p>It is not understood what is meant by ‘designated purpose’ or what protection the ‘designation’ would be afforded. Neither greenfield or brownfield sites are protected under national policy, and both are able to be developed for any purpose that confers to a development strategy and development plan policies. Amending national guidance and legislation is</p>

		<p>outside of the remit of the Local Plan review; though existing permissions do have a condition attached to them generally stating ‘a material start on site is required within a three year period’.</p>
<p>ANON-KSAR-NKJV-A</p>	<p>Whilst prioritising brownfield sites is compliant with the approach set out in the NPPF, it should be recognised that a number of Winchester City’s brownfield site allocations have not come forward, despite their allocation in successive local plans. For example, Policy W7 - Central Winchester Regeneration is an existing Local Plan allocation (WIN4) that has been carried forward. This site was also allocated prior to the current Local Plan as Policy W.2 – Broadway/Friarsgate (Silver Hill) within the 2006 Local Plan Review. It has still not been delivered. Similarly, Policy W8 – Station Approach Regeneration Area is also an existing Local Plan allocation (WIN7) that has been carried forward.</p> <p>In bringing forward brownfield sites, it is advisable to apply a non - implementation rate due to the complexities surrounding such sites, and the evidence on non-delivery or alternatively provide additional allocated sites, such as at Wickham, in order to ensure that housing targets are met in the event that there are problems with the delivery of brownfield sites.</p> <p>There is an over reliance on brownfield sites some which have not been delivered which has the potential to affect the deliverability and therefore the effectiveness of the Local Plan. Should these sites not come forward as expected this would result in part of the buffer being used up.</p> <p>Furthermore, brownfield sites are not expected to deliver the same level of affordable housing as greenfield. Given the local plan’s priority to deliver affordable housing, there is a disconnect between the reliance</p>	<p>The potential difficulties to delivering development on brownfield land are recognised. The Plan responds to this by reducing the policy requirements for affordable housing for those locations. The deliverability if the proposed allocations has been subject to scrutiny as set out in the Development Strategy and Site Selection Background Paper, and it is considered that the proposed development strategy is deliverable.</p>

	placed on brownfield sites which are not going to deliver the quantum of affordable housing that greenfield sites are expected to and consequently the strategy needs to be altered to provide a better balance between greenfield and brownfield.	
ANON-KSAR-N8Y8-8	<p>I strongly support the use of previously developed land (brownfield land) ahead of greenfield sites for new development.</p> <p>Brownfield land is usually a highly sustainable location for development and it avoids loss of amenity and countryside and the car dependency which comes with use of greenfield sites. This has additional importance in the context of mitigating climate change.</p> <p>Furthermore, Valued Landscape should be avoided. The draft Local Plan should have a strategy and policies to implement these principles</p>	<p>Support is noted - the Council can only use land that is made available to them during the Call for Sites process as part of the Local Plan review. The Council cannot meet the housing requirements by using brownfield land alone, and therefore, greenfield land is required. It is not always the case that brownfield land meets the development strategy of the district or is in an appropriate location to do so. Brownfield land is the preferred method for delivering development, but it is not always achievable; brownfield land should not automatically be considered over greenfield land by virtue of its status and should always be considered and developed on its planning merit.</p> <p>It is considered that policy D1 and the Natural Environment chapter provides an appropriate framework for considering impacts on landscape, with no need for repetition here.</p>
ANON-KSAR-N8YU-5	<p>I strongly support the use of previously developed land (brownfield land) ahead of greenfield sites for new development.</p> <p>Furthermore, Valued Landscape should be avoided.</p>	Support is noted - the Council can only use land that is made available to them during the Call for Sites process

		<p>as part of the Local Plan review. The Council cannot meet the housing requirements by using brownfield land alone, and therefore, greenfield land is required. It is not always the case that brownfield land meets the development strategy of the district or is in an appropriate location to do so. Brownfield land is the preferred method for delivering development, but it is not always achievable; brownfield land should not automatically be considered over greenfield land by virtue of its status and should always be considered and developed on its planning merit.</p> <p>It is considered that policy D1 and the Natural Environment chapter provides an appropriate framework for considering impacts on landscape, with no need for repetition here.</p>
ANON-KSAR-NK3N-B	<p>Policy D6 restricts the need for Brownfield use to optimise the use of development land within existing settlements. The choice is more normally between using Brownfield land and using undeveloped countryside. This policy must be amended to better reflect the choices that planners and developers are being asked to make.</p>	<p>Comments are noted - the Council can only use land that is made available to them during the Call for Sites process as part of the Local Plan review. The Council cannot meet the housing requirements by using brownfield land alone, and therefore, greenfield land is required. It is not always the case that brownfield land meets the development strategy of the district or</p>



		is in an appropriate location to do so, hence the restriction to within settlements; the open countryside is protected under policy H4, development that contravenes this (unless allowed by other policy) will be resisted for both brownfield and greenfield sites.
ANON-KSAR-N8GP-E	the primary determinant of acceptability - how well the design responds to the general character and local distinctiveness This is very subjective and needs clearer definition	Decisions will be taken by the decision maker (officer or Planning Committee) in light of the evidence, national planning policy and the adopted development plan. The Plan needs to be read as a whole and Policy D1 will provide additional guidance.
ANON-KSAR-N85Q-W	<p>I object to the implementation of the policy in redevelopment of the MOD site in Littleton on the following grounds:</p> <p>Significant negative impact to quality of life on Littleton and Harestock residents. Notably :</p> <ol style="list-style-type: none"> <li>1. Significant increase in traffic on existing unsuitable and under repaired road infrastructure , which already experiences above planned and capacity traffic. The associated health and safety risks due to air and noise pollution, road traffic accidents will adversely affect current and any future residents to the area.</li> <li>2. Insufficient existing or planned infrastructure for the proposed development , for retail, health and education. The area has already seen a significant increase in traffic and service demand due to the Kings Barton development currently underway which has yet to be completed.</li> </ol>	REALLOCATE TO W2

	<p>3. While this plan is alleged to be redevelopment of a brownfield site, any common sense definition can see that this area currently has significant biodiversity and carbon positive benefits to the community, and should be defined as a green belt area.</p> <p>4. The plan is illogical and poorly conceived for such an opportunity to enhance Winchester and its environs through a more environmental and public amenity use of the MOD site that is becoming available, for the benefit of current and future generations. There are far more truly brownfield sites in Winchester that require urgent development without the council attacking our green belt in contradiction of its declared climate emergency status.</p>	
ANON-KSAR-NKJC-Q	It appears this policy relates to all PDL, not just sites within 'urban areas'. That being the case, the 'primary determinant' should in our view be whether the development of the site contributes to sustainable patterns of growth. PDL in isolated locations for example may not constitute a suitable location for particular uses or intensification of uses. We would suggest this distinction is made for avoidance of doubt, which would align better with and help deliver the emerging Local Plan's sustainability objectives.	Comments are noted – the policy pertains to 'development land within existing settlements'; to that end, development outside of a settlement boundary (in line with policy H4) will be resisted in order to ensure development is contained to the right locations and confers to the development strategy.
ANON-KSAR-N8GX-P	This is not clear and requires further clarification and definition	Comment is noted – although it is not understood what is being referred to.
ANON-KSAR-NKJ1-5  <u>And</u>	<p>Winchester College support the principle of Policy D6. However, for clarification, the wording of the policy should be amended to take account of the fact that higher densities may not be appropriate for all development proposals, for instance where heritage assets may be affected.</p> <p>Wording should be amended as follows: "In order to ensure that development land within existing settlements is</p>	<p>Agree amendment.</p> <p>Proposed change. Amend first sentence of policy D6 as follows –  <i>"and expect higher densities <b>where appropriate on sites</b>"</i></p>

BHLF- KSAR- N8ZV-7	used most effectively, . . . and expect higher densities, <b><u>where appropriate</u></b> on sites which have good access . . . well-designed places.”	
ANON- KSAR- N81F-E	<p>Not all previously developed land is within settlements, but may be in other suitable locations, such as edge of settlements with not all development opportunities within settlements being brownfield. The Local Plan needs to recognise the viability implications of developing previously developed land. What measures will the Council adopt to improve the viability of developing these sites? There should be cross reference to Policy C8 (Contaminated land).</p>	<p>Comments are noted – the Council can only use land that is made available to them during the Call for Sites process as part of the Local Plan review. It is not always the case that brownfield land meets the development strategy of the district or is in an appropriate location to do so, hence the restriction to within settlements; the open countryside is protected under policy H4, development that contravenes this (unless allowed by other policy) will be resisted, this includes edge of settlement land which is outside of the settlement boundary.</p> <p>The plan includes a reduction in affordable housing requirements for sites which are previously developed, to aid viability and delivery of previously developed land.</p> <p>The Local Plan is read in its entirety, with multiple policies applied to applications depending on the location and constraints; therefore, where D8 applies to a development, it would be</p>

		considered in association with all other relevant policies.
ANON-KSAR-N85J-P	<p>The draft Local Plan as such has been developed with a brownfield first approach. Bloor do not dispute the importance or principle of utilising brownfield site. However, Bloor do raise concerns regarding the fact that the WCC do not intend to release any greenfield sites until 2030 due to the finite source of brownfield land and the often harder viability challenges resulting in reduced affordable housing provision. (see full analysis in Section 3 of submitted representations).</p> <p>Draft Strategic Policy H2 states that the indicative phasing of the Plan will include approximately 4,700 dwellings between 2019/20 and 2023/24, 5,150 dwellings between 2024/25 and 2028/29, 3,610 dwellings between 2029/30 and 2033/34 and 2,160 dwellings between 2034/35 and 2038/39. As such in order to meet the required 434 affordable homes per annum this would require a provision of 36.5% 2019/20 and 2023/24 and 33.3% between 2024/25 and 2028/29 which are considerably higher than the 25%-30% (depending on phosphates) set out under policy H6. Based on the above, Bloor consider that WCC are required to release the most appropriate greenfield sites before 2030 to meet the local plan objectives.</p> <p>In addition to the above, there has been a historic under delivery of allocated brownfield sites, such as the Central Winchester Regeneration Area and Station Approach Regeneration Area which have a combined capacity of 550 dwellings. These have been carried forward from the previous Local Plan, and neither are subject to a submitted planning application which indicates there is unlikely to be progress will be made towards their delivery at the early stage of the draft Local Plan period.</p> <p>These concerns are echoed by Councillors at both Local Plan Advisory Meetings (LPAG) and Scrutiny, where they have requested evidence on</p>	<p>Comments are noted – development phasing has been determined to make the best use of land, considering major strategic development that is already underway, and prioritise previously developed land, aligning with plan objectives; the plan will ensure that an adequate level of development is completed throughout the planning period, delivering the objectives of the Local Plan and meeting the demonstrable housing need and as stated in Policy H2: “Sites will not be permitted in advance of the specified phasing unless they are needed to overcome a District-level housing land supply shortfall or would deliver housing which is demonstrated to be in priority need in the locality at the time”.</p>

	<p>the percentage of development which can be successfully delivered on brownfield, to which Officers have previously responded that Winchester does not have a large quantity of brownfield sites and they will make 'best' use of that available but this will not meet all of the Districts development requirements.</p> <p>Further analysis of the brownfield first approach is set out within the submitted (emailed) representations titled 'Manor Parks Regulation 18 Representations' and accompanying appendices.</p> <p>Bloor Homes supports WCC's approach to prioritising the redevelopment of brownfield land as set out in Policy D6, however notes that, as per the 'what are we aiming to achieve' subsection on page 99, there is a finite recourse, and in order to reach the Government housing requirement, WCC will be required to release more greenfield land prior to 2030 as referenced in section 2 para 2.22.</p>	
ANON-KSAR-N88Q-Z	<p>Add final paragraph</p> <p>Brownfield sites awaiting development proposals should be offered as temporary community spaces for food growing.</p>	<p>This is considered an overly prescriptive policy inclusion that is not supported by national policy. No change proposed.</p>
BHLF-KSAR-N8ZV-7	<p>Winchester College support the principle of the City Council's approach to making the best use of brownfield land in Policy D6. However, for clarification, the College requests that the wording of the policy is amended to take account of the fact that higher densities may not be appropriate for all development proposals, for instance where heritage assets may be affected.</p> <p>The College therefore requests that the policy is amended as follows (suggested additional text is underlined):</p> <p>"In order to ensure that development land within existing settlements is used most effectively, . . . and expect higher densities, <u>where appropriate</u> on sites which have good access . . . well designed places."</p>	<p>Agree amendment.</p> <p>Proposed change. Amend first sentence of policy D6 as follows –</p> <p><i><b>"and expect higher densities where appropriate on sites"</b></i></p>

<p>BHLF- KSAR- N8BZ-K</p> <p><u>And</u></p> <p>BHLF- KSAR- N8BK-4</p> <p><u>And</u></p> <p>BHLF- KSAR- N8BJ-3</p>	<p>Support policy, however, the reference to “within existing settlements” could be interpreted as being informed by defined settlement boundaries. This will fail to recognise the development potential of all brownfield sites in sustainable and accessible locations unless settlement boundaries are reviewed/amended. Therefore, clarification required as to meaning of “within existing settlements”.</p> <p><del>Paragraph 1.2 (bullet 3) of the Local Plan Forward states that this Local Plan seeks to protect our natural environment by adopting a ‘brownfield first’ approach to development opportunities. This is supported. However, failing to recognise the suitability of all brownfield sites in accessible locations undermines this ‘brownfield first’ approach. Brownfield sites which are currently located outside the defined settlement policy boundary, may nevertheless still be in accessible locations, close to local facilities and services. Therefore, recognising the potential for all brownfield sites in accessible locations could make a valuable contribution towards a more efficient use of land and buildings, will contribute to the preservation of our natural environment, and will reduce the reliance of greenfield sites for development.</del></p> <p><del>The question of what is meant by ‘existing settlements’ needs to be addressed/clarified. The Local Plan acknowledges that some communities don’t have a defined settlement policy boundary, and yet are referred to in the Local Plan as ‘settlements’.</del></p> <p><del>Draft policy D6 adds that higher densities will be expected on sites which have good access to facilities and public transport “particularly in urban areas”. This emphasis suggests that the local planning authority acknowledges that relevant policies are not focussed on land within settlement boundaries only and that there may also be sites outside urban areas which are accessible and suitable for redevelopment by following the ‘brownfield first’ approach. Clarity is required.</del></p> <p><del>We request that the settlement boundaries and/or draft allocations are</del></p>	<p>Comments are noted - the Council can only use land that is made available to them during the Call for Sites process as part of the Local Plan review. The Council cannot meet the housing requirements by using brownfield land alone, and therefore, greenfield land is required. It is not always the case that brownfield land meets the development strategy of the district or is in an appropriate location to do so, hence the restriction to within settlements; Policy H4 does recognise however that for those settlements without a boundary there is the potential for infilling development.</p>
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	<p>reviewed to include all suitable and accessible brownfield sites. It should also be clarified whether “within existing settlements” points generally to ‘built up/urban areas’— including those which fall outside settlement boundaries— or intentionally seeks to refer to land within defined boundaries only. It is suggested that “within existing settlements” should be deleted from Policy D6 (and supporting text) or amended to add “...within or well related to existing settlements”.</p>	
<p>BHLF- KSAR- N8BK-4</p>	<p><b>OBJECT</b>  <del>We support the approach in draft policy D6 to ensure that development land is used most effectively by prioritising the development of brownfield land. However, it is considered that the reference to “within existing settlements” could be interpreted as being informed by defined settlement boundaries. This being the case, it will fail to recognise the development potential of all brownfield sites in sustainable and accessible locations unless settlement boundaries are reviewed/amended.</del>  Paragraph 1.2 (bullet 3) of the Local Plan Foreward states that this Local Plan seeks to protect our natural environment by adopting a ‘brownfield first’ approach to development opportunities. This is supported. However, failing to recognise the suitability of all brownfield sites in accessible locations undermines this ‘brownfield first’ approach. Brownfield sites Winchester District Local Plan (Regulation 18) consultation  Representations obo Michael Culhane Pro Vision   50073   December 2022 which are currently located outside the defined settlement policy boundary, may nevertheless still be in accessible locations, close to local facilities and services. Therefore, recognising the potential for all brownfield sites in accessible locations could make a valuable contribution towards a more efficient use of land and buildings, will contribute to the preservation of our natural environment, and will reduce the reliance of greenfield sites for development.  The question of what is meant by ‘existing settlements’ needs to be</p>	<p>Comments are noted - the Council can only use land that is made available to them during the Call for Sites process as part of the Local Plan review. The Council cannot meet the housing requirements by using brownfield land alone, and therefore, greenfield land is required. It is not always the case that brownfield land meets the development strategy of the district or is in an appropriate location to do so, hence the restriction to within settlements; Policy H4 does recognise however that for those settlements without a boundary there is the potential for infilling development.</p>

	<p>addressed/clarified.</p> <p>The Local Plan acknowledges that some communities don't have a defined settlement policy boundary, and yet are referred to in the Local Plan as 'settlements'.</p> <p>Draft policy D6 adds that higher densities will be expected on sites which have good access to facilities and public transport "particularly in urban areas". This emphasis suggests that the local planning authority acknowledges that relevant policies are not focussed on land within settlement boundaries only and that there may also be sites outside urban areas which are accessible and suitable for redevelopment by following the 'brownfield first' approach. Clarity is required.</p> <p>We request that the settlement boundaries are reviewed to include all suitable and accessible brownfield sites. It should also be clarified whether "within existing settlements" points generally to 'built up/urban areas'—including those which fall outside settlement boundaries—or intentionally seeks to refer to land within defined boundaries only. It is suggested that "within existing settlements" should be deleted from Policy D6 (and supporting text) or amended to add "...within or adjoining existing settlements".</p>	
<p>BHLF- KSAR- N8BJ-3</p>	<p><b>OBJECT</b></p> <p>We support the approach in draft policy D6 to ensure that development land is used most effectively by prioritising the development of brownfield land. However, it is considered that the reference to "within existing settlements" could be interpreted as being informed by defined settlement boundaries. This being the case, it will fail to recognise the development potential of all brownfield sites in sustainable and accessible locations unless settlement boundaries are reviewed/amended.</p> <p>Paragraph 1.2 (bullet 3) of the Local Plan Foreward states that this Local Plan seeks to protect our natural environment by adopting a 'brownfield first' approach to development opportunities. This is supported. However, failing to recognise the suitability of all brownfield sites in accessible</p>	<p>Comments are noted - the Council can only use land that is made available to them during the Call for Sites process as part of the Local Plan review. The Council cannot meet the housing requirements by using brownfield land alone, and therefore, greenfield land is required. It is not always the case that brownfield land meets the development strategy of the district or is in an appropriate location to do so, hence the restriction to within settlements; Policy H4 does recognise</p>



	<p>locations undermines this 'brownfield first' approach. Brownfield sites which are currently located outside the defined settlement policy boundary, may nevertheless still be in accessible locations, close to local facilities and services. Therefore, recognising the potential for all brownfield sites in accessible locations could make a valuable contribution towards a more efficient use of land and buildings, will contribute to the preservation of our natural environment, and will reduce the reliance of greenfield sites for development.</p> <p>The question of what is meant by 'existing settlements' needs to be addressed/clarified. The Local Plan acknowledges that some communities don't have a defined settlement policy boundary, and yet are referred to in the Local Plan as 'settlements'.</p> <p>Draft policy D6 adds that higher densities will be expected on sites which have good access to facilities and public transport "particularly in urban areas". This emphasis suggests that the local planning authority acknowledges that relevant policies are not focussed on land within settlement boundaries only and that there may also be sites outside urban areas which are accessible and suitable for redevelopment by following the 'brownfield first' approach. Clarity is required.</p> <p>We request that the settlement boundaries are reviewed to include all suitable and accessible brownfield sites. It should also be clarified whether "within existing settlements" points generally to 'built up/urban areas' — including those which fall outside settlement boundaries — or intentionally seeks to refer to land within defined boundaries only. It is suggested that "within existing settlements" should be deleted from Policy D6 (and supporting text) or amended to add "...within or adjoining existing settlements".</p>	<p>however that for those settlements without a boundary there is the potential for infilling development.</p>
<p>BHLF- KSAR- N86N-U</p>	<p>Not all previously developed land is within settlements, but may be in other suitable locations, such as edge of settlements. And not all development opportunities within settlements are brownfield. The Local Plan needs to recognise the implications of developing previously developed land, including complications for dealing with contaminated</p>	<p>Comments are noted - the Council can only use land that is made available to them during the Call for Sites process as part of the Local Plan review. The Council cannot meet the housing</p>

	<p>land and the potential impact on the viability of delivering items such as affordable housing. What measures will the Council adopt to improve the viability of developing these sites? There should be cross reference to Policy C8 (Contaminated land).</p> <p>Para 5.78 - comment Construction management plans are a standard requirement of the local validation list for all major development, not just "large and prolonged" schemes. Developers need certainty, so it would be preferable to explain that a CMS is needed for all major development, but explain that it should be proportionate to the scale and type of development involved.</p>	<p>requirements by using brownfield land alone, and therefore, greenfield land is required. It is not always the case that brownfield land meets the development strategy of the district or is in an appropriate location to do so, hence the restriction to within settlements; Policy H4 does recognise however that for those settlements without a boundary there is the potential for infilling development. <u>The emerging Plan supports development of brownfield land by recognising the additional costs through reducing the requirement for affordable housing in those circumstances.</u></p> <p>The Local Plan is read in its entirety, with multiple policies applied to applications depending on the location and constraints; therefore, where D8 applies to a development, it would be considered in association with all other relevant policies.</p> <p><u>Agree paragraph 5.78 should be amended for clarity.</u> <u>Revised paragraph 5.78 –</u></p>
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**Comments which didn't answer D6 - Brownfield development and making best use of Land**

Respondent number	Comment	Officer comment
BHLF-KSAR-N8ZD-N	<p>Phased Delivery of Proposed Allocations and the Brownfield First Approach</p> <p>6.22 The Draft Local Plan (at paragraph 1.2 and elsewhere) refers to a 'brownfield first' approach, which is then reflected in Draft Policy H2 through the notion of 'phased development'. This seeks to restrict the delivery of greenfield sites, in favour of the early delivery of previously developed land.</p> <p>6.23 Whilst the policy wording acknowledges that sites could be permitted to come forward ahead of their specified phasing, if the five-year housing land supply ('5YHLS') position is deficient, the overall approach does not meet with the tests of soundness. Indeed, the proposal to artificially restrict the delivery of sites runs contrary to the requirements of NPPF Paragraph 60. This states that;</p> <p>6.26 Moreover, it is not clear why allocations on previously developed land should be expected to come forward more easily and quickly than allocations on greenfield sites. Indeed, the approach appears counterintuitive, noting that brownfield sites are often already occupied for a non-residential purpose or may otherwise be subject to complexities and constraints, such as contamination. Indeed, this fact is acknowledged at paragraph 9.22 of the Draft Local Plan.</p> <p>6.27 The widely cited Lichfield's 'Start to Finish' report (2020) sets out research into the delivery of different types of development sites. The report finds that large brownfield sites deliver at a slower rate than greenfield sites, noting that the average build-rate for greenfield sites is 34% greater when compared to equivalent brownfield sites. Therefore, the reliance on brownfield sites in the first half of the Plan-period is likely to cause under-delivery. The approach therefore undermines the effectiveness of the Plan as a whole.</p>	<p>Comments are noted – paragraph 68 of the NPPF requires a LPA to specify deliverable sites for years 1 – 5 of the plan period; and developable sites for years 6 – 10, and where possible years 11 – 15. The plan has achieved this and has assessed development within a deliverable trajectory. The NPPF does not stipulate the land type this should come forward as, and neither does this approach artificially restrict the delivery of sites as the housing trajectory confirms the plans delivery. The 5YHLS is a mechanism in place to ensure the delivery of housing <del>for</del> <u>when in the event that</u> the plan fails; the Council have been proactive in <u>their its</u> approach by allowing the development of greenfield sites early for <del>when if</del> a situation occurs that the delivery does not align with the plan's trajectory. This therefore demonstrates the Council <del>have has</del> a. positively prepared the plan by providing a deliverable strategy (and a mechanism should unforeseen circumstance prevent the evidenced delivery), b. justified in the approach with an appropriate strategy seeking to deliver brownfield land first, c. has set out an effective trajectory, and d.</p>

	<p>6.28 As noted, Policy H2 would allow for a deviation from the proposed phased approach, if this is required to ensure that a 5YHLS can be maintained. This implies that WCC anticipates that the brownfield-first approach will not be effective at sustaining a 5YHLS. Indeed, in seeking to artificially restrict the development of greenfield sites (unless the 5YHLS position is different), the policy tacitly invites Section 78 appeals and a 'planning-by-appeal' approach.</p> <p>6.29 Overall, Croudace consider the brownfield-first phased approach to be unnecessary, unjustified, ineffective, and inconsistent with national planning policies. WCC should reconsider this aspect of the Plan, in order to decrease the likelihood of the Plan being found unsound at Examination.</p> <p>"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay". (our emphasis)</p> <p>6.24 The NPPF is unambiguous then that allocated sites should be developed without 'unnecessary' delay. In contrast, the Draft Local Plan seeks to restrict the building out of many sites until later in the Plan-period. There appears to be no reasoned justification for this, other than the intention to prioritise brownfield-led development.</p> <p>6.25 Whilst the redevelopment of previously developed land finds support in the NPPF, the Framework does not refer to a brownfield-first approach. Therefore, there is no obvious basis in national planning policies for the approach proposed in the Draft Local Plan. Noting this and taking account of the conflict with NPPF paragraph 60, WCC's approach fails as a matter of principle.</p>	<p>consistent with that of paragraph 68 of the NPPF.</p>
<p>BHLF- KSAR- N86C-G</p>	<p>Due to the format of the PDF submitted via email, please see additional info saved on sharepoint for the response to this policy</p>	<p>Support is noted.</p>

	Full response supports the policy and provides reasoning on why the policy is sound and will ultimately meet the test of soundness.	
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Comments from other topics		
ANON-KSAR-NK9M-G	Sometimes brownfield sites contain a wide diversity of flora & fauna. I would like this to be assessed before planning permission is given.	The Local Plan is read in its entirety. Policies in the Natural Environment Chapter will address the nature conservation value of sites.
ANON-KSAR-N8GX-P	You need a much clearer and concise definition. This is open to misinterpretation.	Comment is noted – it is difficult to understand which aspect of the policy this is referring to given that an example has not been provided.
ANON-KSAR-N838-2	Brownfield sites should be used in the first instance as they have already been designated and developed.	Comments are noted – the Council can only use land that is made available to them during the Call for Sites process as part of the Local Plan review. The Council cannot meet the housing requirements by using brownfield land alone, and therefore, greenfield land is required. It is not always the case that brownfield land meets the development strategy of the district or is in an appropriate location to do so. Brownfield land is the preferred method for delivering development, but it is not always achievable; brownfield land should not automatically be considered over greenfield land by virtue of its status and should always be considered and developed on its planning merit.

<p>ANON-KSAR-NKZ5-S</p>	<p>Creative use of best and most versatile agricultural land without hindering land production is now possible. This opportunity needs profiling/understanding set against the need for carbon net zero and biodiversity protections. Needs to include no of applications for solar farms on the best and most versatile (BMV) land.</p> <p>This is important so WCC changes the approach for opportunities to net zero as stated here. Specifically, to not accept blindly the current government guidance to planning authorities for a “strong presumption” against solar farms on the best and most versatile (BMV) land.</p> <p>Crop and /or livestock production failing to use land and light twice for maximum net zero contributions inc. for biodiversity enhancement plus new green businesses and economy benefits is a missed opportunity for the two crises.</p> <p>Land production can be enhanced with economic benefits for land users with this dual approach with twin income streams benefits for agriculture land managers.</p>	<p>REALLOCATE TO CN5</p>
<p>ANON-KSAR-NK21-D</p>	<p>Objection to policy – general support but proposes challenges such as increased densities being at odds with other policy areas (notably D1).</p> <p>The prioritisation of brownfield land is not supported by the NPPF. As written the policy would prevent greenfield development coming forward until the end of the plan period.</p> <p><del>Whilst there is general support for the re-use of previously developed land, it is important to note that it brings with it specific challenges. For example, a policy imperative to increase densities may not be consistent with prevailing character, and as such there becomes an internal policy conflict between the requirements of Policy D6 and Policy D1 (amongst others).</del></p>	<p>Comments are noted – policy D6 expects higher densities in development where it is able to do so; it is not an immovable policy criterion and had it been an aspect of policy that is to be adhered to, it would categorically state this. As written, the policy clearly states: <i>The primary determinant of the acceptability of a scheme will be how well the design responds to the general character and local distinctness of the area in which it is located.</i></p>

	<p><del>The policy refers to prioritising the use of previously developed land, which we object to. There is no such sequential approach set out in national policy, this having been expressly removed with the introduction of the NPPF in 2012. In its strictest reading, as drafted the policy would require any greenfield development to be phased towards the end of the plan period, to allow for previously developed land to be 'prioritised', which we do not consider is the intention. We also consider that the issue of development viability ought properly to be addressed in this policy; by prioritising previously development land in the way the policy does, it would place too great an emphasis on using brownfield opportunities at the expense of other important planning objectives, such as delivering affordable housing (which may not be realised in circumstances where excessive remediation costs bear on a sites' development viability).</del></p>	<p>Therefore, when determining an application, the decision taker will, when weighing up the planning balance and considerations of the area, determine the application on that basis; should a higher density be at the expense of the character of the area, weight to this material consideration will be applied as necessary and a decision made accordingly. The decision taker will understand this in their professional capacity and will also seek advice from other departments, notably planning policy and design.</p> <p>The NPPF throughout chapter 11 references the usage of brownfield land, to <i>make as much use as possible</i> (para 119); and <i>give substantial weight to using brownfield land</i> (para 120c). The policy does not prevent the use of greenfield land for development and any development proposals that come forward on greenfield land will be tried against the relevant policies and determined on the basis that the proposals confer (or not) to the policies within the development plan. The Council has however, phased development so that in years 1 – 5, brownfield allocations are developed prior to greenfield allocations of which are proposed to</p>
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		come forward post 2030 (subject to policy allowances that state greenfield land can come forward in advance of 2030, should an evidenced need allow a provision for this).
ANON-KSAR-N819-1	<p>Creative use of best and most versatile agricultural land without hindering land production is now possible. This opportunity needs profiling/understanding set against the need for carbon net zero and biodiversity protections. Needs to include no of applications for solar farms on the best and most versatile (BMV) land.</p> <p>This is important so the changes in the approach for opportunities to net zero as recorded. Specifically, to not accept blindly the current government guidance to planning authorities for a "strong presumption" against solar farms on the best and most versatile (BMV) land.</p> <p>Crop and /or livestock production failing to use land and light twice for maximum net zero contributions inc. for biodiversity enhancement plus new green businesses and economy benefits is a missed opportunity for the two crises. Land production can be enhanced with economic benefits for land users with this dual approach with twin income streams benefits for agriculture land managers.</p>	BEEN ASKED TO REALLOCATE TO CN5

	Recommendations	Officer response
Comments from SA	<p>Recommendations D5, D6, D7 and D9</p> <p>5.79 The following recommendations for the policy text are included to help mitigate any negative effects and strengthen any positive effects identified:</p> <ul style="list-style-type: none"> <li>■ Policy D6 could be strengthened by requiring that determination of what should be considered an appropriate density should take potential impacts on the amenity of neighbouring uses into consideration. At present the policy</li> </ul>	<p>Comment is noted and will be implemented. <u>Added "as appropriate" - amenity of neighbouring uses is now added to policy D1.</u></p>

	sets out that the acceptability of a scheme should be determined primarily based on its response to general character and local distinctiveness.	
Comments from HRA		

## Policy D6 Brownfield development and making best use of Land

### Amendments to supporting text

#### **Delete paragraph 5.71.**

### Amendments to policy

In order to ensure that development land within existing settlements is used most effectively, the local planning authority will prioritise development of ~~brownfield land~~ **previously developed land**, and expect higher densities **where appropriate** on sites which have good access to facilities and public transport, particularly within the urban areas. The development potential of all sites should be optimised, consistent with the need to promote the delivery of high quality, well designed places.

The primary determinant of the acceptability of a scheme will be how well the design responds to the general character and local **distinctiveness** of the area in which it is located.