

Consultation comments on policy CN5 - Renewable and Low Carbon Energy Schemes

- Support - 20
- Neither support of object - 13
- Object – 19

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.

Comments in support of policy CN5 – renewable and low carbon energy schemes		
Respondent number	Comment	Officer comment
ANON-KSAR-NKGG-R	It is important that the points highlighted in this policy are upheld in practice	Support welcomed and comments noted.
ANON-KSAR-NKBD-G	I think it is vital to retro-fit housing to reduce carbon emissions and create energy efficient homes.	Retro-fitting existing homes is unfortunately, beyond the remit of the LP. There are, however, initiatives that are run by HCC whereby an existing householder can register their interest in a solar buying scheme. Recommended response: No change
ANON-KSAR-NKDW-5 Littleton and Harestock Parish Council	Littleton and Harestock Parish Council warmly welcomes the intentions to put climate change, adaptation and mitigation at the heart of the Plan's strategy. Given the challenges we face, there is no other option than to address these head on. Of course future practice needs to match the good intentions, but whenever there is a perceived balance between climate considerations and other factors, the imperatives of addressing climate change should be uppermost. Littleton and Harestock Parish Council supports these	Support welcomed and comments noted.

	<p>policies.</p> <p>Support policies CN1-7 inclusive.</p>	
ANON-KSAR-NKYT-Q	<p>Excellent, except that more emphasis should be given to providing help for those with older housing stock to get insulation improvements done BEFORE adapting heating systems, as otherwise there will be no advantage in doing so.</p> <p>If new builds are limited, as they should be to social housing only, there is great opportunity to install a centralised heating system, using low carbon generation and renewables.</p>	<p>Retro-fitting existing homes is unfortunately, beyond the remit of the LP. There are, however, initiatives that are run by HCC whereby an existing householder can register their interest in a solar buying scheme. Recommended response: No change.</p> <p>Centralised heating systems is one option that can be pursued although these tend to be only be appropriate financial viable on larger development proposals. Recommended response: No change.</p>
ANON-KSAR-NK9M-G	<p>I'm worried that money (council subsidies or not) may be wasted on "cowboy" providers of wall or roof insulation or solar panels and understand that there is little regulation of who can set up as a provider of these products. Can the council monitor this effectively?</p>	<p>Monitoring roof insulation and the installation of solar panels are unfortunately, beyond the remit of the LP. Reputable renewable energy installation companies should be members of Renewable Energy Consumer Code (RECC). Membership of RECC indicates that a company has signed up to its Office of Fair Trading approved Consumer Code, which ensures high service standards before, during and after the installation of renewable energy technology. Many UK solar energy manufacturers, suppliers and installers are also members of the Solar Trade Association (STA). There is an initiative that is run by HCC whereby an existing householder can register their interest in a solar buying scheme and that way homeowners can have assurance that they are only dealing with only reputable companies as various checks would have been undertaken by HCC as part of setting up this scheme. Recommended response: No change.</p>

ANON-KSAR-N8XY-8	I think recycling standards for construction materials should be considered throughout the plan rather than just applied to renewable energy developments.	Paragraph 4.16 of the Reg 18 LP identifies the need for developers to consider the role of embodied carbon as part of the design process and whether buildings can be reused/refurbished. A report has now been prepared as part of the LP Evidence Base that has identified the different options for tackling embodied carbon and how this can be addressed in the LP. Recommended response: see policy on embodied carbon
ANON-KSAR-N85J-P	Bloor, are also supportive of polices CN5 – CN7 to increase renewable and low carbon energy generation, micro generation and energy storage schemes.	Support welcomed and comments noted.
BHLF-KSAR-N8T8-3 Olivers Battery	<p>Renewable energy schemes can cause significant harm to landscape and the natural environment. So, OBPC agree that specific policies are needed for conservation and enhancement of the natural environment.</p> <p>The generation of low carbon energy should be seen within the wider national context and the specific circumstances of the district, where 40% of the land is within SDNP. Any significant solar or wind energy schemes need to be carefully considered in the light of the loss of rare and valued landscape and best and most versatile agricultural land.</p> <p>Food supplies are a matter of national security and the potential loss of the best and most versatile agricultural land should explicitly state Grade 1 - 3b. Proposals should only be permitted where it can be demonstrated they will cause "no significant harm to the landscape or visual amenity".</p>	<p>Recommended response: Change</p> <p>Criteria ii should be changed to: The need to avoid an unacceptable impact on landscape, character and visual amenity by undertaking a Landscape Visual Appraisal/Impact Assessment. Proposals should only be permitted where it can be demonstrated they will cause no significant harm to the landscape or visual amenity.</p> <p>Solar farms sit on the ground, the land can still be used for other purposes (sheep grazing) and they can at a later stage revert to use as agricultural land. The district does not have a wealth of previously developed land it is not considered appropriate to make the development of solar farms on greenfield land the exception. Recommended response: No change. Agree</p>

	<p>Because of their potential for significant harm, a Landscape and Visual Impact Assessment should always be a requirement for large schemes, irrespective of their location.</p> <p>Also, the policy should require a specific benefit to local communities be demonstrated.</p> <p>Like the brownfield first approach for new development, existing domestic, commercial and agricultural roof space should be prioritised over greenfield sites.</p>	<p>Criteria ii requires planning application for renewable and low carbon energy schemes to submit a Landscape Visual Appraisal/Impact Assessment.</p> <p>Criteria v already requires applicants to demonstrate the benefit to host communities. Recommended response: No change</p> <p>The district does not have a wealth of previously developed land. A study is being undertaken on the potential for roof top solar but in order to meet the council's climate emergency greenfield sites will be needed for solar farms. Recommended response: No change</p>
	<p>Hazeley is also supportive of policies CN5-CN7 to increase renewable and low carbon energy generation, micro generation and energy storage schemes.</p>	<p>Support welcomed and comments noted.</p>

Comments which did not answer whether they support, object or neither support or object to policy CN5 - renewable and low carbon energy schemes		
Respondent number	Comment	Officer comment
<p>ANON-KSAR-NKS3-G Bishops Waltham Parish Council</p>	<p>CN5 Page 52 x. Battery Storage Comment: The latest technology has confirmed that the risk of fire is extremely slim</p>	<p>Support welcomed and comments noted.</p>

ANON-KSAR-NKB7-3	Nothing is said about encouraging developers to design in air-source heat pumps, widely integrated into new developments in Scandinavia. Easy to integrate into new build, difficult to retrofit.	It is important to read the LP as a whole. Policy CN5 is particularly around larger renewable and low carbon schemes rather than individual households. In order to meet the requirements of Policy CN3, air source heat pumps which are powered off of PV panels can be one option. Recommended response: No change.
ANON-KSAR-NK4Z-R	This should be more specific and measurable.	All of the LP policies will be monitored through the Authorities Monitoring Report. For more details please refer to the monitoring topic. Recommended response: No change
ANON-KSAR-NK29-N	Para 4.40 – Last bullet, add ‘which can be complemented by community energy schemes.’	Paragraph 4.40 is summarising the outputs from Winchester Action on the climate crisis Report 2021. Whilst it is accepted the community energy schemes have an important role to play this is not considered to be the most appropriate location in the LP to make this reference. Recommended response: No change
ANON-KSAR-NKDG-N/ ANON-KSAR-N8XG-P	<p>Paragraph 4.38. We endorse the Plan’s support for retrofitting existing buildings. We would like this section to go further and state a preference for sensitive retrofitting above demolition and rebuilding. At the very least we would like to see a reference to future guidance on this topic similar to that produced by the Mayor of London: https://www.dezeen.com/2022/04/21/london-plan-guidance-retention-sadiq-khan/</p> <p>Paragraph 4.39. Please change 17% to 100%. This is the “target potential” identified in the Study. And please delete the two sentences about energy potential in the South Downs National Park. There is no content resembling these sentences in the Study.</p>	<p>A report has now been prepared as part of the LP Evidence Base that has identified the different options for tackling embodied carbon and how this can be addressed in the LP. Recommended response: see new policy on embodied carbon.</p> <p>The 17% figure comes from a study called ‘Renewable Energy Study for Winchester District Development Framework’ in 2008 (page 4) which forms part of the evidence base to the LP. The two sentences proceeding this are also from this document. Both the landscape/topography are something that will not have changed since 2008. Recommended response:</p>

	<p>Paragraph 4.40 Please add a further bullet point: “It would additionally require the potential for wind energy that exists within the District to be activated, as outlined in the Study.”</p> <p>Paragraph 4.44 Please delete or move to one of the Residential sections. District Energy Systems are not normally structured as community energy and usually necessitate a non-renewable energy source.</p> <p>Policy CN5 Whilst this represents a permissive policy, it is less permissive than the corresponding Policy in the existing Local Plan, both in wording and in the expanded list of constraints. The Policy should take a much more positive tone to encourage such schemes.</p> <p>(viii) If it is necessary to include a lighting condition, we request that it should be no more restrictive than the policies for equestrian, leisure and rural developments.</p>	<p>Add ‘2008’ after the words ‘A Renewable Energy Study’ in order to make it clear that paragraph 4.39 relates to this study and not the 2022 study.</p> <p>For the reasons outlined above, the landscape and the topography conclusions will not have altered since 2008 study and in this respect, it is considered not appropriate to include these recommendations. Recommended response: No change.</p> <p>The text is not meant to imply that community energy schemes will be District Energy Systems. Recommended response: In order to avoid any potential confusion remove the heading at the top of the page ‘Community Energy Schemes’.</p> <p>Whilst the council wants to be supportive of renewable and low carbon schemes the wording of Policy CN5 has been updated to ensure that it covers all of the matters that need to be assessed and it has been updated to take on the latest advice on matters such as an emergency plan for battery storage. Recommended response: No change.</p> <p>Given the size of renewable and low carbon schemes combined with the fact that they are usually in the countryside it is considered appropriate to ensure that</p>
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	<p>x) we request that this condition be omitted as the question of fire safety for batteries will be covered by relevant industry fire regulations.</p> <p>(xi) we suggest that recycling standards for construction materials should be considered throughout the Plan rather than applied to renewable energy developments in isolation. For information, solar panels are classified as electronic equipment for purposes of the Waste Electrical and Electronic Equipment (WEEE) regulations imposed by the Environment Agency.</p> <p>Add xii to restore the reference in the existing Local Plan to : “contribution to national, regional & sub-regional renewable energy targets.”</p>	<p>the lighting is restricted to emergency use only. Recommended response: No change.</p> <p>Given the importance of this issue, it is considered essential that this information is made available as part of the planning application process. Recommended response: No change.</p> <p>Given that solar panels are composed of glass, plastic, aluminium and silicon which are all widely recycled it is considered important that as part of the planning application process the site promoter includes details at the planning application stage of the recycling of these materials. Recommended response: No change.</p> <p>The NPPF requires LP’s to have a positive framework to support renewable emergency. Allied to this the City Council has a climate emergency and the evidence base is indicating that in order to meet the 2030 target of carbon neutrality there the greatest potential will be from solar farms. As this is the case, there is no real benefit in including the additional text that has been put forward in this representation Recommended response: No change.</p>
ANON-KSAR-N8QD-C	The Climate Assembly participants welcome the council support for retrofitting in Paragraph 4.38 and would like it to be strengthened by offering incentives for residents	Retro-fitting existing homes is unfortunately, beyond the remit of the LP. There are, however, initiatives that are run by HCC whereby an existing householder can

	<p>to undertake retrofitting. They are in favour of community energy projects as outlined in paragraph 4.42, and also propose that CN5 should err on the side of default planning approval for renewable energy projects.</p>	<p>register their interest in a solar buying scheme. Whilst the City Council wants to be supportive of renewable and low carbon energy schemes, the criteria in Policy CN5 are all of the factors that need to be taken into account when assessing a planning application. Recommended response: No change.</p>
<p>BHLF- KSAR- N8TG-J</p>	<p>We are very concerned by the implication that there is a requirement for a 6x increase in greenfield solar to 2,500 acres. It is clear from recent experience with proposals for large solar farms that renewable energy schemes can cause significant harm to landscape and the natural environment. So, we agree that specific policies in the new Plan are therefore needed if the Vision and Objectives for conservation and enhancement of the natural environment are not to be prejudiced. Greenfield solar may be beneficial for landowners and developers but there are significant costs to the community in terms of potential loss of heritage, landscape, amenity and tranquillity. There is also a loss in terms of the potential for land to mitigate climate change through natural sequestration. So, we would urge WCC to make clear that greenfield sites for utility scale solar will be the exception and not the rule, given the value of countryside for tourism, community, wildlife habitat, and carbon sequestration; and acknowledge the particular situation of the district in having limited available open space due to the SDNP and its setting. And that greenfield solar will never be acceptable on Best and Most Versatile Land (BMV) in acknowledgement of the food security crisis. In any</p>	<p>It is important that the LP is read as a whole. The National Planning Policy Framework (NPPF) makes it clear that local planning authorities need to set out a positive strategy for renewable energy schemes. Local communities have a responsibility to help increase the use and supply of green energy, but this does not mean that the need for renewable energy automatically overrides environmental protections and the planning concerns. As ever with planning there is always a planning balance with competing demands on land. Solar farms sit on the ground, the land can still be used for other purposes (sheep grazing) and they can at a later stage revert to use as agricultural land. The district does not have a wealth of previously developed land it is not considered appropriate to make the development of solar farms on greenfield land the exception. Recommended response: No change.</p>

	<p>event, it is not sufficient for proposals merely to demonstrate that they have "taken account" of the matters set out in the following sub paragraphs. This wording is carried over from the JCS but is no longer appropriate in the context of the much larger schemes being proposed today.</p> <p>We consider that proposals should only be permitted if they will cause "no significant harm to the landscape or visual amenity". The Plan Objectives seek conservation of the whole rural area, and we so we see no justification for confining protection only to "landscape and visual amenity of areas designated for their local, national or international importance, including their setting", although of course the threshold for significant harm will be lower in such areas.</p> <p>Because of their potential for significant harm, an LVIA should always be a requirement for large schemes. The new references to "setting" (notably of the national park) and cumulative impacts are welcomed. We would add to this list the specific need to protect tranquillity from the noise generated by solar farms.</p> <p>The Plan acknowledges the value of access to the countryside, which is mainly provided by public rights of way. The security fencing and towers around the site of solar energy schemes can cause significant harm to the enjoyment of nearby rights of way, in addition to the visual impact of the solar panels and other infrastructure. Accordingly, "visual and noise impacts on</p>	<p>Change wording in Policy CN5 to reflect this point. Please see response to BHLF KSAR N8T8-3 (page 3).</p> <p>Tranquillity would be assessed as part of the LVA/LVIA and as a result of this there is no need to include a separate criteria on this. Recommended response: No change</p> <p>PRoWs should be included/assessed within any LVA/LVIA. As this is the case and it is important to the read the LP as whole there no need to specify further – please see Policy NE14. Recommended response: No change.</p>
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<p>public rights of way" should be added to the subparagraphs.</p> <p>We would suggest a significant strengthening of policy to ensure a requirement for a specific benefit to local communities be demonstrated.</p> <p>We would urge a requirement to improve BNG rather than simply seek 'opportunities for environmental/wildlife enhancement'.</p> <p>Also, large solar energy schemes can take large areas of agricultural land out of food production which, in accordance with current Government policy, should not be permitted for the best and most versatile agricultural land (Grade 1 - 3b). This needs to be stated in the policy.</p> <p>We would encourage the Council to require all developers to provide a credible Full Life Cycle Carbon Budget so that the true, global, impact on climate change can be assessed against loss of landscape and land use.</p> <p>While welcoming the new requirement to demonstrate how materials on site will be recycled / reused if the site ceases to be operational, CPRE is very concerned that utility scale solar will become an industrial blight on the landscape when panels become redundant and there will be little prospect of restoration to previous productive land use without a financial incentive on the landowner. 'Restoration plans' not backed up with</p>	<p>Criteria v already requires applicants to demonstrate the benefit to host communities. Recommended response: No change</p> <p>The requirements of BNG (Policy NE5) apply to solar farms and as such it is important that the LP is read as whole. Recommended response: No change.</p> <p>Solar farms sit on the ground, the land can still be used for other purposes (sheep grazing) and can at a later stage revert to use as agricultural land it is not considered appropriate to be specific to rule out the best and most versatile land. Recommended response: No change</p> <p>A report has now been prepared as part of the LP Evidence Base that has identified the different options for tackling embodied carbon and how this can be addressed in the LP. Recommended response: See new policy on embodied carbon.</p> <p>Criterion xi has been specifically included in Policy CN5 to ensure that as part of the planning application process applicants includes details of a restoration plan. This would form part of the conditions of the planning permission. In view of this, it is not considered necessary to ask for a decommissioning bond as this would be an added completion that it is considered to be necessary. Recommended response: No change but include soil remediation plan, green infrastructure</p>
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	<p>financial penalties are inadequate. We strongly urge the Council to adopt the policy of other Authorities to require a legally enforceable Decommissioning Bond to ensure the land is returned to its original condition with ultimate responsibility on the landowner at time of decommissioning.</p>	<p>strategy and biodiversity needs to be enhanced as part of the restoration plan.</p>
<p>BHLF-KSAR-N8RZ-3</p>	<p>Any significant solar or wind energy schemes need to be carefully considered and proposals should only be allowed where they will cause no significant harm to the landscape or views. Therefore a Landscape and Visual Impact Assessment should be a statutory requirement for large schemes, irrespective of their location.</p> <p>The policy should require a quantifiable and specific benefit to local communities for any such scheme and avoid the loss of valued landscape and the best productive agricultural land.</p>	<p>Criteria ii of Policy CN5 requires a Landscape Visual Appraisal/Impact to be undertaken. Recommended response: No change.</p> <p>Criterion v does require applicants to demonstrate the benefit to host communities. Solar farms sit on the ground, the land can still be used for other purposes (sheep grazing) and can at a later stage revert to use as agricultural land it is not considered appropriate to be specific to rule out the best and most versatile land. Recommended response: No change</p>
<p>BHLF-KSAR-N87J-R Micheldever Parish Council</p>	<p>Energy schemes should not generate the need for transport of materials and as such should be sited at the / their “fuel” source.</p>	<p>A key consideration for renewable and low carbon energy generation schemes is that they need to be located on sites have a connection to the electricity grid network that has sufficient capacity to deal with the increase in electricity – being next to a fuel source is not the driving factor. Recommended response: No change</p>
<p>BHLF-KSAR-N8Z7-8</p>	<p>We recognise the need for renewable and low carbon energy schemes to help mitigate and tackle climate change. The delivery of such schemes within the setting</p>	<p>Support welcomes and comments noted.</p>

<p>South Downs National Park Authority</p>	<p>of the SDNP has the potential to erode landscape and rural character (i.e., boundary security fences, lighting, and views etc.). As such, we welcome the inclusion of Criteria (ii) and (iii) to ensure that energy proposals avoid any unacceptable impacts on landscape and visual amenity of designated areas (including the SDNP), along with the requirement for such proposals to be supported by Landscape Visual Impact Assessments.</p>	
<p>BHLF-KSAR-N86T-1 Hampshire County Council (Transport)</p>	<p>The County Council is pleased to see that the issue of climate change is being addressed via a range of policies to address strategic carbon neutrality and designing for low carbon infrastructure, alongside Policy T1 (Sustainable and Active Transport and Travel) and Policy T3 (Promoting sustainable travel modes of transport and the design and layout of parking for new developments) which consider transport issues. The County Council's Climate Change Framework for Strategic Programmes (2020 – 2025) sets out the mitigation and resilience programmes which the County Council will be pursuing. These strategic programmes have been designed to deliver outcomes to reach the County Council's targets in 2050 and are therefore very long term and extensive in nature. The County Council is therefore supportive of the Strategic Policy CN1 (Mitigating and adapting to climate change), Policy CN 2 (Energy Hierarchy), Policy CN 3 (Energy efficiency standards to reduce carbon emissions), Policy CN 4 (Water efficiency standards in new developments), Policy CN 5 (Renewable and low carbon energy schemes), Policy CN 6 (Micro energy generation schemes) and Policy CN 7 (Energy Storage)</p>	<p>Support welcomes and comments noted.</p>

	<p>which are all designed to help mitigate and adapt to climate change and which the County Council considers are all aligned with the key milestones set out in the building and infrastructure theme of the County Council's Climate Change Framework for Strategic Programmes.</p>	
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Comments which object to policy CN5 – renewable and low carbon energy schemes		
Respondent number	Comment	Officer comment
<p>ANON-KSAR-NKHU-7 Oliver's Battery Parish Council</p>	<p>Renewable energy schemes can cause significant harm to landscape and the natural environment. So, OBPC agree that specific policies are needed for conservation and enhancement of the natural environment.</p> <p>The generation of low carbon energy should be seen within the wider national context and the specific circumstances of the district, where 40% of the land is within SDNP. Any significant solar or wind energy schemes need to be carefully considered in the light of the loss of rare and valued landscape and best and most versatile agricultural land.</p> <p>Food supplies are a matter of national security and the potential loss of the best and most versatile agricultural land should explicitly state Grade 1 - 3b.</p> <p>Proposals should only be permitted where it can be</p>	<p>Support welcomes and comments noted.</p> <p>Solar farms sit on the ground, the land can still be used for other purposes (sheep grazing) and can at a later stage revert to use as agricultural land it is not considered appropriate to be specific to rule out the best and most versatile land. Recommended response: No change</p> <p>Change the wording of Policy CN5 to address this point. Please see response to BHLF KSAR N8T8 -3 page 3.</p>

	<p>demonstrated they will cause "no significant harm to the landscape or visual amenity". Because of their potential for significant harm, a Landscape and Visual Impact Assessment should always be a requirement for large schemes, irrespective of their location.</p> <p>Also, the policy should require a specific benefit to local communities be demonstrated.</p> <p>Like the brownfield first approach for new development, existing domestic, commercial and agricultural roof space should be prioritised over greenfield sites.</p>	<p>Criterion v already requires applicants to demonstrate the benefit to host communities. Recommended response: No change</p> <p>The district does not have a wealth of previously developed land. A study is being undertaken on the potential for roof top solar but in order to meet the council's climate emergency greenfield sites will be needed for solar farms. Recommended response: No change</p>
ANON-KSAR-NK6T-M	<p>There should be no solar farms on green fields. The solar farms should be integrated with all new build houses and industrial buildings. The land will be needed for future generations</p>	<p>The district does not have a wealth of previously developed land. A study is being undertaken on the potential for roof top solar but in order to meet the council's climate emergency greenfield sites will be needed for solar farms. Recommended response: No change</p>
ANON-KSAR-NK2H-4	<p>I support the policy in principle but am concerned that some greenfield sites that are not protected by National Park or other protected status may be used inappropriately, such as the open land adjacent to Oliver's Battery. This should be identified as Valued Landscape and protected from inappropriate installations.</p>	<p>Policy CN5 sets out the criteria that a planning application would need to meet. The issue of valued landscapes has been discussed and it is not a designation that the local planning authority wishes to pursue in this Local Plan. Recommended response: No change</p>

<p>ANON-KSAR-NKDQ-Y Shedfield Parish Council</p>	<p>This policy also includes solar farms. Our planning committee is against the use of solar panels on farm land. We are currently opposing a large Solar farm adjacent to our Parish.</p> <p>What we would like to see is that all new buildings either household or industrial have solar panels integral to their design together with ensuring other renewable sources are used in the development of these buildings.</p>	<p>Policy CN5 sets out the criteria that a planning application would need to meet.</p> <p>Policy CN3 (LETI energy efficiency standards) does require buildings to have PV panels. There is also a study underway to investigate the potential of roofs to accommodate PV panels. Recommended response: No change</p>
<p>ANON-KSAR-NKAP-U</p>	<p>Planning for low energy schemes should consider the full range of options. The importance of trees, habitat and rare landscapes should not be ignored. Larger developments such as Solar Farms and Wind farms should be considered not a compensations for housing developments but as important assets placed within the area in the least visually intrusive areas but in the context of overall need.</p> <p>Local communities should profit from theses development directly.</p> <p>The conservation of areas for food production should be clearly managed , assessed and provided for. The past time of pandemic has demonstrated the need for local provision of food.</p>	<p>Policy CN5 sets out the criteria that a planning application would need to meet and policy has been amended to reflect comments made. The issue of valued landscapes has been discussed and it is not a designation that the local planning authority wishes to pursue in this Local Plan. Recommended response: No change</p> <p>Criterion v already requires applicants to demonstrate the benefit to host communities. Recommended response: No change</p> <p>Solar farms sit on the ground, the land can still be used for other purposes (sheep grazing) and can at a later stage revert to use as agricultural land it is not considered appropriate to be specific to rule out the best and most versatile land. Recommended response: No change</p>

<p>ANON-KSAR-N8UA-D</p>	<p>Paragraph 4.39 17% should be changed to 100% this should be the aim!</p> <p>Paragraph 4.40 The potential for wind energy in the District should be activated.</p> <p>Community energy projects should be a priority</p>	<p>The 17% figure comes from a study called ‘Renewable Energy Study for Winchester District Development Framework’ in 2008 (page 4) which forms part of the evidence base to the LP.</p> <p>The two sentences proceeding this are also from this document. Both the landscape/topography are something that will not have changed since 2008. Recommended response: Add ‘2008’ after the words ‘A Renewable Energy Study’ in order to make it clear that paragraph 4.39 relates to this study and not the 2022 study.</p> <p>Support for community energy projects is given in paragraph 4.42. Recommended response: No change.</p>
<p>ANON-KSAR-NK1Z-N Shedfield Parish Council</p>	<p>We completely disagree that Winchester District should be aiming for a 6 fold increase to 2500 acres of land covered in solar panels. It is contrary to the government’s National Policy.</p> <p>The need for renewable energy does not automatically override environmental protections and the planning concerns of local communities. It is important that the planning concerns of local communities are properly heard in matters that directly affect them.</p> <p>Rather than include solar panels on new residential development, the policy should be towards ensuring industrial and commercial buildings, together with car</p>	<p>These figures come from research that was undertaken by Winchester Action on Climate Change to meet the council’s climate emergency. Recommended response: No change.</p> <p>Policy CN4 includes a range of criteria that planning applications would need to meet. Any planning applications would be published and there would be every opportunity for local communities to provide their comments. Recommended response: No change.</p> <p>The district does not have a wealth of previously developed land. A study is being undertaken on the potential for roof top solar but in order to meet the council’s climate emergency greenfield sites will be</p>

	<p>parks are hosts for these panels</p> <p>The trend towards installing panels on domestic properties may make other policies in the plan unachievable, for example achieving High Quality Design and Beautiful spaces</p>	<p>needed for solar farms. Recommended response: No change</p> <p>The High Quality Places SPD was adopted prior to the council's climate emergency and there are plans to update the SPD alongside the development of the LP. Recommended response: No change</p>
<p>ANON-KSAR-N8MH-C</p>	<p>I am generally very SUPPORTIVE of the policy but would like to ADD some elements for consideration thus :</p> <p>WDC to :</p> <p>a) maximise PV solar capacity instead of the 'number of PV panels' per se i.e. a presumption in favour of :</p> <p>i) new developments that incorporate preferred roof azimuth and slant</p> <p>ii) new and retrofits to incorporate a continuously improved catalogue of PV technology options</p> <p>iii) more aesthetically attractive PV options to be preferred over purely functional wherever feasible in order to preserve the visual appeal character of new and older established buildings</p> <p>WDC to :</p> <p>b) maintain an active watching brief on what the market has already established as well as newer cutting edge technologies and thus be able</p> <p>c) to incorporate both push and pull elements in district policies that govern design and construction rather than wait for third party incumbents to bring</p>	<p>The number of PV panels on a building will be dictated by a number of factors including the orientation of the building and the pitch of the roof. It is important to read the LP as a whole as there policies in the High Quality well designed places topic that require developers to consider the orientation of the building and the inclusion of renewable energy (Policy D1). PV technology is changing rapidly as there now a range of different options including having PV panels into roof tiles. Recommended response: No change</p> <p>Comments noted about the different sources of information.</p>

forward what they feel is best or have already negotiated

WDC to :

d) consider each of the following game changing candidate solutions as given below :

i) SOLAR ROOF TILES

<https://megasol.ch/en/match/>

<https://www.pv-magazine.com/2022/06/10/new-photovoltaic-in-roof-system-from-switzerland/?fbclid=IwAR2YUJ-TjUtLHzw-wx7cTRjZSc6KxzSM0nN3nvSq8d1J2hy1KLwrlGY7VI>
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https://pv-magazine-usa.com/2022/10/27/solar-tiles-connected-to-an-air-heat-pump/?fbclid=IwAR2tw2mW4-pRMfRNW7VIAPJQarYTH6ny8ypfsNFvBjjuDINCbplhyy_2lqg

ii) SOLAR WALLS / BALCONIES

<https://interestingengineering.com/innovation/ukrainian-vertical-solar-panels-balconies>

https://www.swissinfo.com/cis?fbclid=IwAR2orf8585I9_iMQtkNjuSU-SEHbEd5elbHEjY2nFrO187yo_m9eXE9AX0A

<https://www.pv-magazine.com/2021/11/17/the-solar-facade-with-a-golden-glow/>

https://ubiquitous.energy/?fbclid=IwAR02LPuks2LKGhdvT7tvUwwwnoInssZmAk4M6KUNXa_zf2sRDeHfCjyeecM

iii) SOLAR WINDOWS

https://www.independent.co.uk/tech/solar-panel-world-record-window-b2211057.html?fbclid=IwAR0fNu-tFZUCacZrRTLpg4mvHKxs8BN_yjWE2TrDRRyl8I3-XHf6bIR23pk

iv) AGRIVOLTAICS

<https://www.energymonitor.ai/sectors/industry/the-farmers-profiting-from-the-solar-power-boom>

<https://www.reuters.com/business/environment/solar-panels-help-french-winemaker-keep-climate-change-bay-2021-10-04/>

<https://interestingengineering.com/innovation/transparent-solar-panels-on-greenhouses>

v) SUPERMARKET CAR PARK SOLAR FARMS

https://www.theguardian.com/world/2022/nov/09/france-to-require-all-large-car-parks-to-be-covered-by-solar-panels?fbclid=IwAR1Zng7dkvPTf6Wb-LBu-auA60qlfKdMaNAw4_TNhYDy5sjC6dKUrdngUX4

	<p>https://www.pv-magazine.com/2022/06/10/new-photovoltaic-in-roof-system-from-switzerland/?fbclid=IwAR2YUJ-TjUtLHzw-wx7cTRjZSc6KxzSM0nN3nvSq8d1J2hy1KLwrlGY7VI</p> <p>vi) CIRCULAR ECONOMY</p> <p>https://interestingengineering.com/innovation/old-solar-panels-into-heat-harvesting-electricity</p> <p>vii) SUSTAINABLE PV PANEL CLEANING</p> <p>https://scitechdaily.com/mit-clever-way-to-clean-solar-panels-without-water/?fbclid=IwAR3GJT0u9qeCgnixc6rnsINO4omxsmjVM-RHBicZxsaCGGgzduMBVvtBwQQ</p>	
ANON-KSAR-N8YU-5	<p>Food supplies are a matter of national importance and the potential loss of the best and most versatile agricultural land should explicitly state Grade 1 - 3b.</p> <p>Proposals should only be permitted where it can be demonstrated they will cause "no significant harm to the landscape or visual amenity".</p> <p>Also, the policy should require a specific benefit to local communities be demonstrated.</p> <p>Like the brownfield first approach for new</p>	<p>Solar farms sit on the ground, the land can still be used for other purposes (sheep grazing) and can at a later stage revert to use as agricultural land it is not considered appropriate to be specific to rule out the best and most versatile land. Recommended response: No change</p> <p>Change the wording of Policy CN5 to reflect the comments. Please see response to BHLF KSAR N8T8 – 3 page 3.</p> <p>Criterion v already requires applicants to demonstrate the benefit to host communities. Recommended response: No change</p>

	<p>development, existing domestic, commercial and agricultural roof space should be prioritised over greenfield sites.</p>	<p>The district does not have a wealth of previously developed land. A study is being undertaken on the potential for roof top solar but in order to meet the council's climate emergency greenfield sites will be needed for solar farms. Recommended response: No change</p>
<p>ANON-KSAR-NKN1-9</p>	<p>The generation of low carbon energy should be seen within the wider national context. It is essential that the development of wind farms and Solar panel arrays take into account the need to protect the rare and valued landscape and best and most versatile agricultural land. Food production is a national strategic requirement.</p> <p>The council should encourage research into energy production and ensure all buildings are suitably equipped with energy generation and storage schemes. Further development of roofing tiles with solar generation built in should be used.</p>	<p>Solar farms sit on the ground, the land can still be used for other purposes (sheep grazing) and can at a later stage revert to use as agricultural land it is not considered appropriate to be specific to rule out the best and most versatile land. Recommended response: No change</p> <p>It is important that the LP is read as whole. Policy CN3 requires new development to meet the LETI energy efficiency standards. Solar tiles are one option that is available on the market as the demand increasing for solar energy hopefully, the cost of these will also come down. Recommended response: No change</p>
<p>ANON-KSAR-NKXV-R</p>	<p>I completely disagree with the premise that Winchester District should be aiming for a 6 fold increase to 2500 acres of land covered in solar panels. It is contrary to the government's National Policy.</p> <p>The National Planning Policy Framework explains that all communities have a responsibility to help increase the use and supply of green energy, but this does not mean that the need for renewable energy</p>	<p>These figures come from research that was undertaken by Winchester Action on Climate Change to meet the council's climate emergency. Recommended response: No change</p> <p>Policy CN4 includes a range of criteria that planning applications would need to meet. Any planning applications would be published and there would be</p>

<p>automatically overrides environmental protections and the planning concerns of local communities. As with other types of development, it is important that the planning concerns of local communities are properly heard in matters that directly affect them.</p> <p>Government guidelines on Renewables state that “the need, does not override environmental protections, concerns of local communities or the protection of local amenity, particularly in designated areas and near to AONB.”</p> <p>It states that ‘meeting our energy goals should not be used to justify the wrong development in the wrong location; not if we ride roughshod over the views of local communities. NPPF requires planning policies and decisions should contribute to and enhance the natural local environment, protecting and enhancing valued landscapes and sites of biodiversity – many solar proposals would destroy the local environment, landscape and biodiversity of the area.</p> <p>The Framework recommends that the Local Authority proactively identifies sites suitable for such industrial development and should not approve speculative applications if the impact is unacceptable. In Winchester, we should be looking at site allocation for solar in the same way that we do for housing allocation - with full consultation. And that speculative and unplanned development should be discouraged. The Government has consistently emphasised that they are no longer prioritising large scale solar farms. The UK Government Solar Strategy wishes to ‘move</p>	<p>every opportunity for local communities to provide their comments. Recommended response: No change.</p> <p>The district does not have any areas of land that designated as AONB. Recommended response: No change.</p> <p>Policy CN4 includes a range of criteria that planning applications would need to meet. Any planning applications would be published and there would be every opportunity for local communities to provide their comments. Recommended response: No change.</p> <p>A study is underway of the solar potential of rooftops for solar. The location of solar farms is in part dictated by the connection to the electricity grid network. Recommended response: No change.</p>
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the emphasis for growth away from large solar farms and instead focus on opening up the solar market for the UK's estimated 250,000 hectares of south facing commercial rooftops. In speaking about the Government's Energy White Paper, the housing minister stressed that solar panels should go on rooftops and brownfield sites. Recent reports by the UK Warehouse Association which has been presented to Government, found that, "We are failing to use the equivalent of 18,500 acres of land for solar power generation that could generate more than the 13.8TWh of electricity required in the UK renewable energy strategy." A link to their report can be found below.

The National Planning Policy Framework, (NPPF), para 148, states:

"The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.",
and in para 151: "To help increase the use and supply of renewable and low carbon energy and heat, plans should:
a) provide a positive strategy for energy from these

Policy CN5 has been drafted to align with the requirements in the NPPF and the latest guidance.
Recommended response: No change.

sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);”

and in para 152: “Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.”

In summary, the NPPF considers that renewable energy projects should be part of the Local Plan process, should not cause cumulative landscape or visual effects and that the only acceptable projects which are outside of Local Plan boundaries should be those supported by communities through the neighbourhood planning process.

Government policy does not support large scale solar at any cost.

Current government guidance for renewable and low carbon energy development (<https://www.gov.uk/guidance/renewable-and-low-carbon-energy>) states that:

“It is important to be clear that the need for renewable or low carbon energy does not automatically override environmental protections and the planning concerns of local people” A statement from Robert Jenrick, Secretary of State for Housing Communities and Local Government (16th August 2021) states: “The

	<p>National Planning Policy Framework expects local authorities to protect and enhance valued landscapes and sites of biodiversity and recognise the character and beauty of the countryside and the benefits of the best and most versatile farmland in their policies and decisions. A number of proposals for solar farms in the countryside have been rejected as causing visual harm, harm to amenity or harm to openness.... Local authorities should protect all that we value in landscapes and natural capital, as indicated above. Local planning authorities are asked to encourage re-use of brownfield land provided that it is not of high environmental value, to recognise the character and beauty of the countryside.”</p> <p>I therefore believe that this policy is wholly contrary to National Policy on solar. If we are to increase our solar provision within the District, development should be focussed on: Buildings, Brownfield Sites and only then Grade 5 land and then Grade 4 land. Solar panels in their current form are likely to become an obsolete technology in the lifetime of the plan (developments in the area of lightweight solar film, solar glass etc.). It is of course cheaper and easier for a developer to develop a greenfield site but the policy ought to reflect brownfield and poor quality land (ie. Grades 4 and 5) before quality agricultural land is used. We need to be careful that our policy does not tie us into a damaging loss of agricultural land and potentially an obsolete technology for the long term.</p> <p>The wording of the first line of the policy has a</p>	<p>Solar farms sit on the ground, the land can still be used for other purposes (sheep grazing) and can at a later stage revert to use as agricultural land it is not considered appropriate to be specific to rule out the best and most versatile land. Recommended response: No change</p> <p>Community energy schemes are explained in paragraph 4.42. Recommended response: No change</p> <p>The LVA/LVIA should be sufficiently objective to determine any harm to the landscape etc and should not consider whether renewable energy outweighs the harm. Recommended response: No change.</p>
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<p>grammatical error "demonstrated that it is community energy scheme" and has no definition of what a community energy scheme really means. Does this mean that it is owned by the community and delivers electricity to that community or does it mean that a developer has thrust £10k in the direction of the local Parish Council. It needs to be tightly defined.</p> <p>It should also be clarified that any need for renewable energy does not outweigh the policies relating to protection of landscape character, heritage, local amenity, noise etc. Not simply that they have been 'taken account of'.</p> <p>Policy CN5ii. It should not just be areas designated for their local or national importance that are protected. The Local Plan aims to protect the rural character of the whole district and therefore the policy should state "The need to avoid an unacceptable impact on landscape and visual amenity on local areas but particularly of...." A thorough LVIA should always be a requirement for these schemes because of their size and impact.</p> <p>The connection to the electricity network has been demonstrated in planning precedent NOT to be a factor in the determination of renewable energy schemes:</p> <p>In the 2 appeal judgements for a solar farm in Cambridgeshire (APP/W0530/W/15/3012014 & APP/W0530/W/15/3013863), the Secretary of State</p>	<p>It is important to read the LP as a whole. There are countryside policies in the LP and a range of other policies that any planning application would need to be in accordance with. Recommended response: No change.</p> <p>Whilst two appeal decisions have been quoted in this representation whereby the proximity of the electricity network has not been a factor, we are also aware of a number of appeal decision where the opposite position has been taken by an Inspector. In these cases, weight has been given in these appeal decision (e.g. Bramley, Basingstoke, Chelmsford Essex) to the grid connection and the Inspector noted that a solar farm requires grid capacity and viable connection in order to be able to operate. In addition to this site selection process should specify the reasons and the rational for selecting the site and one of the factors is the connection to the grid. The National Policy Statement EN3 has identified this as a critical issue (see paragraphs 2.48.11 and 2.48.12) and in view of this is recommended that this criteria remains. Recommended response: No change.</p>
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<p>notes:</p> <p>At paragraph 19 of the Decision Notice “The Secretary of State agrees with the Inspector that no weight attaches to the assertion that a connection to the national grid is an essential site requirement.”</p> <p>At paragraph 48 of the Planning Inspector’s report “The benefits of a connection to the grid are noted but this is one of many development constraints that a developer has to take into account and should not be afforded weight.”</p> <p>At paragraph 49 of the Planning Inspector’s report “No weight should be attached to [inter alia] the availability of a grid connection.”</p> <p>At paragraph 76 of the Planning Inspector’s report “A connection to the national grid is an essential site requirement and the availability of a connection in a part of the network with capacity to accept the output is of assistance to the appellant but it does not bring a public benefit and adds no weight to the planning case for the proposals.”</p> <p>Battery Storage This is very new and unregulated technology. Health and Safety England are not currently regulating large scale battery storage units. There have been a number of large scale fires at these sites across the world including one in Liverpool and a number in America and Australia. They have caused serious</p>	<p>Criteria x requires an emergency plan for the battery storage facility to address the risk of fire. Recommended response: It would be useful to add the words ‘any potential contamination run off’ to pick up on the point that has been made in this representation.</p>
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and life changing injuries to firefighters. If a battery goes into a chemical thermal runaway it is not a normal fire cannot simply be extinguished with foam/fire suppressing chemicals or water. Extremely toxic gases are given off (hydrogen fluoride amongst others). They are generally cooled with excessive quantities of water (1900l/minute is the recommended amount) and left to burn out. The water cooling is to try to prevent the spread of heat to neighbouring units. These batteries are industrial and should not be sited on greenfield sites. They certainly should not be sited near properties or people. They should also not be sited next to rivers or where there is a risk of contaminated run off. High volume water supply must be near them. Commercial insurers are becoming less prepared to insure large scale BESS facilities because of the dangers.

We can supply plenty of scientific research reports that give more information about the risks from BESS.

Batteries also only generally give 1 or 2 hours of back up power. Unfortunately solar power only works in daylight hours so it doesn't really produce power when we need it (ie. early mornings and evenings with a greater requirement for electricity generation in the winter). Storage is therefore really an essential component of a solar generation (in the UK) BUT to have sufficient storage, we would need acres and acres of batteries. And batteries are EXTREMELY bad for the planet in terms of their carbon requirement. A Cranfield University study of a battery

Points noted. **Recommended response:** No change.

Points noted. **Recommended response:** No change.

	<p>and solar plant has demonstrated that it will be net carbon positive over its lifetime. (https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010106/EN010106-004294-DL2 - Say No To Sunnica Action Group Ltd SNTS Written Representation Annex F - Carbon_Redacted.pdf)</p> <p>Solar is an inefficient and intermittent energy source in this country. It is only around 11% efficient, whereas offshore wind turbines on average harness 60% of the energy that passes through them. Data regularly shows that for a significant proportion of the year, solar can only provide a tiny percentage of our energy needs – so insignificant that it barely shows on a data graph.</p> <p>Further evidence that the government is not supportive of large scale solar at any cost:</p> <p>Overarching National Policy Statement for Energy EN-1 (July 2011) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/47854/1938-overarching-nps-for-energy-en1.pdf</p> <p>s.3.4.3 states: Future large-scale renewable energy generation is likely to come from the following sources: Onshore wind Offshore wind Biomass</p>	<p>It is important to read the LP as a whole. Recommended response: No change.</p> <p>Points noted. Recommended response: No change.</p>
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<p>Energy from waste Wave and Tidal</p> <p>s.5.9.14 states: Outside nationally designated areas, there are local landscapes that may be highly valued locally and protected by local designation. Where a local development document in England or a local development plan in Wales has policies based on landscape character assessment, these should be paid particular attention.</p> <p>Energy White Paper Dec 2020 https://www.gov.uk/government/publications/energy-white-paper-powering-our-net-zero-future Para.17 states: We will ‘Safeguard our cherished landscapes and restore habitats for wildlife in order to combat biodiversity loss...’</p> <p>Draft Overarching National Policy Statement for Energy EN-1 (September 2021) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1015233/en-1-draft-for-consultation.pdf s.3.3.23 acknowledges that: ensuring affordable system reliability, today and in the future, means wind and solar need to be complemented with technologies which supply electricity, or reduce demand, when the wind is not blowing, or the sun does not shine. S5.10.16 repeats the attention that should be paid to protected local landscapes, originally found in EN-1 (2011): Outside nationally designated areas, there are</p>	<p>Points noted. Recommended response: No change.</p>
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	<p>local landscapes that may be highly valued locally and protected by local designation. Where a local development document in England or a local development plan in Wales has policies based on landscape character assessment, these should be paid particular attention.</p> <p>Govt Energy Consultation EN3 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1015236/en-3-draft-for-consultation.pdf (2.51.7) “The Secretary of State will consider visual impact of any proposed solar PV farm, taking account of any sensitive visual receptors, and the effect of the development on landscape character, together with the possible cumulative effect with any existing or proposed development.” This planning application was unanimously refused by the planning committee because: “The proposals would result in a detrimental change to the quality of the strategic landscape, failing to conserve and enhance the character of the landscape around the Shropshire Hills Area of Natural Beauty. This would result in significant harm to the character of the area and thus impact on the enjoyment of the area by receptors using the local public rights of way. The proposed mitigation is insufficient to overcome these harms.”</p> <p>Energy Security Strategy 2022 https://www.gov.uk/government/publications/british-energy-security-strategy/british-energy-security-</p>	<p>Points noted. Recommended response: No change.</p> <p>Points noted. Recommended response: No change.</p>
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<p>strategy</p> <p>Continues the protection of community consultation and designated, protected landscapes, whilst encouraging roof mounted solar, stating: “There is currently 14GW of solar capacity in the UK split between large scale projects to smaller scale rooftop solar. The cost of solar has fallen by around 85% over the past decade and can be installed in just one day on a domestic roof. We expect a five-fold increase in deployment by 2035 For ground-mounted solar, we will consult on amending planning rules to strengthen policy in favour of development on non-protected land, while ensuring communities continue to have a say and environmental protections remain in place.”</p> <p>Net Zero Strategy 2021 The Government’s Net Zero Strategy published in October 2021 makes it clear that it aims to protect, enhance, and make our natural environments more diverse. Through the Environment Bill it will also legislate for Local Nature Recovery Strategies, improving and creating habitats for nature and wider environmental benefits, helping to deliver net zero objectives.</p> <p>The Strategy does not encourage the development of large scale, industrial, solar energy projects, the likes of which are currently threatening our green spaces and farmland all over the UK. It supports community led solar projects, in the right locations, where there is</p>	<p>Points noted. Recommended response: No change.</p> <p>Points noted. Recommended response: No change.</p>
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<p>direct community benefit and power produced is used within the local area, not sold back to the grid for the sole financial benefit of the developer.</p> <p>The clear focus of all Government documents on renewable energy prioritises wind (mainly offshore), hydrogen, carbon capture and storage and small modular reactors.</p> <p>The Chancellor has confirmed the construction of the new nuclear power plant at Sizewell C in Suffolk, with contracts recently agreed.</p> <p>Rolls Royce’s planned roll out of small modular reactors on four priority sites would also generate up to 15GW of stable, reliable low carbon energy and take up 1,000 times less land than a solar project. They will be built on existing, decommissioned sites and not affect our landscapes or food security.</p> <p>NPPF advises that proposals in National Parks and Areas of Outstanding Natural Beauty, and in areas close to them where there could be an adverse impact on the protected area, will need careful consideration as the deployment of large-scale solar farms can have a negative impact on the rural environment, particularly in undulating landscapes. The guidance also includes two ministerial quotes, parts of which I have shared in full below: “As the solar strategy noted, public acceptability for solar energy is being eroded by the public response to large-scale solar farms which have sometimes been sited insensitively. Meeting our energy goals should</p>	<p>A report has now been prepared as part of the LP Evidence Base that has identified the different options for tackling embodied carbon and how this can be addressed in the LP. Recommended response: See new LP policy on embodied carbon.</p> <p>Points noted. Recommended response: No change.</p> <p>It is important that the LP is read as whole. Recommended response: No change</p>
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	<p>not be used to justify the wrong development in the wrong location and this includes the use of high-quality agricultural land. Protecting the global environment is not an excuse to trash the local environment.” “We don’t want solar to become a bone of public contention like onshore wind. And that is my key message today. Solar is a genuinely exciting energy of the future, it is coming of age, and we want to see a lot, lot more. But not at any cost... not in any place... not if it rides roughshod over the views of local communities. As we take solar to the next level, we must be thoughtful, sensitive to public opinion, and mindful of the wider environmental and visual impacts.”</p> <p>By focussing on solar with batteries as 'the solution' to the District's carbon problem, we are kidding ourselves if we believe that this will in fact be carbon negative or even neutral. We will be adding to the carbon burden of the planet. It could completely undermine our objective of being a carbon neutral district. We cannot ignore the issue of embodied carbon simply because it is inconvenient. We will also be risking the safety of our firefighters and the wellbeing of nearby residents if we allow battery storage.</p> <p>It is possible that other forms of storage will be developed over the lifetime of the plan (hydrogen storage, heat storage etc.) but tying ourselves to a prescribed solution in the Local Plan - particularly one</p>	<p>Points noted. Recommended response: No change.</p> <p>Solar farms sit on the ground, the land can still be used for other purposes (sheep grazing) and can at a later stage revert to use as agricultural land it is not considered appropriate to be specific to rule out the best and most versatile land. Recommended response: No change</p> <p>A study is underway of the solar potential of rooftops for solar. Recommended response: No change.</p>
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<p>where there is evidence that it will in fact ADD to the carbon burden of the planet is short sighted.</p> <p>The management plan should do more than identify the opportunities for environmental enhancement. It should be a requirement that there is a biodiversity net gain and that the site is monitored and applicants held to account for delivering the gain.</p> <p>This policy has failed to recognise that greenfield sites already sequester a lot of carbon and that the infrastructure of large new solar sites will reduce the site's original sequestration (through compaction of soil, reduced levels of growth around and under panels, coppicing of trees around the sites that act as a carbon sink, increased run off of topsoil from the site etc.)</p> <p>Any loss of BMV land should be prohibited. There is evidence emerging that in dry years, Grade 3b land (moderate) is often MORE productive than Grades 2, 3a and sometimes even Grade 1 land because of its ability to retain moisture in the soil. No account has been taken in this policy of the loss of agricultural land in terms of food miles and food security (more on this point later). Previous environment secretaries (George Eustice and Ranil Jayawardena) have asked their officials to redefine BMV to include Grade 3b land. In a warming planet, land which can retain more moisture will be increasingly important for agricultural production. We should not be risking our food security for the short term interests of off-shore based</p>	<p>It is important that the Local Plan is read as whole. Policy D7 in the Local Plan refers to the requirements for mitigating noise. Recommended response: No change.</p>
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<p>investment funds. Solar should go on roof tops, brown field sites and only when those are exhausted, should they be put on Grade 5 and then 4 agricultural land.</p> <p>The UK Warehousing Association has produced an excellent report detailing how warehouse rooftops could deliver the full amount of solar generation that the UK Government has said it is aiming for. A link to this report can be found here: https://www.ukwa.org.uk/wp-content/uploads/2022/09/Investment-Case-for-Rootop-Solar-Power-in-Warehousing-August-2022.pdf France has mandated solar panels on all of its carparks (new and existing). This would be a visible change that WCC could make: https://www.theguardian.com/world/2022/nov/09/france-to-require-all-large-car-parks-to-be-covered-by-solar-panels</p> <p>Italy puts solar panels alongside motorways: https://www.autobrennero.it/en/sustainability/photovoltaic/</p> <p>Cambridge is putting them on its hospitals: https://www.cuh.nhs.uk/news/building-begins-for-new-solar-energy/</p> <p>We also ought to be requiring solar panels to be RoSH compliant. This is a European electrical equipment standard that means that panels can be safely recycled at the end of their life. Without this commitment, the panels are difficult or impossible to</p>	<p>Criterion xi has been specifically included in Policy CN5 to ensure that as part of the planning application process applicants includes details of a restoration plan. This would form part of the conditions of the planning permission. In view of this, it is not considered necessary to ask for a decommissioning bond. Recommended response: No change.</p> <p>It is important that the LP is read as a whole – there are a number of other policies on heritage assets/archaeological assets. Recommended response: No change.</p> <p>Agree the title could be potentially misleading. Recommended response: remove the title above paragraph 4.36 ‘Retrofitting to reduce carbon emissions’.</p> <p>Points noted. Recommended response: No change.</p>
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	<p>recycle (we note that there is currently no UK facility for recycling any solar panels) and they may well end up in landfill.</p> <p>There is no mention of noise in this policy. Whilst the solar panels themselves do not make noise, the essential infrastructure that comes with them can be extremely noisy, Inverters, Transformers, Substations and Batteries. We should add in that there must be no noise impact outside the boundary of the site as a minimum - whilst noting that low frequency sound can be very intrusive and travels further, Noise can also have a significant and detrimental effect on wildlife. Tranquillity as a characteristic of the countryside has been strengthened in the NPPF in recent years and it appears to be missing here.</p> <p>Without a legally enforceable and fully funded decommissioning bond for site restoration at the end of their life, there is a real risk that utility scale solar developments become a blight on our landscape as the technology becomes obsolete and the costs for recycling and removal of infrastructure increase. These sites are owned and managed by offshore based investment funds who are not currently putting aside any money for site decommissioning. It should be a requirement not only that the infrastructure (above and below ground) is removed but the site is fully restored to its previous use. For agricultural land, this should include a soil restoration plan as it is likely that the compaction of the soil by machinery and increased water run off will have degraded the</p>	
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<p>agricultural land use class that it started with.</p> <p>There is no mention of preserving archeological assets.</p> <p>The introduction to this policy talks extensively about retrofitting buildings with energy efficient measures and yet the whole of this policy is about installing large utility scale solar developments across our productive (and carbon sequestering) countryside. It completely ignores the issues of embodied carbon and completely ignores the fact that solar energy when installed on greenfield sites (rather than roof tops where energy is used as it is produced) provides power at exactly the times of day and year when the country least needs it. It is at odds with the government guidance on large scale solar and the NPPF.</p> <p>We also note that in none of the utility scale solar developments planning applications put forward to date in the district has the applicant provided a quantified and full calculation for the carbon cost and saving for the renewable energy. If a developer had evidence that their development was bringing a clear carbon saving, then you would expect that they would be shouting it from the rooftops. Their silence on this subject says much. In order to really become a carbon neutral District, we must take an EVIDENCE BASED approach to carbon reduction and not simply</p>	<p>Points noted. Recommended response: No change</p>
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a hopeful one. Where there has been some independent study of the carbon burden of large scale schemes by academics, the conclusion is that at best the schemes are perhaps mildly carbon beneficial but particularly where battery storage is included, the schemes can be significantly net carbon positive for the planet. The heavy loss of productive farmland and land available for carbon sequestration is a high price to pay. Only today (13th December 2022), the House of Lords Land use in England Committee report published on 13th December 2022 (<https://committees.parliament.uk/publications/33168/documents/179645/default/>) concluded:

"Although there are provisions within the NPPF to dissuade the development of solar farms on Best and Most Versatile land, from the evidence received we are concerned that too many exceptions are being made. We believe that a consistent policy toward encouraging the installation of solar panels on industrial, commercial and domestic buildings is needed and would negate the need for large- scale ground mounted solar farms. Alongside that, we would like to see stricter regulations put in place to prevent the development of solar farms on BMV land. We also believe onshore wind turbines still have a crucial role to play in achieving national energy self-sufficiency.

133. Energy and other large-scale infrastructure projects should be incorporated into a land use framework. The Land Use Commission would be

	<p>tasked with doing this in close cooperation with relevant bodies including the National Infrastructure Commission."</p> <p>It is clear that WCC policy is diverging from governments national policy and direction on large scale ground mounted solar farms. We also understand that WCC has CUT the budget for retrofitting energy saving measures and solar installations on existing properties, diverging even further. This must risk the Local Plan not being accepted for adoption.</p>	
ANON-KSAR-N8XP-Y	Hampshire and especially Winchester have wonderful landscapes and views and these could easily be ruined by inappropriate siting of solar panels, wind farms etc and their adoption needs very careful planning with local residents and PCs. Valuable agricultural land must not be sacrificed.	Policy CN5 has a number of criterion that would need any planning application to meet. It is important to read the LP as whole as there are a number of other policies included in the topic Biodiversity and the natural environment. Recommended response: No change
ANON-KSAR-N83B-C	Para 4.40 Please add a further bullet point: "It would additionally require the potential for wind energy that exists within the District to be activated, as outlined in the Study."	The landscape and the topography conclusions that are contained in the 2008 will not have altered since 2008 'A Renewable Energy Study' and in this respect, it is considered not appropriate to include these recommendations. Recommended response: No change.
ANON-KSAR-NKKV-B	Renewable energy in the form of solar panels, wind turbines or heat pumps should not have restrictions imposed any more than other forms of land use subject to national laws. There should be a presumption of approval of these schemes. For more information on renewable energy potential in Winchester District see	Due to the scale and location of solar farms it is important to a LP policy that clearly identifies the criteria that a planning application would need to be assessed against. Recommended Response: No change.

	<p>https://www.winacc.org.uk/wp-content/uploads/2022/02/winacc-energy-report-2022-final.pdf</p> <p>Responses to some of the numbered paragraphs:</p> <p>i. loss of agricultural land is a spurious issue given the land area occupied by renewable energy schemes. Livestock farming in contrast has significant emissions.</p> <p>ii. The visual appearance of renewable energy schemes is subjective and the installations are easily removed should the energy outlook improve.</p> <p>iii. The impact on the built environment and biodiversity of renewable energy installations are small. This criterion should be presumed to be satisfied unless exceptional circumstances can be demonstrated. In particular the impact is tiny compared with the impact of housing, livestock farming, or intensive farming.</p> <p>v. Benefit to host communities should generally be presumed to apply although preference should be given to local investors.</p> <p>vi. Any management plan requirement should be no more than for any other land use requirement.</p>	<p>Criterion i is requiring applicants to take into account the potential loss of the best and versatile agricultural land. It is accepted that livestock farming creates emissions but this is not an issue that can be addressed by the LP. Recommended Response: No change</p> <p>Renewable energy schemes do have a visual impact on the landscape and tend to by their nature be in place for a number of years. Recommended Response: No change</p> <p>As above.</p> <p>Unsure how this could be achieved/role of LP. Recommended Response: No change</p> <p>Requiring a management plan is considered to be important as a solar farm is entirely different to other land uses. Recommended Response: No change</p> <p>Change – delete criteria 5.</p>
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	<p>vii. It is not clear how proximity to biomass plants, fuel sources and transport links is relevant to wind or solar renewable energy installations.</p> <p>viii. Again it is not clear why these installations should incur more restrictions than any other installation.</p> <p>ix. Again - surely this an issue for any installation - it is not clear why there should be additional restrictions for renewable energy installations.</p> <p>xi. There should be no presumption of reversion to the previous use any more than there is for any other installation.</p>	<p>Given the size of renewable and low carbon schemes combined with the fact that they are usually in the countryside it is considered appropriate to ensure that the lighting is restricted to emergency use only. Recommended response: No change.</p> <p>Solar farms are different to other land uses as they only sit on the land. If they are no longer needed it is considered important to have a plan in place to cover their removal. Recommended Response: No change</p>
ANON-KSAR-N81B-A	<p>Policies need to be in place to protect the potential loss of the best and most versatile agricultural land - Grade 1 - 3b. Food production should outrank solar farms.</p> <p>Much harm can be done to landscape character, and tranquility by siting solar farms in areas of rare and valued landscape. Long distance views should be protected from solar and wind farms. Landscape and Visual Impact Assessment should be required for large schemes to prevent harm to the landscape and visual amenity. Just as brownfield land should be used before green field land, then existing domestic and commercial and agricultural roof space, including car park roofing schemes before using greenfield sites.</p>	<p>Solar farms are different to other land uses as they only sit on the land. If they are no longer needed it is considered important to have a plan in place to cover their removal. Recommended Response: No change.</p> <p>The wording of Policy CN5 includes the requirement for a Landscape and Visual Impact Assessment. The district does not have a wealth of previously developed land. A study is being undertaken on the potential for roof top solar but in order to meet the council's climate emergency greenfield sites will be needed for solar farms. Recommended Response: No change.</p>

<p>ANON-KSAR-N8WC-H</p>	<p>Major solar or wind energy schemes must be carefully considered and should not threaten rare and valued landscape as well as good and useful agricultural land.</p> <p>Food supplies are a matter of national security and the potential loss of the best and most versatile agricultural land must state Grade 1 - 3b.</p> <p>A Landscape and Visual Impact Assessment should always be a requirement for large schemes, regardless of location.</p> <p>As with brownfield first approach for new development, existing domestic, commercial and agricultural roof space should be prioritised over greenfield sites.</p>	<p>Planning is always a balance. Solar farms sit on the ground, the land can still be used for other purposes (sheep grazing) and can at a later stage revert to use as agricultural land it is not considered appropriate to be specific to rule out the best and most versatile land.</p> <p>Recommended response: No change</p> <p>Criteria ii requires the submission of Landscape Visual Appraisal/Impact Assessment. Recommended response: No change</p> <p>The district does not have a wealth of previously developed land. A study is being undertaken on the potential for roof top solar but in order to meet the council's climate emergency greenfield sites will be needed for solar farms. Recommended response: No change</p>
<p>ANON-KSAR-N884-3</p>	<p>For a Plan that sets Climate Emergency at the center of its policies, the ambition for renewable energy generation in the area is pitiful.</p> <p>Ref section 4.39, What are we aiming to achieve - as drafted this is section is a missed opportunity and appears to be written to specifically discourage wind energy schemes because it implies that onshore wind turbines are only possible in the National Park. There are however many sites in areas outside of the National Park which would be very suitable for one or a small cluster of modern wind turbines. If the planning consent for such projects is linked to community benefit (a policy you do state and which I</p>	<p>The study is based on evidence and reflects the topography of the district and the fact that the highest parts of the district are located in the SDNP. It is not saying that a planning application for wind turbines would be refused. Recommended response: No change</p>

	<p>agree is essential) then there is strong evidence that many local people will support this – more so now that we have a cost of living crisis linked to high (fossil fuel) energy.</p> <p>This section 4.39 and others should therefore include very clear statements of intent to drive the introduction of all types of renewable energy schemes in the area with encouragement to developers and rural property owners</p> <p>Regarding district heating, I agree fully with the policy in 4.44, but it should be very specific that all major house developments MUST incorporate District Heating. Barton Farm was awarded planning consent (by the last Conservative council) without a requirement for District Heating – this must be correct with a requirement to implement this on later sections of development.</p>	<p>The LP has been framed in a positive way and as ever with planning it is always a balance between competing demands. Recommended response: No change</p> <p>Points noted. The whole of Kings Barton has already been granted outline planning consent. Discussions are taking place with the developers about whether there are any opportunities to improve the carbon footprint of the development but as O/L consent has been granted this is outside of the remit of the LP. Recommended response: No change</p>
<p>BHLF-KSAR-N8BQ-A</p> <p>Historic Environment Link here</p>	<p>Criterion ii in policy CN5 would be strengthened and clarified if it refers also to significance as the key point of interest regarding the historic environment.</p> <p>We suggest potential wording for consideration, also acknowledging the distinction between Landscape Visual Impact Assessment (LVIA) and assessment of setting impacts. The distinction between these two types of assessment is noted in our Advice Note on commercial renewable energy development. In most cases, based on the approach to heritage statements outlined in policy HE2, a heritage statement will suffice. But we flag there may be a need for an</p>	<p>Recommended Response: Change. The wording of Policy CN5 has been updated to take on board the comment.</p> <p>Recommended Response: Change. The wording of Policy CN5 has been updated to take on board the comment.</p>

	<p>assessment of setting impacts as an additional, focused piece of work for certain major schemes.</p> <p>by undertaking a Landscape Visual Appraisal/Impact Assessment. Where there is potential for adverse impacts on the significance of heritage assets (including the contribution to that significance made by their setting), a heritage statement will be required in accordance with policy HE2, informed by liaison with the Council's historic environment services. For large-scale schemes, an assessment of setting impacts may also be required. conservation areas and heritage assets, including their setting by undertaking a Landscape Visual Appraisal/Impact Assessment;</p>	
<p>BHLF-KSAR-N8TG-J</p>	<p>We strongly support the proposed policies relating to Carbon Neutrality, subject to our remarks below.</p> <p>We have a general concern that the consultations Plan is too quick to adopt the easy approach of a significant expansion of greenfield solar generation, without acknowledging the costs in terms of loss of carbon sequestration potential and loss of quality of landscape to the District, its visitors and residents.</p> <p>We are also concerned the Authority believes it has 'an important promotional role in terms of encouraging renewable energy proposals to come forward for development' and would wish the</p>	<p>Support welcomed and comments noted.</p> <p>Points noted. However, it is important for the LP to clearly set out the criteria that a planning application would need to meet. Recommended Change: No change.</p> <p>It is important that the LP is read as whole. Recommended response: No change.</p>

	<p>Authority to hold in better balance its important role in protecting and enhancing the countryside, as a resource for all residents, an asset for visitors and tourism, a vital part of the history and heritage of the District and as a key part of maximising carbon sequestration, which is only partially addressed in Policy NE4.</p> <p>We recognise the rapid development of technology in this sphere, particularly in terms of lightweight PV films and glass, but are concerned that promoting the development of technology that may rapidly become redundant risks causing damage to the District's countryside for a short term gain.</p> <p>Redundant because an increasing proportion of UK energy is now sourced from offshore wind, and this will increase rapidly. So, it is not necessary for Winchester to sacrifice large tracts of valued and valuable landscape. We face a significant food crisis at the same time as climate crisis and it is vital for us to protect our productive land rather than unthinkingly cover it with solar development.</p>	<p>Solar farms are by their very nature not permanent features on the landscape as they sit on the land.</p> <p>Recommended response: No change</p>
BHLF-KSAR-N8TB-D	<p>Promoting renewable energy projects is a laudable aim but the focus of CN5 is wrong. Some expansion of greenfield solar is sensible: the South Lynch project in Hursley Parish is an example of a good project largely tucked away from creating large visual damage to the landscape. But a 6 fold expansion would be much better achieved by using brownfield sites, roof tops, commercial premises</p>	<p>The district does not have a wealth of previously developed land. A study is being undertaken on the potential for roof top solar but in order to meet the council's climate emergency greenfield sites will be needed for solar farms. Recommended response: No change</p>

Comments from other policies

<p>ANON-KSAR-N819-1</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 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>	<p>Solar farms sit on the ground, the land can still be used for other purposes (sheep grazing) and they can at a later stage revert to use as agricultural land. The district does not have a wealth of previously developed land it is not considered appropriate to make the development of solar farms on greenfield land the exception. Recommended response: No change.</p>
<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>Solar farms sit on the ground, the land can still be used for other purposes (sheep grazing) and they can at a later stage revert to use as agricultural land. The district does not have a wealth of previously developed land it is not considered appropriate to make the development of solar farms on greenfield land the exception. Recommended response: No change.</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.	
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	Recommendations	Officer response
Comments from SA/HRA	Policy CN5 already includes the requirement for lighting at developments for renewable and low carbon energy to be restricted to emergency use only and that development should avoid or mitigate adverse effects on neighbouring uses. However, the policy could be strengthened by requiring that any light and noise pollution that might otherwise impact residential amenity should be appropriately mitigated.	Policy CN5 now includes the criteria for renewable and low carbon proposals to demonstrate that it will integrate with existing or new/planned development and measures have been incorporated to avoid or mitigate adverse effects including those on neighbouring uses.

Amendments to supporting text

Remove the title above paragraph 4.36 '**Retrofitting to reduce carbon emissions**'.

Paragraph 4.39 Add '**2008**' after the words 'A Renewable Energy Study' in order to make it clear that paragraph 4.39 relates to this study and not the 2022 study.

Page 51 - In order to avoid any potential confusion remove the heading at the top of the page '**Community Energy Schemes**'.

Amendments to CN5

~~Development proposals for the generation of renewable and low carbon energy will be supported especially where it can be demonstrated that it is community energy scheme. When assessing proposals for the generation of renewable and low carbon energy proposals should demonstrate how they have taken account of the following:~~

~~i. The potential loss of the best and most versatile agricultural land;~~

- ii. ~~The need to avoid an unacceptable impact on landscape and visual amenity of areas designated for their local, national or international importance, such as the South Downs National Park (including its setting), conservation areas and heritage assets, including their setting by undertaking a Landscape Visual Appraisal/Impact Assessment;~~
- iii. ~~The location, scale, design and other measures to avoid or mitigate any adverse effects on the built environment, biodiversity, landscape and neighbouring uses in terms of cumulative impacts;~~
- iv. ~~Potential to integrate with new or existing development, whilst avoiding harm to existing development and communities;~~
- v. ~~Benefits to host communities;~~
- vi. ~~A management plan that identifies the opportunities for environmental/wildlife enhancement;~~
- vii. ~~Proximity to biomass plants, fuel sources and transport links;~~
- viii. ~~Restricting lighting to emergency use only;~~
- ix. ~~Connection to the electricity network;~~
- x. ~~An emergency plan for the battery storage facility to address the risk of fire; and~~
- xi. ~~The need to demonstrate through the submission of a restoration plan how the materials on the site will be recycled/re-used if the site reverts to its former use as a result of the proposal ceasing to be operational.~~

Updated Policy CN5

Development proposals for the generation of renewable and low carbon energy will be supported.

When assessing proposals for the generation of renewable and low carbon energy proposals applicants must demonstrate:

- i)** That the scheme has considered and assessed any potential loss of the best and most versatile agricultural land;
- ii)** Any benefits of the proposal to host communities and how this will be secured and distributed;
- iii)** How the scheme, scale and layout has been integrated with any existing or new/planned development and measures have been incorporated into the scheme to avoid or mitigate any adverse effects on the built environment, biodiversity, landscape and neighbouring uses in terms of cumulative impacts;

- iv) That there are no adverse impacts on the significance of heritage assets (including the contribution to that significance made by their setting) and where appropriate, submit a heritage statement in accordance with policy HE2, which is informed by liaison with the Council's historic environment services;
- v) That there is no significant adverse impact on the landscape character or visual amenity having regard to any mitigation, by undertaking a Landscape Visual Appraisal or a Landscape Visual Impact Assessment;
- vi) That in the management plan the measures that the scheme has incorporated for environmental/wildlife enhancement and nature-based solutions;
- vii) There is capacity to connect the proposal to the electricity network;
- viii) That lighting has been restricted to emergency use only;
- ix) That in the emergency plan the measures to ensure that any energy storage facility has addressed the risk of fire and any potential contamination run off; and
- x) ~~The~~ **That** in the restoration plan details are provided of how the materials on the site will be recycled/re-used and there is a soil remediation plan and strategy that identifies what landscape/biodiversity features should be retained and enhanced in perpetuity if the site reverts to its former use as a result of the proposal ceasing to be operational.