

NE1- protecting and enhancing biodiversity and the natural environment in the district

- Support - 44
- Neither support of object - 16
- Object – 23

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 which support NE1- protecting and enhancing biodiversity and the natural environment in the district		
Respondent number	Comment	Officer comment
WCC Landscape (sdd)	Sometimes the 'intrinsic character and beauty of the countryside' is given little weight in planning decisions, particularly if what is being proposed has clear community benefits such as affordable housing or renewable energy development. Character and beauty are often seen as merely subjective qualities which can be put aside in favour of more objective & quantifiable benefits. This underplays the role character and beauty have in people's quiet enjoyment of their surroundings and the contribution they frequently make to a healthy economy.	Comments Noted. It is recognised that intrinsic character and beauty are important and this policy seeks to protect the natural environment which character and beauty form an important part of. Recommended Response: No Change
ANON- KSAR- NKEY-8	Under NE1(i) I think it needs to be clearer which financial contributions are being referred to. The current wording is too broad. Off site mitigation for nutrient neutrality is routine for example (as opposed to 'very exceptional') and will require a financial contribution. District licensing for great crested newts is not yet available in Winchester, but hopefully will be one day - this is precisely	Criterion v already acknowledges that 'special circumstances dictate that an offsite contribution is more appropriate'.

	<p>a means of delivering meaningful conservation measures through financial contributions, which is better for newts and developers.</p> <p>If what you're referring to is biodiversity net gain, omit here and consolidate under the later dedicated policy. Again though there are situations, which are far from 'very exceptional', where delivery of BNG on-site is incompatible with efficient use of land.</p>	<p>Recommended Response: No Change.</p>
ANON-KSAR-NK3D-1	<p>I very much welcome the Council's decision to protect the environment and where possible avoid building on Green Field sites. Any build on these sites would undoubtedly significantly degrade not only the diversity and natural habitat around us but in certain cases impact the unique waterways that are already under threat .</p> <p>Consequently, I urge you to maintain your position, despite the pressure from developers to build on Green Field sites. They have shown scant regard for the unique environment we live in and which cannot be replaced once lost</p>	<p>Support welcomed and comments noted.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-NKBD-G	<p>Please protect Bushfield camp and its surrounding environment and Texas Fields in Oliver's Battery from 'development'. They are vital, natural green spaces that are greatly valued by the local community. They are sites of high biodiversity with rare species such as glow worms living in them.</p>	<p>Comments Noted. Further details can be found under Policy W5 (Bushfield Camp). This is proposed to be developed for a mixed use business and employment space and innovation/ education hub. The site is limited to a maximum of 20Ha of build development and "should take into account the use of land previously occupied by the army base" (Point iii) i.e. development should be located, where possible, on previously developed land on site. Point xiii</p>

		<p>sets out that a Habitats Regulation Assessment is required and also Point xv requires a green/blue infrastructure strategy. It is important to read the Local Plan as a whole. Biodiversity is covered under Policy NE5.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-NKC8-5	<p>In principle it appears well drafted. My view is that all green filed areas have to be protected, that means preventing sites from being developed such as Texas Field, and the South Winchester Golf Course.</p> <p>In adopting a blanket NO to all new development you , at a stroke, protect that green environment, and mitigate the pressures on the city centre, eg traffic and transport, drainage, water, energy</p>	<p>Comments Noted and support welcomed.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-NKH2-4	<p>There is a plan to remove the trees behind the houses at Rareridge Lane, Bishops Waltham. These trees are relatively new as the owner has tried to remove these once before and was instructed to re-grow the trees. Why has this policy changed.</p> <p>We need as many trees as possible and to remove them or hedgerow is wrong. Grass is the equivalent of a desert and only supports a few species, trees and hedgerow support a wide variety or very important fauna.</p> <p>Trees have a higher value to the planet than buildings. Do not remove them.</p>	<p>Comments noted and relate specifically to Policy BW4 – Rareridge Lane.</p> <p>It is important to read the Local Plan as a whole. Biodiversity is covered under Policy NE5.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-NK47-N	<p>At a time of climate emergency we need to put biodiversity and sustainability as a primary priority.</p> <p>I support the sustainable approach to new development with priority for</p>	<p>General support welcomed.</p> <p>The NPPF does not require local authorities to designate ‘Valued</p>

	<p>brownfield sites. We need to protect our landscapes, biodiversity and promote wellbeing and quality of life.</p> <p>This plan does not however, allow for the identification and designation of Valued Landscapes.</p> <p>This is particularly relevant in areas such as Olivers Battery where it leaves us less protected against development that is not supported by the local community (95% voted against in the recent survey). This approach by WCC needs to be reviewed and amended in line with the guidance suggested by CPRE.</p>	<p>Landscapes'. The majority of the district is protected 'Countryside' under current Local Plan policies MTRA4 and CP20 of the current Local Plan Part 1, and Policies DM15 and DM23 of the Local Plan Part 2.</p> <p>As the NPPF does not define what a 'valued landscape' is and contradictions in case law as to what defines a 'valued landscape', the Local Plan will not be seeking to designate 'Valued Landscapes'.</p> <p>Recommended Response: No Change</p>
<p>ANON- KSAR- NKDW-5 Littleton and Harestock Parish Council</p>	<p>The Plan recognises the importance of the natural environment and this policy sets out the framework for managing the impact on it of development. Development will only be permitted where it demonstrates that it will protect and enhance the natural environment and biodiversity. Littleton and Harestock Parish Council considers that the natural environment of the district is one which must be protected and opportunities taken to enhance it. Littleton and Harestock Parish Council supports the policy.</p> <p>Support Policy NE1</p>	<p>Support welcomed and comments noted.</p> <p>Recommended Response: No Change</p>
<p>ANON- KSAR- NKDP-X</p>	<p>But I feel that you are valuing nature because of its impact on climate change mitigation and access/mental health. It is also important to recognise that we are one of the most nature-depleted countries in the world and that nature is valuable in itself. It also underpins our very existence.</p>	<p>Comments Noted.</p> <p>Recommended Response: No Change</p>

<p>ANON-KSAR-NKJY-D Hampshire County Council</p>	<p>As landowner, Hampshire County Council supports the inclusion in the Local Plan of the 10% biodiversity net gain requirement for new development which is in line with planned national policy (sound). In the event that on-site net gains of 10% cannot be achieved (for example on smaller sites), the County Council in its capacity as landowner supports the draft policy which allows for off-site biodiversity projects to be identified for developers to directly provide or contribute towards financially; in order to ensure the delivery of new development that is otherwise acceptable through the Plan period (be effective).</p> <p>The County Council would go further and suggest that developer contributions collected and assigned for biodiversity enhancements can be very effective to improve poor quality sites on a strategic scale within the District, and so a financial contribution is an appropriate option within the mitigation hierarchy and should not only be considered acceptable in very exceptional circumstances. This is supported by the intention of the Local Plan to support sustainable development as the 'Local Plan can allocate land for offsetting, mitigation' (para. 7.16) and so will be flexible and deliverable.</p>	<p>Support welcomed and noted.</p> <p>Recommended Response: No Change</p>
<p>ANON-KSAR-N8EY-N</p>	<p>I fully support cl 7.6 & 7.7. We must protect the countryside around the city and it's individual localities. There is such natural landscape that acts as a "lung" for the inhabitants and it must not be lost to development! No more development must be allowed within Oliver's Battery for these and transport and infrastructure reasons. More development in this location cannot be permitted or justified.</p>	<p>Comments noted and support welcomed.</p> <p>Recommended Response: No Change</p>
<p>ANON-KSAR-NKJ6-A</p>	<p>Policy, especially in Winchester town should also relate to existing street properties and the retention of front gardens - important for biodiversity.</p>	<p>Comments noted. It is important that the Plan is read as a whole.</p> <p>Recommended Response: No Change</p>
<p>ANON-KSAR-N8YF-P</p>	<p>There is great need to sustain, maintain and improve biodiversity, but back to the first statements in this section, there still needs to be public access to plenty of green space for walking/sitting/enjoying</p>	<p>Comments noted.</p>

		Recommended Response: No Change
ANON-KSAR-N85A-D	<p>[This response should be read in conjunction with the full copies of the 'Bishop's Waltham Representations to the Winchester Local Plan Regulation 18 representations OBO Crest Nicholson' representations submitted by email which includes the relevant figures, footnotes and appendices, with correct formatting]</p> <p>The natural environment plays a vital role in supporting physical and mental wellbeing and high-quality development is fundamental to achieving this. The Plan is supported by a Biodiversity Action Plan (2021) which sets out the challenges facing the district's natural environment and establishes a framework for how these challenges will be addressed. In line with the requirements of paragraphs 174 and 179 of the Framework, draft Policy NE1 seeks to protect and enhance the district's biodiversity and natural environment with draft Policy NE5 establishing the requirement for new development to provide a minimum of 10% biodiversity net gain which itself is in line with legislation in the forthcoming Environment Act.</p> <p>Crest Nicholson already seeks to achieve a minimum of 10% biodiversity net gain in its development proposals and will continue to do so should the Site be allocated by providing a development proposal with policy compliant biodiversity enhancements whilst protecting surrounding green infrastructure and contributing to meeting the goals of the Council's Biodiversity Action Plan.</p> <p>Indeed, as identified earlier in these representations, the Site is much better-placed to achieve the requirements of draft Policy NE1 than draft allocation BW4, which requires significant vegetation removal that will, inherently, limit the extent of biodiversity net gain that can be achieved on that site.</p>	<p>Comments noted and support welcomed.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-N8MP-M	[This response should be read in conjunction with the full copies of the 'North Whiteley Representations to the Winchester Local Plan Regulation 18 representations OBO Crest Nicholson' representations submitted by email	Comments Noted and support welcomed.

	<p>which includes the relevant figures and appendices, with tables correctly formatted]</p> <p>The natural environment plays a vital role in supporting physical and mental wellbeing and high-quality development is fundamental to achieving this. The Plan is supported by a Biodiversity Action Plan (2021) which sets out the challenges facing the district's natural environment and establishes a framework for how these challenges will be addressed. In line with the requirements of paragraphs 174 and 179 of the Framework, Strategic Policy NE1 seeks to protect and enhance the district's biodiversity and natural environment with Policy NE5 establishing the requirement for new development to provide a minimum of 10% biodiversity net gain which itself is in line with legislation in the forthcoming Environment Act.</p> <p>Crest Nicholson already seeks to achieve a minimum of 10% biodiversity net gain in its development proposals and will continue to do so by providing a development proposal with policy compliant biodiversity enhancements whilst protecting surrounding green infrastructure and providing green spaces to enhance the lifestyles of the Whiteley community and contribute to meeting the goals of the Council's Biodiversity Action Plan. The Vision Document (Appendix 1, submitted separately via email) demonstrates how the existing natural environment will be protected with biodiversity enhancements such as bee hotels and bat boxes provided where possible.</p>	<p>Recommended Response: No Change</p>
<p>ANON-KSAR-N8X5-4</p>	<p>The Dever Society made detailed points on biodiversity in our response to the SIP consultation, with specific reference to the mid-Hampshire Downs and the Dever Valley. These points are still relevant and we would like them to be taken into account.</p>	<p>Comments noted and comments on the SIP have been taken into account in forming the Reg 18 Local Plan.</p> <p>Recommended Response: No Change</p>

ANON-KSAR-N856-2	I am not confident that the relocation of the slow worms from the new Bewley homes Winchester Rd. development in Wickham to the proposed sport & recreation site at Mill Lane has been successfully achieved. If not, this policy has already been contravened.	It is not possible to comment on an individual planning application. Recommended Response: No Change
ANON-KSAR-N85J-P	Bloor support the prioritisation of protecting and enhancing biodiversity and the natural environment in the district, however note that it would be beneficial for threshold terms such as 'significant' to be defined within policies.	Support noted. Recommended Response: No Change
ANON-KSAR-N8Q5-W	<p>In supporting this policy, we particularly welcome the explicit mention of ancient woodland and ancient & veteran trees in para iv).</p> <p>We ask that this wording, either in the policy or in the accompanying explanatory text, be expanded to name the full range of ancient woodland habitats, including plantations on ancient woodland sites, ancient wood pasture, historic parkland and wet woodland. These should receive the same consideration as other forms of ancient woodland. Development on open space between trees in an area of ancient wood pasture or historic parkland should not be permitted.</p> <p>Further information is available in the Woodland Trust's "Planners' Manual for ancient woodland".</p>	Support and comments noted. Policy NE15 encompasses all ancient woodland and veteran trees and it would not be appropriate to specify types in the supporting text. Recommended Response: No Change
ANON-KSAR-N8GG-5	<p>To Protect and Enhance Biodiversity and the Natural Environment :</p> <p>DON'T build on "Greenfield sites". Including DON'T build on "West of Courtenay Road", which includes endangered species including bats, and "Greenfield" and "Green Space" improve Air Quality - plants Photosynthesis absorb Carbon-dioxide and breathe out Oxygen. Green Plants minimise Climate Change. Trees provide shelter and shade and fix and retain high-quality soil by preventing soil run-off, so Trees retain nutrient-rich soil to grow Food.</p>	Comments Noted. The policy seeks to protect and where possible enhance the natural environment and ecology. Recommended Response: No Change

We rely on Farmland and Nature to eat and to survive.

=> Countryside earns income - 78% of Cotswolds Tourism Day Visits are Countryside visits (4,113,000 Countryside Day Visits out of 5,240,000 Total Day Visits), => and about 2/3 (68%) of Cotswolds Tourism Day Visits income is from Countryside visits (£123,720,000 Countryside out of £180,764,000 Total Day Visits income)

WCC Biodiversity Action Plan is valuable :

v. Provide, protect and enhance blue/ green infrastructure to include open spaces, green links and wildlife corridors with support from the Biodiversity Action Plan.

vi. Mitigate and protect the area from the impacts of, and adapt to the effects of the climate emergency, by promoting design, lifestyle and business to reduce carbon emissions, promote recycling and minimise waste.

We rely on Farmland and Nature to eat and to survive. For example we rely on Bees etc to pollenate Food crops that we rely on to eat.

Environment Agency 07 November 2022:Flood Action Week: Households urged to prepare in 2022 year of extremes "Since 1998 we have seen six of the ten wettest years on record."

Year 2022 had both the Hottest and Driest summer since 1976, and 12 December 2022 was the Coldest day in 10 years. We MUST retain and Enhance Environment to minimise Climate Change loss of life and minimise Climate Change damage and Costs.

BBC 15 June 2022

Climate change: Rising sea levels threaten 200,000 England properties
'Nearly 200,000 properties in England may have to be abandoned due to rising

sea levels by 2050, a report says. About a third of England's coast will be put under pressure by sea level rise, the report says. The study is published in the journal Ocean and Coastal Management.'

(4) Landscape and Countryside and Heritage bring Tourism income.
"Winchester attracts an estimated 5.6 million visitors each year."

There is a financial value of Landscapes and Countryside
- South Downs National Park and Hampshire Countryside will bring Tourists back visit after visit.

<https://www.cotswolds.com/dbimgs/Cotswold%202021.pdf>

=> About 3/4 (78%) of Cotswolds Tourism Day Visits are Countryside visits (4,113,000 Countryside Day Visits out of 5,240,000 Total Day Visits),
=> and about 2/3 (68%) of Cotswolds Tourism Day Visits income is from Countryside visits (£123,720,000 Countryside out of £180,764,000 Total Day Visits income)

(5) Hampshire has invaluable and irreplaceable Countryside assets that attract Tourism Visitors every day, week, month, and year: South Downs National Park, New Forest National Park, Hampshire Historic Heritage sites ("Local Plan" The Historic Environment" section). Every area of Countryside and Green Space.

Don't lose Hampshire Countryside and Green Space - both bring Tourism and bring better Health and Wellbeing and more productive Hampshire Employees.

(6) Every area of Countryside and Green Space attracts Tourism Visitors and Residents, and bring healthy exercise and enjoyment that make every Resident and Employee more productive and more successful. NHS recommend 150 minutes exercise every week .

<https://www.nhs.uk/live-well/exercise/running-and-aerobic-exercises/walking-for-health/>

	<p>Brisk walking in Green Space every day could bring YOU up to 33% better Health and longer life.</p> <p>(7) There is a Climate Emergency - INSULATE to Cut Energy Costs. Every Green Space and every Countryside area and every Tree planted helps minimise Climate Change. Every Building better insulated helps Minimise Climate Change and helps Cut YOUR high Energy Costs. EVERY individual can help: Cycle or Walk where you can, brings better Health and reduces YOUR Fossil Fuel costs.</p> <p>For heavier loads, using Bus or Train might cut YOUR travel costs. Supermarket etc deliveries will still need HGVs, but can sometimes use Rail "Transport Hubs" to transport heavy deliveries and reduce Fossil Fuels use. Insulate YOUR home can reduce YOUR high energy Fuel Costs. Using less Electricity can cut EVERY home's Costs: "Energy Saving Trust" advice can help EVERY home Energy Saving Trust "Energy at Home" https://energysavingtrust.org.uk/energy-at-home/ https://energysavingtrust.org.uk/wp-content/uploads/2022/11/Energy-Saving-Trust-Warm-Home-Hacks-guide-final.pdf</p>	
<p>BHLF- KSAR- N8T8-3 Olivers Battery Parish Council</p>	<p>OBPC strongly supports a Local Plan that provides for a sustainable approach to the siting of development, giving priority to brownfield land, requires high quality design to maintain local distinctiveness and create high quality new landscapes and townscapes, and protects and enhances the landscape, scenic and amenity value of the district, including ensuring the preservation of tranquillity, and intrinsic dark skies.</p> <p>OBPC strongly support aspirations in the Vision that envisages that the natural beauty, biodiversity and cultural heritage will be enhanced and that new development will enhance the sustainability of communities and the natural environment.</p> <p>OBPC support clauses 7.6 and 7.7 stating the need to protect the countryside from unplanned and large scale development, recognising the intrinsic character and beauty of the countryside.</p>	<p>General support welcomed.</p> <p>The NPPF does not require local authorities to designate 'Valued Landscapes'. The majority of the district is protected 'Countryside' under current Local Plan policies MTRA4 and CP20 of the current Local Plan Part 1, and Policies DM15 and DM23 of the Local Plan Part 2.</p>

<p>However, the draft Local Plan is still omitting some fundamental requirements needed to render it a Sound Local Plan in compliance with NPPF. For example, Valued Landscapes. There is a need for identification and designation of Valued Landscapes and accompanying policies for their protection in accordance with NPPF paragraph 174.</p> <p>Policy CN5 expressly encompasses "the landscape and visual amenity of areas designated for their local, nationalimportance". The landscape outside the national park is not all of equal value. Land that meets the criteria for Valued Landscapes should be expressly designated as such and recognised as of local importance.</p> <p>Court cases have established that a 'valued landscape' is a landscape outside a "designated landscape" (ie national park or Area of Outstanding Natural Beauty) that is more than 'mere countryside' but is a landscape that has demonstrable attributes which take it 'out of the ordinary'.</p> <p>It has also established that development in a Valued Landscape should be restricted, on the basis that the social and economic benefit of development would be significantly outweighed by the environmental harm caused, and that this is a material consideration to be taken into account in the decision-making process. It follows that a Valued Landscape offers more protection in planning terms than "ordinary countryside" (but less than landscape in a national park or AONB).</p> <p>In Local Plans adopted after 2018 Valued Landscapes should be "identified" by way of a map, with an accompanying protective Policy in the text.</p> <p>OBPC supports Policy NE9 on Landscape Character, but Landscape Character Assessment makes no judgment on the value of the landscape and cannot be a substitute for identification and designation of Valued Landscapes.</p> <p>Winchester is at odds with other local planning authorities. East Hampshire has accepted the importance of designating Valued Landscapes in accordance with the NPPF.</p> <p>WCC's opposition to this strategy was outlined at WCC's Local Parish Meeting on Tuesday 15 November by the Strategic planning Manager by saying if some areas are designated as valued, then what about all the rest? This</p>	<p>As the NPPF does not define what a 'valued landscape' is and contradictions in case law as to what defines a 'valued landscape', the Local Plan will not be seeking to designate 'Valued Landscapes'.</p> <p>Recommended Response: No Change</p>
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	<p>'flatline' approach to landscape quality goes against designating some areas National Parks and AONB, as well as Valued Landscapes.</p> <p>It is an issue of some concern, given that Oliver's Battery is surrounded by Valued Landscapes, that WCC is taking this line, in not distinguishing the quality of landscapes, as proposed by NPPF and supported by the Courts. It leaves the areas around our Parish less strongly protected against inappropriate development as similar landscapes in East Hampshire.</p> <p>The Valued Landscapes in and around Oliver's Battery are identified in the CPRE report to WCC dated 9 March 2021 (https://www.cprehampshire.org.uk/wp-content/uploads/sites/3/2021/03/CPREH.-South-West-Winchester.-Valued-Landscape.pdf).</p>	
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<p>BHLF- KSAR- N8TG-J</p>	<p>CPRE Hampshire does not have expertise in matters of biodiversity and so our comments are confined to landscape and related aspects of the natural environment. As an overall statement, CPRE strongly supports a forward-looking strategic plan for Winchester District that provides for a sustainable approach to the siting of development, giving priority to brownfield land; requires high quality design to maintain local distinctiveness and create high quality new landscapes and townscapes; and protects and enhances the landscape, scenic and amenity value of Winchester District, including ensuring the preservation of tranquillity, and intrinsic dark skies. In the context of the natural environment, the Vision envisages that the natural beauty, biodiversity, and cultural heritage will be enhanced. Key assets such as chalk streams and the setting of the national park will be protected. New development will enhance the sustainability of communities and the natural environment. These are aspirations which we strongly support. Accordingly, our strong support is given also to the Objectives designed to achieve those aspirations, notably (in summary); the promotion and prioritisation of brownfield land (Objective b); maintenance and enhancement of Winchester Districts valuable environments, urban and rural (Objective c); and ensuring that development does not have an adverse impact on landscape character or the unique and special characteristics of the national park (Objective d).</p> <p>We note also Paragraphs 7.6 and 7.7 stating the need to protect the countryside from unplanned and large-scale development, recognising the intrinsic character and beauty of the countryside (as per NPPF), and noting that one of the key aims of the Local Plan is to concentrate development within the most sustainable locations and to protect the countryside from unnecessary development. These Objectives have our full support.</p> <p>In terms of delivery of such aspirations and objectives, we have always considered the current strategic policy CP20 of the Joint Core Strategy (JCS) to be rather weak as regards protection of the landscape and the natural environment. For the reasons set out below, we see this new Plan as an improvement on the JCS, but still omitting some fundamental requirements needed to render it a Sound plan in compliance with NPPF.</p>	<p>Comments Noted and general support welcomed.</p> <p>Recommended Response: No Change</p>
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	<p>Consistency of wording</p> <p>Throughout the new Plan there are references to harm to the landscape and natural environment. This is expressed as "adverse impact" (Objective d), "not cause harm" (e.g. Policy SP3), "an unacceptable impact" (e.g. Policy CN5), "no unacceptable impact" (e.g. Policy CN6), "significant harm" (e.g. Policy NE1), "an unacceptable effect" (e.g. Policy NE14).</p> <p>This is inconsistent and likely to be confusing to Case Officers dealing with planning applications, and those responding to them. In particular, the word "unacceptable" carries with it the need for a significant degree of subjective judgment as to acceptability. What is acceptable to one is not acceptable to another.</p> <p>We suggest that throughout the new Plan the words "no significant harm" or "no significant adverse impact" are used. These require an element of subjective judgment as to whether the harm is significant but carry a higher degree of objectivity.</p> <p>We support this policy but it is largely confined to biodiversity protection. We suggest that Policy NE9 on Landscape Character is also made a Strategic Policy (perhaps NE2), covering also the requirements of Policy NE14 on Rural Character so to provide a comprehensive strategic policy for the protection of landscape, visual amenity, tranquillity and dark skies.</p>	<p>Comments Noted. The references to harm are appropriate in the Policy context and therefore it is not appropriate to use the same harm reference across the Plan.</p> <p>The Plan should be read as a whole.</p> <p>Recommended Response: No Change</p>
<p>BHLF-KSAR-N8RZ-3</p>	<p>I support clauses 7.6 and 7.7 stating the need to protect the countryside from unplanned and large scale development, recognising the intrinsic character and beauty of the countryside. But this and any draft Local Plan needs to be sound and include some fundamental requirements to ensure compliance with NPPF. For example identification and designation of Valued Landscapes is necessary together with policies for their protection.</p> <p>Land that meets the criteria for Valued Landscapes should be expressly designated as such and recognised as of local importance.</p> <p>It has been established previously that development in a Valued Landscape</p>	<p>General support welcomed.</p> <p>The NPPF does not require local authorities to designate 'Valued Landscapes'. The majority of the district is protected 'Countryside' under current Local Plan policies MTRA4 and CP20 of the current Local Plan Part 1, and Policies DM15 and DM23 of the Local Plan Part 2.</p>

	<p>should be restricted on the basis that the social and economic benefit of development would be significantly outweighed by the environmental harm caused, and that this is a material consideration to be taken into account in the decision-making process.</p>	<p>As the NPPF does not define what a 'valued landscape' is and contradictions in case law as to what defines a 'valued landscape', the Local Plan will not be seeking to designate 'Valued Landscapes'.</p> <p>Recommended Response: No Change</p>
<p>BHLF-KSAR-N8ZF-Q</p>	<p>Dudsbury Homes fully support the protection and enhancement of biodiversity, and expects to deliver more than the minimum standards being introduced by the Government. An ecology survey has been undertaken on the land it controls in Denmead, and this will be regularly updated to ensure a biodiversity record is kept and can be used to help design a successful housing scheme, if the site is allocated.</p>	<p>Comments Noted and support welcomed.</p> <p>Recommended Response: No Change</p>
<p>BHLF-KSAR-N8BS-C</p>	<p>BSP recognise the importance of protecting and enhancing the natural environment and biodiversity. In recognising this it is also important that any development proposals / proposed allocations promote natural enhancements and not diminish them. Careful consideration must be given to sites that were once PDL whereby nature has re-established itself, these are often far more biodiverse in fauna / flora than greenfield sites on the edge of settlements. The opportunity on land east of Lovedon Lane is unique. This can provide extensive new habitats and create ecological corridors that link up with the open space to the south and wider habitat network on the perimeter of the site. The site can achieve well in excess of 10% biodiversity net gain through the integration of blue and green infrastructure. The site is also located within the Natural England Network Expansion Zone which should inform habitat creation and restoration. The development concept reflect the sites location within this zone and presents very real opportunities for fauna that are likely to already</p>	<p>Comments Noted in relation to the site.</p> <p>Recommended Response: No Change</p>

	use the site, together with species that do not, notably bats, dormouse, birds and invertebrates.	
BHLF-KSAR-N8BX-H	<p>Biodiversity and the natural Environment. Strategic Policy NE1 NE3 NE5. The Trust supports the concept of biodiversity net gain being considered off site. Protecting and enhancing biodiversity across the district is important and the Trust supports the Biodiversity and the Natural Environment policies.</p> <p>The trust agrees that access to green space for recreation is a key community component, encouraging activity which can increase individual's health and wellbeing. The Trust therefore strongly supports the protection afforded to public open areas that this policy brings.</p>	<p>Comments Noted and support welcomed.</p> <p>Recommended Response: No Change</p>

Comments which neither support or object to NE1- protecting and enhancing biodiversity and the natural environment in the district		
Respondent number	Comment	Officer comment
ANON-KSAR-NK3F-3	Policy and your proposed housing developments are two different things, the one negating the other. SW07 is an open, green field site, flanked by a bridle way, the continuation of Alresford Drove, which is a popular walk for the locals and for horse riders. The natural environment and biodiversity would therefore be endangered,	<p>Comments Noted. The Plan should be read as a whole. The development proposal will need to demonstrate that there is no net loss of biodiversity in accordance with Policy NE5 (Biodiversity Net Gain).</p> <p>.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-NKS3-G Bishops	NE1 - Question: Could this lead to 'distant' offsetting? For example a developer provides the mitigation on another site many miles away from the offset/proposed development site? Could a developer building houses in the South of the District, use a site for offsetting in the North of the District, or even	<p>Comments Noted.</p> <p>Developments need to follow the Biodiversity Gain hierarchy as</p>

Waltham Parish Council	elsewhere such as East Hampshire District Council area, or even further afield such as a different County?	set out in the PPG (Para 008 Ref ID: 74-008-20240214). Recommended Response: No Change
ANON-KSAR-NKG5-6 Crawley Parish Council	(7.18) Where is the ambition to offer new Open space to an expanding population in countryside around Winchester? Are there any new footpaths/safe cycleways planned between the villages and routes into Winchester.	Additional infrastructure requirements will be dealt with as part of the Infrastructure Delivery Plan (IDP). Recommended Response: No Change
	(7.16) Allocations for offsetting or mitigation biodiversity/green space loss in a development area sounds good in principle, BUT the plan needs to make sure that those areas that suffer a loss benefit from any new allocation. Safety checks should be put in place, so the system cannot be gamed. Full consulting with local community needs to take place. e.g. if there is an open space loss, any offsetting needs to offer local community new open space within a certain distance.	This is covered by Mandatory Biodiversity Net Gain. Any development proposal will need to apply for planning permission which will include a minimum statutory four week consultation period. Recommended Response: No Change
	There are instances where there has been a loss of biodiversity on a development and the council then 'designates' a new nature area to make up for this loss. However, it turns out that the new 'designated' area is not really new, but already an existing biodiverse area – like South Downs National Park or by simply renaming an area of a recreational park as a nature area/reserve. This would not be genuine offsetting and deliver no local benefit regarding promoting biodiversity.	Each case will be judged on a site by site basis to ensure such provision of replacement biodiversity is genuine. Recommended Response: No Change

ANON-KSAR-NKHA-K	<p>1. Laudably the plan states "...or can adequately mitigate any harm arising and can clearly demonstrate that there will be no adverse impact on the conservation status of key species,...". A case in Wickham where a developer was required to transfer slow worms to another site has been the subject of Fol requests. To date no answer has been delivered. The suspicion arises, therefore, that the creatures were not safely gathered and removed. It is imperative for local confidence that the policy included in the Plan is rigorously pursued by officials and information provided to the public.</p>	<p>Comments Noted. This is a site specific issue that has been raised and is not yet subject to the emerging Local Plan.</p> <p>Upon adoption of this version of the Local Plan and Policy NE1, any development proposal would need to adhere to this policy.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-NK29-N	<p>Para 7.5 – Add at end of first sentence ‘and Nature-based Solutions.’</p> <p>Para 7.9 – Add sentence to end of para ‘Especially where Nature-based solutions are obvious to progress delivery of carbon net zero and biodiversity protection.’</p> <p>Para 7.16 – Land for offsetting requires careful consideration as a last option to achieve carbon net zero. A supporting SPD is needed with detail on the offsetting standards to ensure good regulation and sustainable management with clear benefits for the most appropriate period.</p> <p>Para 7.21 – Add new para: ‘The Plan requires a local state of nature report to enable nature recovery. This is underpinned by the Environment Act to develop Local Nature Recovery Strategies and will take a period of time to establish. This requirement can be assisted with optimal offsetting from developers with ‘biodiversity credits’ for 30 years as long as they meet the standards in the offsetting and Nature-based solutions SPDs plus the Environment Act. This should always be the last option in achieving carbon net zero and only for the most significant nature recovery sites.’</p>	<p>In regards to ‘Nature Based Solutions’ under Para’s 7.5 and 7.9 would be too vague and non-descript.</p> <p>In relation to Paragraph 7.21, the plan would not refer to a requirement for itself, however, this paragraph will be considered as an addition.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-NKJH-V	<p>This is all too complicated and imagine many people give up when they get to this stage. I think many would like to see an end to large scale development on Green Field sites such as Barton Farm and Winchester Village. Winchester has become too urbanised rather than an historic city set in the rolling hills of</p>	<p>Comments Noted.</p> <p>Recommended Response: No Change</p>

	<p>the Hampshire countryside. Today it is little more than a commuters dormitory town.</p> <p>Constantly new green areas are under threat and there seems no end to the developers appetite to build over and expand the City. Heaven knows how much Bio-diversity and animal life was lost with the concreting over of Barton Farm ?</p> <p>The only sensible way forward has got to be more respect and protection for all the remaining green spaces that surround the City without exception.</p>	
<p>ANON-KSAR-NKAP-U</p>	<p>Please take this as an overall comment to this section.</p> <p>I support the overall move to a Local Plan which provides a sustainable approach to areas of development. In the past Winchester managed this well providing excellent Council developments such as Stanmore. The houses and overall provision for everything except road width was visionary. This clear historic strength should inform the future with similar careful priorities.</p> <p>The Landscape around the town remains a great asset and should be protected. Some areas have already been identified as 'Valued Landscapes' and these should be given special status by the Local Plan.</p> <p>As I have previously stated the land around Oliver's Battery should be considered as valuable as it is the same rich chalk downland as that in the SDNP. This should be identified clearly in the Local plan.</p>	<p>General support welcomed.</p> <p>The NPPF does not require local authorities to designate 'Valued Landscapes'. The majority of the district is protected 'Countryside' under current Local Plan policies MTRA4 and CP20 of the current Local Plan Part 1, and Policies DM15 and DM23 of the Local Plan Part 2.</p> <p>As the NPPF does not define what a 'valued landscape' is and contradictions in case law as to what defines a 'valued landscape', the Local Plan will not be seeking to designate 'Valued Landscapes'.</p> <p>Recommended Response: No Change</p>

ANON-KSAR-N8YM-W	<p>BSP support the key principle of Policy NE1 of ensuring that development proposals protect and enhance the natural environment and biodiversity of the district. Furthermore, it is considered that proposals that promote natural enhancements should be prioritised.</p> <p>It is noted that this represents a key tenet of the design approach for the proposals at Fairthorne Grange. Within the Shawfords Lake corridor and green edges there is an opportunity to provide extensive new habitats as part of an exemplar landscape-led design helping to increase biodiversity on the site over and above 10% net gain. These environmental enhancements are considered to be in accordance with the aspiration of policy NE1.</p>	<p>Comments Noted and support welcomed.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-NKAB-D	<p>BSP support the key principle of Policy NE1 of ensuring that development proposals protect and enhance the natural environment and biodiversity of the district. This is reflected in the vision for the opportunity at Land North of Rareridge Lane, and in particular its emphasis on a landscape-led scheme, responding to the site's setting.</p>	<p>Comments Noted and Support welcomed.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-N81F-E	<p>Bargate Homes welcome the recognition that the Local Plan has an important role in providing strategic solutions to nutrient neutrality to ensure that the local housing need can be delivered over the plan period to help ensure that matters like affordability are managed effectively. Developments should take advantage of opportunities on site for mitigation, but the reality is that strategic solutions are needed as well. This key issue justifies a specific policy in the Local Plan to support strategic solutions. It would also be helpful to cross reference to the relevant detailed policies in this overarching strategic policy.</p>	<p>Comments Noted and Support Welcomed.</p> <p>Recommended Response: No Change</p>
BHLF-KSAR-N8TQ-V	<p>I agree with OBPC who support clauses 7.6 and 7.7 stating the need to protect the countryside from unplanned and large-scale development, recognising the intrinsic character and beauty of the countryside. Valued Landscape should be avoided such as the fields adjacent to Texas Drive and the Yew Hill Butterfly Reserve which are of great community value and are well used by walkers, families dog walking, cyclists and horse riders.</p>	<p>Comments noted. Please see response to Oliver's Battery Parish Council.</p> <p>Recommended Response: No Change</p>

<p>BHLF- KSAR- N8T2-W</p>	<p>I am very much in agreement with the response of Olivers Battery Parish Council. I especially agree with their comments regarding Protecting Biodiversity (policy NE1)</p>	<p>General support welcomed.</p> <p>The NPPF does not require local authorities to designate 'Valued Landscapes'. The majority of the district is protected 'Countryside' under current Local Plan policies MTRA4 and CP20 of the current Local Plan Part 1, and Policies DM15 and DM23 of the Local Plan Part 2.</p> <p>As the NPPF does not define what a 'valued landscape' is and contradictions in case law as to what defines a 'valued landscape', the Local Plan will not be seeking to designate 'Valued Landscapes'.</p> <p>Recommended Response: No Change</p>
<p>BHLF- KSAR- N8T5-Z</p>	<p>Having read the response of Oliver's Battery Parish Council I agree with their views. Particularly their comments regarding :- Protecting Biodiversity (policy NE1)</p>	<p>General support welcomed.</p> <p>The NPPF does not require local authorities to designate 'Valued Landscapes'. The majority of the district is protected 'Countryside' under current Local Plan policies MTRA4 and CP20 of the current Local Plan Part 1, and Policies</p>

		<p>DM15 and DM23 of the Local Plan Part 2.</p> <p>As the NPPF does not define what a 'valued landscape' is and contradictions in case law as to what defines a 'valued landscape', the Local Plan will not be seeking to designate 'Valued Landscapes'.</p> <p>Recommended Response: No Change</p>
	<p>We welcome the inclusion of 'Tackling the climate emergency and creating a greener district' as the first key objective of the Local Plan through enhancing biodiversity and green infrastructure.</p> <p>We believe this theme needs to be further developed by committing to create and protect a Nature Recovery Network as part of the Local Plan, in line with national commitments in the Environment Act 2021. While the objective does reference enhancing wildlife corridors, we must see a full Nature Recovery Network completed and protected for nature by 2030 if we are to halt the decline of nature and meet the national targets set out in the Environment Act. Winchester City Council plays a crucial role as the gateway to the South Downs National Park, a landscape that will play an increasing role in nature's recovery as National Parks and AONBs are prioritised for nature protection. The Council should further consider its role in reconnecting the fragmented habitats with the South Downs by supporting the creation of a contiguous Nature Recovery Network that stretches across the district and through the National Park.</p> <p>Furthermore, The Wildlife Trusts are calling for at least 30% of land and sea to be restored for nature and climate by 2030, in line with national and international commitments – planned and delivered as a Nature Recovery</p>	<p>Comments Noted. The Council will welcome working with the Wildlife Trust in regards to a Nature Recovery Network.</p> <p>Recommended Response: No Change</p>

	<p>Network and providing nature-based solutions such as pollution reduction, carbon removal and flood management.</p> <p>We would welcome Winchester City Council in joining this ambition by putting in place a clear target to halt the decline of nature by protecting at least 30% of land for nature by 2030 backed by mapping and appropriate policy mechanisms to ensure that the state of nature is turned around and wildlife starts to recover during this decade.</p>	
	<p>Comments on Strategic Policy NE1 - Protecting and enhancing Biodiversity and the Natural Environment in the district</p> <p>We are pleased to see a strategic policy focused on protecting and enhancing the natural environment in the district. In particular, we are pleased to see that there is a focus on protecting the Ecological Network and maintaining connectivity between designated sites and key habitats.</p>	<p>Comments Noted and General Support Welcomed.</p>
	<p>However, we would like to see “iii. Does not harm/degrade the Ecological Network or result in its fragmentation” amended so that development goes beyond ‘not harming’ but should actively enhance and contribute to the Ecological Network/Nature Recovery Network.</p>	<p>Comments Noted. Criterion iii of Policy NE5 makes reference to enhancing the Ecological Network.</p> <p>Recommended Response: No Change</p>
	<p>We also consider that internationally designated sites should be included in i. “...no adverse impact on the conservation status of key species, internationally designated sites, nationally protected designated sites, or locally designated sites...” and ii. “... conserve and enhance habitats, including, internationally, nationally and locally designated sites, priority habitats, networks of ecological interest, ancient woodland, water features, hedgerows and wetland pastures as corridors and stepping- stones for wildlife”.</p>	<p>Comments Noted. The Council has added ‘Internationally’ to Points i and ii</p> <p>Recommended Response: Have added “Internationally” to Points i and ii</p>
<p>BHLF- KSAR- N8ZG-R</p>	<p>We are pleased to see natural capital referenced within the background information of this policy. However, we encourage Winchester City Council to include an ecosystem services policy within NE1, or as a standalone policy, which would aim to protect and improve natural capital and harness the role of nature-based solutions to tackle some of the societal and environmental</p>	<p>Comments Noted. This is to be dealt with by Hampshire County’s Nature Recovery Strategy.</p>

	<p>challenges facing the Borough. This would align with the revised NPPF (National Planning Policy Framework) paragraph 170 (b) which requires planning policies and decisions to recognise the benefits from natural capital and ecosystem services.</p> <p>A good example of an effective Ecosystem Services policy is in the South Downs Local Plan (Core Policy SD2) which requires developers to demonstrate how a development proposal impacts, both positively and negatively, on ecosystem services. They provide an ecosystem services map along with an Ecosystem Services Technical Advice Note which provides advice on how to take ecosystem services into account and what 'actions' are the most appropriate for the application.</p> <p>We recently published the Hampshire and Isle of Wight Local Nature Partnership's 'Natural Wealth' report which aims to provide evidence for the state and extent of our county's natural capital and provides recommendations for local planning authorities to embed the approach across their activities, including through planning. Please let us know if you would like to discuss the report further.</p>	<p>Recommended Response: No Change</p>
<p>BHLF- KSAR- N86N-U</p>	<p>Key issue vii is welcomed, as it recognises that the Local Plan has an important role in providing strategic solutions to nutrient neutrality to ensure that the local housing need can be delivered over the plan period to help ensure that matters like affordability are managed effectively. Developments should take advantage of opportunities on site for mitigation, but the reality is that strategic solutions are needed as well. This key issue justifies a specific policy in the Local Plan to support strategic solutions. It would also be helpful to cross reference to the relevant detailed policies in this overarching strategic policy.</p>	<p>General Comments and support welcomed.</p> <p>It is important to read the Local Plan as a whole.</p> <p>Recommended Response: No change.</p>

Comments which object to NE1- protecting and enhancing biodiversity and the natural environment in the district

Respondent number	Comment	Officer comment
ANON-KSAR-NK54-K	<p>This policy should be amended to specify that new developments will be required to include swift bricks (and bat bricks and other ecological enhancements). Currently there is no mention of these ecological enhancements in the policy despite the fact that in paragraph 7.23 it states that the council aspires to protect and enhance biodiversity and all aspects of the natural world, and that 'measures could include swift bricks, bat bricks etc'. Swifts are a priority species under the council's Biodiversity Action Plan. They are now Red-Listed, indicating they are at risk of extinction in this country. British Trust for Ornithology data show they have declined by 70% in the South East of the UK since 1995. They rely on buildings for nest sites but modern buildings are built in a way that excludes birds from nesting as there are no gaps or cavities for them to use. The provision of integral swift nest bricks in all suitable new buildings is essential if Swifts are to survive as a species in the UK. Swift nest bricks are 'universal' nest bricks as they are also readily used by House Sparrows - another of the priority species under the council's Biodiversity Action Plan - Starling, Great Tits, Blue Tits and other cavity nesting bird species. All new build developments of 5 metres or greater in height should incorporate swift bricks in the quantities and manner recommended by the British Standard BS 42021:2022 Integral nest boxes.</p> <p>Here's an example of appropriate wording taken from Wandsworth Council's Local Plan: "All development, particularly for new and replacement buildings and extensions to buildings, should utilise opportunities to attract new species to a site. This can include the incorporation of artificial nest boxes and bricks in buildings to provide</p>	<p>Comments Noted. As mentioned the reference to swift boxes is highlighted in Paragraph 7.23. It is considered that listing this in the policy would be too specific for this policy, as it would set a precedent for including other wildlife protections for other species that are equally as important.</p> <p>Recommended Response: No Change.</p>

	<p>nesting and roosting opportunities for birds, including species under threat such as swifts, house martins, swallows and house sparrows, and where appropriate, bats. Swift bricks integrated into new buildings are preferred, as these are suitable for multiple bird species. As outlined in the National Planning Practice Guidance, these relatively small features can achieve important benefits for wildlife. Applicants will be expected to provide details of such features as part of planning applications. All these features must also be protected during construction works, and this may be secured by a planning condition, as will subsequent maintenance and monitoring."</p>	
ANON-KSAR-NKWK-C	<p>The zone outside the MOD electric fence has been left to grow wild. It should be kept as a habitat and corridor for wildlife.</p>	<p>Comments Noted.</p> <p>It is important that the Local Plan is read as a whole.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-NK6J-A	<p>I feel there will be a negative effect on the Biodiversity of the area with the loss of varying habitats specific to this particular area of Woodland. The policy is not sympathetic to the current animal and plant species that reside in this space and development will result in the loss of these species for now and for future generations.</p>	<p>Comments Noted. Any development will need to meet the requirements of Policy NE5.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-NK79-T	<p>Policy NE1 should allocated a new Green Belt to protect the remaining open spaces in the southern parishes, in this highly pressured environment.</p>	<p>Comments Noted. A Green Belt review has been undertaken. Based on the conclusions of the Part 1 report, a new green belt designation is considered to be very unlikely in the current policy context. It is not currently considered that the five tests in the NPPF for new Green Belts could be met, in particular</p>

		<p>the requirement to demonstrate why normal planning and development management policies would not be adequate, and set out any major changes in circumstances which have made the adoption of this exceptional measure necessary. Therefore, the identification of a proposed new Green Belt is not being progressed.</p> <p>Recommended Response: No Change</p>
<p>ANON-KSAR-NKHU-7 Oliver's Battery Parish Council</p>	<p>Protecting and enhancing Biodiversity and the Natural Environment in the district (Policy NE1) OBPC strongly supports a Local Plan that provides for a sustainable approach to the siting of development, giving priority to brownfield land, requires high quality design to maintain local distinctiveness and create high quality new landscapes and townscapes, and protects and enhances the landscape, scenic and amenity value of the district, including ensuring the preservation of tranquillity, and intrinsic dark skies. OBPC strongly support aspirations in the Vision that envisages that the natural beauty, biodiversity and cultural heritage will be enhanced and that new development will enhance the sustainability of communities and the natural environment. OBPC support clauses 7.6 and 7.7 stating the need to protect the countryside from unplanned and large scale development, recognising the intrinsic character and beauty of the countryside. However, the draft Local Plan is still omitting some fundamental requirements needed to render it a Sound Local Plan in compliance with NPPF. For example, Valued Landscapes. There is a need for identification and designation of Valued Landscapes and accompanying</p>	<p>General support welcomed.</p> <p>The NPPF does not require local authorities to designate 'Valued Landscapes'. The majority of the district is protected 'Countryside' under current Local Plan policies MTRA4 and CP20 of the current Local Plan Part 1, and Policies DM15 and DM23 of the Local Plan Part 2.</p> <p>As the NPPF does not define what a 'valued landscape' is and contradictions in case law as to what defines a 'valued landscape', the Local Plan will not be seeking to designate 'Valued Landscapes'.</p> <p>Recommended Response: No Change</p>

	<p>policies for their protection in accordance with NPPF paragraph 174. Policy CN5 expressly encompasses "the landscape and visual amenity of areas designated for their local, nationalimportance". The landscape outside the national park is not all of equal value. Land that meets the criteria for Valued Landscapes should be expressly designated as such and recognised as of local importance. Court cases have established that a 'valued landscape' is a landscape outside a "designated landscape" (ie national park or Area of Outstanding Natural Beauty) that is more than 'mere countryside' but is a landscape that has demonstrable attributes which take it 'out of the ordinary'.</p> <p>It has also established that development in a Valued Landscape should be restricted, on the basis that the social and economic benefit of development would be significantly outweighed by the environmental harm caused, and that this is a material consideration to be taken into account in the decision-making process. It follows that a Valued Landscape offers more protection in planning terms than "ordinary countryside" (but less than landscape in a national park or AONB). In Local Plans adopted after 2018 Valued Landscapes should be "identified" by way of a map, with an accompanying protective Policy in the text.</p> <p>OBPC supports Policy NE9 on Landscape Character, but Landscape Character Assessment makes no judgment on the value of the landscape and cannot be a substitute for identification and designation of Valued Landscapes.</p> <p>Winchester is at odds with other local planning authorities. East Hampshire has accepted the importance of designating Valued Landscapes in accordance with the NPPF.</p> <p>WCC's opposition to this strategy was outlined at WCC's Local Parish Meeting on Tuesday 15 November by the Strategic planning Manager by saying if some areas are designated as valued, then what about all the rest? This 'flatline' approach to landscape quality goes against</p>	
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	<p>designating some areas National Parks and AONB, as well as Valued Landscapes.</p> <p>It is an issue of some concern, given that Oliver’s Battery is surrounded by Valued Landscapes, that WCC is taking this line, in not distinguishing the quality of landscapes, as proposed by NPPF and supported by the Courts. It leaves the areas around our Parish less strongly protected against inappropriate development as similar landscapes in East Hampshire.</p> <p>The Valued Landscapes in and around Oliver’s Battery are identified in the CPRE report to WCC dated 9 March 2021 (https://www.cprehampshire.org.uk/wp-content/uploads/sites/3/2021/03/CPREH.-South-West-Winchester.-Valued-Landscape.pdf).</p>	
ANON-KSAR-NKZ5-S	<p>I support this policy with the following proposed amends and comments for improvement.</p> <p>The following needs to be said in Foreword/Vision and Background 7.1 to 7.23</p> <p>Planning and designing for carbon neutrality and adapting to Climate Change needs to include considerations of Nature-based solutions (NbS) and explicitly whole life carbon.</p>	<p>Comments Noted and general support welcomed.</p> <p><u>Amendments to policy and supporting text</u> Paragraph 7.1:</p> <p>The council has declared a Climate Emergency and has set an ambition for the wider district to become carbon neutral by 2030. The Council has also agreed a motion on the nature emergency. The Local Plan has an important role in ensuring that nature based solutions are a key part of the plans to tackle the climate emergency. Allied to this, a A high quality natural environment is a key contributor to sustainable development</p>

	<p>Council activities have an impact on the natural environment just as they do on carbon emissions. Councils are required by the Environment Act to develop Local Nature Recovery Strategies. To do this requires a report on the State of Nature in the district.</p> <p>Without the Local Nature Recovery Strategies and a State of Nature in the district monitoring this Policy or any other cannot be determined.</p> <p>7.1 Amend last sentence</p> <p>.... is a key contributor to sustainable development, climate mitigation and adaptation and ...contributes to human and nature health and wellbeing.</p> <p>7.5 Add at end of first sentence</p> <p>... and Nature-based Solutions.</p> <p>7.9 Add new sentence at end of para</p> <p>Especially where a Nature-based solutions are obvious to progress delivery of carbon net zero and biodiversity protection. (This complementary to 7.14)</p> <p>7.16. Amend</p> <p>...land for offsetting requires careful consideration as a last option to</p>	<p>and can support a wide range of biodiversity and contributes to human health and wellbeing.</p> <p>In regards to an SPD, this is a matter that will be considered as the Local Plan is progressed.</p> <p>In relation to Paragraph 7.21, the plan would not refer to a requirement for itself, however, this paragraph will be considered as an addition.</p> <p>Recommended Response: No Change</p>
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	<p>achieve carbon net zero. A supporting SPD is needed with detail on the offsetting standards to ensure good regulation and sustainable management with clear benefits for the most appropriate period.</p> <p>Add new point to 7.22</p> <p>The Plan requires a local state of nature report to enable nature recovery. This is underpinned by the Environment Act to develop Local Nature Recovery Strategies and will take a period to establish. This requirement can be assisted with optimal offsetting from developers with 'biodiversity credits' for 30 years if they meet the standards in the offsetting and Nature-based solutions SPDs plus the Environment Act. This will always be the last option in achieving carbon net zero and only for the most significant nature recovery sites.</p> <p>7.23 End of para - ADD</p> <p>Application of best practise Nature-based solutions.</p> <p>NE1.</p> <p>Fully support iii and v.</p> <p>vi. End of para - ADD</p> <p>Plus assists the mitigation of carbon emissions and adaptation to climate change.</p>	
ANON-KSAR-NK2H-4	I strongly support the overall intent of the policy but believe that the identification and protection of Valued Landscapes should form part of it.	<p>General support welcomed.</p> <p>The NPPF does not require local authorities to designate 'Valued</p>

		<p>Landscapes'. The majority of the district is protected 'Countryside' under current Local Plan policies MTRA4 and CP20 of the current Local Plan Part 1, and Policies DM15 and DM23 of the Local Plan Part 2.</p> <p>As the NPPF does not define what a 'valued landscape' is and contradictions in case law as to what defines a 'valued landscape', the Local Plan will not be seeking to designate 'Valued Landscapes'.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-NKAK-P	<p>Cala Homes supports the general principles underpinning Policy NE1 with the exception of criteria (v). Rather than using terminology such as 'special circumstances' and 'very exceptional circumstances' when considering off-site enhancements, which become confused with national Green Belt terminology, it would be much clearer if the policy simply stated that applicants will be required to demonstrate that opportunities for ecological / biodiversity enhancements have been optimised on-site prior to off-site options being considered. If an applicant has shown that everything has been done on-site to optimise ecological / biodiversity improvements but to achieve a certain metric, some form of off-site mitigation is required, this should be supported by the Council as, assuming suitably robust legal controls can be introduced through the S106 regime, there are exciting opportunities to enhance biodiversity across Winchester including, for example, existing public open spaces, playing fields, school grounds etc. The approach in Policy NE1 is currently too inflexible when considering opportunities for</p>	<p>Comments Noted and support for General Principles welcomed.</p> <p>Recommended Response: No Change</p>

	<p>off-site enhancements as part of an evidenced, balanced approach.</p> <p>As the Council is aware, Cala has pioneered its 'urban wildlife strategy' on its site at King's Barton. We would like to see a commitment in Policy NE1 to require every new home delivered in Winchester to incorporate a bird and bat nesting feature within the built fabric as well as other features around invertebrate bricks, hedgehog holes and native tree planting.</p>	
ANON-KSAR-NKJV-A	<p>Whilst Bloor Homes supports the key principles of Policy NE1 of ensuring that development proposals protect and enhance the natural environment and biodiversity of the district, further consideration is required in respect of the precise wording of some of the criteria to ensure that the plan is effective and consistent with national policy.</p> <p>Criteria i of Strategic Policy NE1 fails to acknowledge the provision within paragraph 180 of the NPPF to, as a last resort, compensate for significant harm to biodiversity arising from development. This should be incorporated into criteria i of the draft policy.</p> <p>Clarity is also required in relation criteria iii as to what is meant by 'Ecological Network' as this is not defined in supporting text or the glossary. Policy requirements related to non-designated ecological assets should be proportionate to the value of that asset. Furthermore, where harm, degradation or fragmentation does occur, appropriate mitigation or compensation may be identified (as set out at paragraph 180 of the NPPF) such that there is no unacceptable impact. This should be recognised in Policy NE1.</p>	<p>Comments Noted and General support for key principles is welcomed.</p> <p>In regards to Criterion i, Paragraph 180 discusses determining planning applications rather than determining planning policy.</p> <p>In regards to Criterion iii, it is recognised that there needs to be reference to 'Ecological Network'.</p> <p>Recommended Response: Add 'Ecological Network' in the Glossary.</p>
ANON-KSAR-N8Y8-8	<p>I strongly support a Local Plan that provides for a sustainable approach to the siting of development, giving priority to brownfield land, requires high quality design to maintain local distinctiveness and create high quality new landscapes and townscapes, and protects and enhances the landscape, scenic and amenity value of the district</p>	<p>General support welcomed.</p> <p>General support welcomed.</p>

	<p>I support clauses 7.6 and 7.7 stating the need to protect the countryside from unplanned and large scale development, recognising the intrinsic character and beauty of the countryside.</p> <p>However, the draft Local Plan is still omitting some fundamental requirements needed to render it a Sound Local Plan in compliance with NPPF. For example, Valued Landscapes.</p> <p>It leaves the areas around our Parish less strongly protected against inappropriate development as similar landscapes in East Hampshire.</p>	<p>The NPPF does not require local authorities to designate 'Valued Landscapes'. The majority of the district is protected 'Countryside' under current Local Plan policies MTRA4 and CP20 of the current Local Plan Part 1, and Policies DM15 and DM23 of the Local Plan Part 2.</p> <p>As the NPPF does not define what a 'valued landscape' is and contradictions in case law as to what defines a 'valued landscape', the Local Plan will not be seeking to designate 'Valued Landscapes'.</p> <p>Recommended Response: No Change</p>
<p>ANON-KSAR-N8YH-R</p>	<p>There does not seem to be provision in this policy to protect Local Green Spaces - to ensure that they can never be built on. We have so few green spaces - they must be protected in perpetuity.</p>	<p>Comments Noted. Policy NE3 discusses the protection of Open Spaces and this policy ensures there will be no net loss in biodiversity.</p> <p>Recommended Response: No Change</p>
<p>ANON-KSAR-N8YU-5</p>	<p>I support clauses 7.6 and 7.7 stating the need to protect the countryside from unplanned and large scale development. However, there is a need for identification and designation of Valued Landscapes and accompanying policies for their protection. Landscape is not all of equal value. Land that meets the criteria for Valued Landscapes should be expressly designated as such and recognised as of local importance.</p>	<p>General support welcomed.</p> <p>General support welcomed.</p> <p>The NPPF does not require local authorities to designate 'Valued Landscapes'. The majority of the district</p>

		<p>is protected 'Countryside' under current Local Plan policies MTRA4 and CP20 of the current Local Plan Part 1, and Policies DM15 and DM23 of the Local Plan Part 2.</p> <p>As the NPPF does not define what a 'valued landscape' is and contradictions in case law as to what defines a 'valued landscape', the Local Plan will not be seeking to designate 'Valued Landscapes'.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-N8YW-7	<p>There should be NO development on any greenfield site while there are brownfield sites available to develop. Brownfield sites, by their nature, are in or adjacent to conurbations which provide schools, employment and facilities that can be more easily accessed by public transport or on foot than by building in country areas. Power, water and drainage services will be more easily available.</p> <p>However, the greatest concern is that Greenfield sites, once lost, it can not be restored - With World Food Security teetering on a knife edge, the loss of any agricultural land, no matter how poor, is a reduction in this country's resilience against a future when we are going to have to feed the nation and reduce our reliance on food imports which cause food miles, water poverty in other countries and fuels Global Warming. The increasing isolationist policies of all countries, warfare (such as in Ukraine) and weather extremes causing crop failures, are already leading to food shortages and the increased cost of living. It is vital that</p>	<p>Comments Noted. There are not enough brownfield sites available to meet the Plan's housing need.</p> <p>Recommended Response: No Change</p>

	<p>we stop taking away our children's heritage of the British countryside. Not only do green space allow us to choose whether it is used for agriculture, species retention and biodiversity, but also land holds water which reduces flooding, captures carbon, helps reduces global warming and promotes well-being and improves mental health. We lose it at our peril.</p>	
<p>ANON-KSAR-N8Q9-1</p>	<p>The proposed site allocation at Bishops Waltham BW4 would involve the destruction of up to 5Ha of woodland. This is clearly inconsistent with the Council's stated policy of protecting and enhancing biodiversity and the natural environment and accordingly consideration should be given to withdrawing the site from consideration</p>	<p>Comments Noted. Site BW4 has been included in the Local Plan as result of feedback from the Parish Council. The existing woodland has very limited wildlife potential and any proposals would need to accord with Policy NE5.</p> <p>Recommended Response: No Change</p>
<p>ANON-KSAR-N8XZ-9 Denmead Parish Council</p>	<p>Policy NE1 and Policy NE5 call for enhancement of biodiversity. How will this policy ensure that developers/householders do not reduce the diversity before making applications? This happens all the time where hedgerows and trees are removed in advance of a planning application.</p>	<p>Comments Noted. The Council cannot control what an owner of the site removes, but if this were on a protected site then appropriate action would be taken. However, as part of Policy NE5 (Biodiversity Net Gain) would need to take into account what is on the site at the moment and ensure that it delivers an increase in 10% BNG.</p> <p>This would be resolved through either the provision of an ecological report which would accompany a planning application, or the provision of pre-commencement applications.</p>

		Recommended Response: No Change
ANON-KSAR-N8GX-P	In principle I would support the policy but this does not cover pre-application removal of hedgerows and trees which all too often are uprooted prior to any application for development.	<p>Comments Noted. The Council cannot control what an owner of the site removes, but if this were on a protected site then appropriate action would be taken. However, as part of Policy NE5 (Biodiversity Net Gain) would need to take into account what is on the site at the moment and ensure that it delivers an increase in 10% BNG.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-N8XP-Y	It is essential that "valued landscape" is at the top of any discussions about developments as Winchester is surrounded by them!!! The SDNP should be extended Westwards towards Salisbury, or classified as green belt!!	<p>General support welcomed.</p> <p>The NPPF does not require local authorities to designate 'Valued Landscapes'. The majority of the district is protected 'Countryside' under current Local Plan policies MTRA4 and CP20 of the current Local Plan Part 1, and Policies DM15 and DM23 of the Local Plan Part 2.</p> <p>As the NPPF does not define what a 'valued landscape' is and contradictions in case law as to what defines a 'valued landscape', the Local Plan will not be seeking to designate 'Valued Landscapes'.</p>

		Recommended Response: No Change
ANON-KSAR-N8VD-H	<p>Whilst Anchor Properties supports the key principles of Policy NE1 of ensuring that development proposals protect and enhance the natural environment and biodiversity of the district, further consideration must be given to the precise wording of some of the criteria to ensure that the plan is effective and consistent with national policy.</p> <p>Criteria i of Strategic Policy NE1 makes reference to “key species”, “key habitats” and “key habitat type”, yet neither “key species” nor “key habitat” nor “key habitat type” is defined in the plan. It is therefore not clear which species and habitats are key and which are not. The policy needs to be reworded to remove subjectivity and provide certainty for all parties.</p> <p>Criterion (i) fails to acknowledge the provision within paragraph 180 of the NPPF to, as a last resort, compensate for significant harm to biodiversity arising from development. This should be incorporated into criteria (i) of the draft policy.</p> <p>Finally, clarity is also required in relation to criteria (iii) as the phrase ‘Ecological Network’ is not defined in the supporting text or the glossary.</p>	<p>Comments Noted and support for general principles noted.</p> <p>In regards to Criterion I, it is recognised that a footnote to further guidance on ‘key species and habitats’ should be added.</p> <p>Paragraph 180 discusses determining planning applications rather than determining planning policy.</p> <p>In regards to Criterion iii, it is recognised that there needs to be reference to ‘Ecological Network’.</p> <p>Recommended Response: Add source for further information on ‘Key Species/ Habitats’ and ‘Ecological Network’ in the Glossary.</p>
ANON-KSAR-N85N-T	<p>BUT Biodiversity: MAKE IT SIMPLE: every new build should have a garden. WHY HAVE YOU NOT included gardens in New housing development? This is the safest way of gaining children outdoor play space, adults space for reflection and refreshment to aid mental health, space for a diversity of planting, creatures to live.</p> <p>Biodiversity protection of habitats: of gardenbirds, newts, toads and other small animals: people should pay for a licence to own a cat and that cat should wear a bell at all times to warn birds and small</p>	<p>Comments Noted. It is not feasible for every new build property to have a new rear garden (for example flats).</p> <p>It is important that the Local Plan is read as a whole.</p> <p>Recommended Response: No Change</p>

	mammals of their approach– new build gardens are so small that if anyone else has a larger garden cats trespass and kill the birds, newts, toads and other small mammals.	
ANON-KSAR-N81B-A	<p>The draft Local Plan is still not protecting the landscape by utilising the category of Valued Landscapes in this draft Local Plan. It is rejecting the opportunity to be in accordance with NPPF Para 174. The NPPF recognises a hierarchy of landscapes, National Parks, Areas of Outstanding National Beauty, Valued landscapes, landscapes which have demonstrable attributes which take it out of the ordinary. Why then does WCC (Local Parish Meeting Nov 15th) declare that Valued Landscapes do not matter, (if some areas are valued, then what about all the rest). If judgements in the courts recognise valued landscapes, if the NPPF recognises them, if other neighbouring local authorities recognise them, why is WCC standing alone in refusing to use the designation to defend and protect the landscapes which ring our beautiful city? Our landscapes are less strongly protected against unwanted and inappropriate development as are similar landscapes in, for instance East Hampshire, which is using Valued Landscapes designation as protection against inappropriate development.</p>	<p>General support welcomed.</p> <p>The NPPF does not require local authorities to designate ‘Valued Landscapes’. The majority of the district is protected ‘Countryside’ under current Local Plan policies MTRA4 and CP20 of the current Local Plan Part 1, and Policies DM15 and DM23 of the Local Plan Part 2.</p> <p>As the NPPF does not define what a ‘valued landscape’ is and contradictions in case law as to what defines a ‘valued landscape’, the Local Plan will not be seeking to designate ‘Valued Landscapes’</p> <p>Recommended Response: No Change</p>
ANON-KSAR-N819-1	<p>Fully support iii and v.</p> <p>vi. End of para - ADD</p> <p>Plus assists the mitigation of carbon emissions and adaptation to climate change.</p>	<p>Support for Point iii and v welcomed.</p> <p>In regards to the addition to Point vi, Policy CN1 (Mitigating and adopting to Climate Change) sets out the Council’s policy on climate change which any development proposal would need to adhere to.</p>

		Recommended Response: No Change
ANON-KSAR-N8WC-H	<p>I would strongly support a Local Plan that provides for a sustainable approach to the siting of development, giving priority to brownfield land. This requires high quality design in order to maintain local character whilst protecting the landscape and amenity value of the area.</p> <p>I support clauses 7.6 and 7.7 stating the need to protect the countryside from unplanned and large scale development.</p> <p>It is an issue of some concern, given that Oliver’s Battery is surrounded by Valued Landscapes, that WCC is taking this line, in not distinguishing the quality of landscapes, as proposed by NPPF and supported by the Courts. It leaves the areas around our Parish less strongly protected against inappropriate development as similar landscapes in East Hampshire.</p>	<p>General support welcomed.</p> <p>The NPPF does not require local authorities to designate ‘Valued Landscapes’. The majority of the district is protected ‘Countryside’ under current Local Plan policies MTRA4 and CP20 of the current Local Plan Part 1, and Policies DM15 and DM23 of the Local Plan Part 2.</p> <p>As the NPPF does not define what a ‘valued landscape’ is and contradictions in case law as to what defines a ‘valued landscape’, the Local Plan will not be seeking to designate ‘Valued Landscapes’</p> <p>Recommended Response: No Change</p>
BHLF-KSAR-N8R5-X Twyford Parish Council	<p>There should be a new bespoke freestanding policy for the Itchen and its Valley within the NE policies. In the Draft WDLP the Itchen River and Valley is covered by numerous generic policies in the Natural Environment chapter i.e.: NE 1; 3-10; 13-17.</p> <p>The Itchen is a functioning ecosystem of international importance; it should be treated as such for planning and other administrative purposes. Moreover, the Itchen is under threat from a variety of factors. The river and its valley are sufficiently important to merit a policy of their own to bring together this wide range of considerations. Coordination with adjoining authorities is essential.</p>	<p>Comments Noted. Whilst it is accepted that the River Itchen is an important from a wildlife and ecological perspective, no further information has been provided on what this policy could deal with and it would be protected in any event under Policy NE4 and other legislation.</p>

	Ideally this new policy should be prepared jointly with SDNPA, Twyford and possibly also Eastleigh, but this may be at a second stage.	Recommended Response: No Change
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Comments which did not answer NE1- protecting and enhancing biodiversity and the natural environment in the district		
Respondent number	Comment	Officer comment
BHLF-KSAR-N8RV-Y	<p>2. Environment</p> <p>a) Building on current green fields would reduce both local wildlife habitat and the variety of natural life found there. (e.g., GRN, Slowworms, English bluebells & Ancient grasses).</p> <p>b) Destroying adjoining green spaces would have a negative impact on highly important local countryside views and the quick, easy access to rural rights of way currently enjoyed.</p> <p>c) The sense of winding-down and wellbeing that comes from travelling along green leafy roads and spending time in the immediate countryside would be severely damaged by further destruction of adjacent countryside.</p>	<p>Comments Noted. The policy ensures that there will be no net loss of biodiversity on sites.</p> <p>Recommended Response: No Change</p>
BHLF-KSAR-N8RU-X	<p>'The environment' has shot up to the very top of political and social agendas in recent times. MTRAs get their 'value' from their landscapes, the community's 'sense of place', with opportunities for proven physical and mental health benefits and localised economies. A 'landscape-led approach' starts with people and how they live, then spaces and places that support this, and lastly at specific housing allocations. This maintains character, distinctiveness, natural and built heritage & amenity value, protects tranquility and dark skies for people and for wildlife.</p> <p>This consultation says it is strongly protective of the natural environment. It envisages that the District's natural beauty, biodiversity and cultural heritage will be enhanced but needs to be clarified, go</p>	<p>General support welcomed.</p> <p>The NPPF does not require local authorities to designate 'Valued Landscapes'. The majority of the district is protected 'Countryside' under current Local Plan policies MTRA4 and CP20 of the current Local Plan Part 1, and Policies DM15 and DM23 of the Local Plan Part 2.</p>

	<p>further; how will this be achieved through the planning process and other initiatives?</p> <p>Our rare, internationally recognised and protected chalk streams (SSSIs, SACs, etc.), including the river Arle, for example, have a world-wide reputation and are part of our precious natural heritage. Together with many built heritage assets they are of great community value as well. They encourage people into the outdoors – often using local routes on foot ('walking for wellbeing') or bicycle. These landscapes also encourage business for sectors still hit hard by the pandemic, especially in the leisure sector, key to local economies throughout the District.</p> <p>Such valued landscapes are not the same as designated landscapes (AONBs or National Parks such as SDNP), of course. But are not 'ordinary countryside' either and so should have more policy protection beyond 'character assessment' and so safeguard visual amenity, social, cultural, historic, heritage and economic benefits and secure habitats and biodiversity. It is a significant piece of work to develop appropriate criteria, evaluate and identify them but important in so many ways.</p> <p>We would, therefore, strongly support CPRE Hampshire's proposals to create a map of 'valued landscapes' in the District. It is also possible that the plan risks not being found 'Sound' at Examination if it does not comply with NPPF 2021 on matters such as 'valued landscapes'.</p> <p>In summary, we are pleased that many points in the Regulation 18 proposals reflect issues raised by the Society in response to the last consultation in April 2021. Nonetheless, we re-emphasise the following so that proposals are made more explicit.</p> <ul style="list-style-type: none"> • Housing numbers in the MTRAs are unnecessarily high. • Winchester City needs regeneration and presents excellent opportunities to do so. • In all cases, policies should really, really focus on previously 	<p>As the NPPF does not define what a 'valued landscape' is and contradictions in case law as to what defines a 'valued landscape', the Local Plan will not be seeking to designate 'Valued Landscapes'</p> <p>Recommended Response: No Change.</p>
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	<p>developed and under-utilised land and buildings – a great deal is available – and encourage ‘build out’ of existing permissions.</p> <ul style="list-style-type: none"> • Further clarification is needed on commitment to social rented housing and where provided. • Careful choices and effective delivery (including measurement and monitoring) will provide multiple, significant opportunities to reduce carbon emissions but development in the countryside with the requirement for new infrastructure and damage to the natural environment is contradictory. • Strengthened protection for the countryside is still required; the pandemic emphasised the importance of our environment - the natural world - and how, if properly protected, it contributes so significantly to human health, well-being, habitats and biodiversity. 	
<p>BHLF- KSAR- N8BQ-A Historic Environment Link here</p>	<p>Para 7.5 object - The countryside should also be regarded as a historic asset, which the Plan does later acknowledge. In this paragraph it may be simpler to refer to the countryside as a key asset.</p> <p>The district’s countryside is a key natural asset, sustaining biodiversity, offering tranquillity and providing an important resource for carbon storage - full doc in SP for mark ups</p>	<p>Comments Noted. It has been acknowledged that the Countryside is a key natural asset and it is considered that adding ‘historic’ would be acceptable.</p> <p>Recommended Response: Add to paragraph 7.5:</p> <p>The district’s countryside is a key natural asset, sustaining biodiversity, offering tranquillity and providing an important resource for carbon storage which has been shaped and developed over the years by various historic activities. It provides for agriculture and rural businesses, as well as tourism and leisure activities. It comprises a range of landscape types</p>

		including chalk downland, river valleys, and farmed agricultural areas interspersed with villages, hamlets and some larger market towns as well as the city of Winchester.
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Comments from other topics		
ANON-KSAR-N8MB-6	<p>Sports facilities and associated ancillary facilities should be located in sustainable locations which seek to reduce vehicle trips and encourage active travel modes. It is therefore important that new facilities have EV charging points; cycle parking or storage; and that they provide safe and secure environment for users to make the most of these active travel opportunities especially where sports facilities are often accessed and used in the evenings (which is the peak period for community sport along with weekends).</p> <p>Sport England welcomes the recognition of the role open space plays in supporting multi-functional use. It would be helpful if sport (formal and informal) and recreation can be explicitly added to the list of potential uses within the policy. Providing adequate shading and preventing overheating has benefits in providing opportunities to enable the community to remain physically active during extreme weather.</p>	<p>Comments Noted and general support welcomed. It is important that the Local Plan is read as whole. Policy NE1 is an overarching policy on protecting the biodiversity and natural environment.</p> <p>Recommended Response: No Change.</p>
ANON-KSAR-NKZ5-S	<p>Council activities have an impact on the natural environment just as they do on carbon emissions. Councils are required by the Environment Act to develop Local Nature Recovery Strategies. To do this requires a report on the State of Nature in the district.</p>	<p>Comments Noted. Local Nature Recovery areas are referred to as an element of Policy NE5.</p> <p>Recommended Response: No Change</p>

	Without the Local Nature Recovery Strategies and a State of Nature report in the district then the monitoring of this Policy and the Plan cannot be determined.	
ANON-KSAR-NK6B-2	I am actually pointing out that there is no mention of green sites in Winchester which I was hoping to see. (not sure which category to put this)	Comments Noted. This is not a matter for this policy. Recommended Response: No Change
ANON-KSAR-NKB4-Z	Changes in brackets 156WINCHESTER DISTRICT LOCAL PLANBIODIVERSITY AND THE NATURAL ENVIRONMENTThe Local Planning Authority will permit development that maintains, protects and enhances biodiversity across the district, delivering a minimum of 10% measurable net gain in biodiversity to be maintained for a period of 30 years in accordance with the Environment Act; (who monitors this requirement and what sanctions apply if a developer fails to comply. It may be a single house which may change ownership many times over the 30 year period.) and i.Protects sites of international, European, and national importance, and local nature conservation sites and SINCS, from inappropriate development;ii.Supports habitats that are important to maintain the integrity of European sites;iii.Shows how biodiversity can be retained, protected and enhanced through its design and implementation, for example by designing for wildlife, delivering measurable BNG and BAP targets and enhancing Biodiversity Opportunity Areas, Local Ecological Networks/Local Nature Recovery Areas and include a management plan for a period of 30 years;iv.New development will be required to avoid adverse impacts, or if unavoidable ensure that impacts are appropriately mitigated (This is a loophole for offsetting and should be redrafted), with compensation measures used only as a last resort. Development proposals will only be supported if the benefits of the development clearly outweigh the harm to the habitat and/or	Comments Noted

	<p>species;Policy NE5 Biodiversity v.Maintains a district wide network of local wildlife sites and corridors to support the integrity of the biodiversity network, prevent fragmentation, or prevents and reverses fragmentation and enable biodiversity to respond and adapt to the impacts of climate change;vi.Supports and contributes to the targets set out in the district’s Biodiversity Action Plan (BAP) for priority habitats and species;vii.Provides up to date information, evidence and relevant assessments or surveys (in line with CIEEM guidance);viii.Where there is evidence of the deliberate clearing of habitats before the application process or the deliberate neglect or damage to any of the habitats and species on the site the subsequently reduced biodiversity value the deteriorated condition will not be taken as the baseline for the purposes of calculating BNG and the previous ecological status of the site will be used to decide the acceptability of any development proposals and</p>	
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	Recommendations	Officer response
Comments from SA	<p>Policy NE1 could be strengthened by requiring that development does not harm/degrade the green infrastructure network or result in its fragmentation. A cross reference to the relevant green infrastructure policy might be included. The policy already includes a requirement not to harm/degrade the Ecological Network or result in its fragmentation which provides less direct protection for the green infrastructure network.</p>	<p>Criteria i of Policy NE1 already refers to ‘avoids significant harm to the natural environment, biodiversity and geodiversity’ – in this respect that is already covered. Again, the second point is covered in criteria i.</p>
	<p>Policy NE1 could be further strengthened by including reference to the requirement to demonstrate biodiversity net gain. A cross reference to the relevant biodiversity net gain policy can be included.</p>	<p>It is important to read the LP as a whole as there is already separate policy on BNG (Policy NE5) and this requirement is in any event now covered by the Environment Act.</p>

Comments from HRA	Policy NE1: Protecting and enhancing biodiversity and the natural environment in the district' is amended to: Specifically mention the potential for effects on FLL (around River Hamble and River Itchen). Indicate that developments need to consider the impacts (of European sites and FLL) in proximity to the Itchen and Hamble; the policy / supporting text could list all potential effects, for completeness.	Comments noted. Recommended Response: Additional text added to Policy NE5 in relation to the impacts on FLL. Additional paragraph to supporting text of NE5 to includes effects on FLL.
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Amendments to the supporting text

Paragraph 7.1

The council has declared a Climate Emergency and has set an ambition for the wider district to become carbon neutral by 2030. **The Council has also agreed a motion on the nature emergency. The Local Plan has an important role in ensuring that nature based solutions are a keep part of the plans to tackle the climate emergency.** Allied to this, a high quality natural environment is a key contributor to sustainable development and can support a wide range of biodiversity and contributes to human health and wellbeing.

Paragraph 7.5

The district's countryside is a key natural asset, sustaining biodiversity, offering tranquillity and providing an important resource for carbon storage **which has been shaped and developed over the years by various historic activities.** It provides for agriculture and rural businesses, as well as tourism and leisure activities. It comprises a range of landscape types including chalk downland, river valleys, and farmed agricultural areas interspersed with villages, hamlets and some larger market towns as well as the city of Winchester.

Amednements to policy

Development will only be permitted where it demonstrates that it will protect and enhance the natural environment and biodiversity including the natural beauty of the landscape, all natural resources, habitats and species; and

i. Avoids significant harm to the natural environment, biodiversity and geodiversity or can adequately mitigate any harm arising and can clearly demonstrate that there will be no adverse impact on the conservation status of key species, **internationally protected sites**, nationally protected designated sites, or locally designated sites and there will be no net loss or deterioration of a key habitat type including irreplaceable habitats and the integrity of linkages between designated sites and key habitats;

ii. Safeguards features of the natural environment and nature conservation interest and **makes nature based solutions part of the plans to tackle the climate emergency. These** should include measures to retain, conserve and enhance habitats, including, **internationally**, nationally and locally designated sites, priority habitats, networks of ecological interest, ancient woodland, water features, hedgerows and wetland pastures as corridors and stepping- stones for wildlife;

iii. Does not harm/degrade the Ecological Network or result in its fragmentation;

iv. Development which would result in the loss or deterioration of irreplaceable habitats, including ancient woodland and ancient or veteran trees, will only be permitted in exceptional circumstances where the public benefit would clearly outweigh the loss or deterioration and where a suitable compensation strategy exists;

v. Normally any mitigation, compensation and enhancement measures are required to be delivered on-site, unless special circumstances dictate that off-site **mitigation or** compensation is more appropriate. A financial contribution - in lieu of on-site mitigation - will only be considered in **limited** circumstances and where it is demonstrated that the proposed mitigation is deliverable and effective; and

vi. Protects, conserves and enhances ecology and the air and water environments in the district.