

Missing policy - Biodiversity and the natural environment

Respondent number	Comment	Officer comment
ANON-KSAR-NK1G-2	<p>Horizon Leisure Centres would like to see the sport and recreation policy considered as a key theme that crosses over between other policy areas, rather than only appearing in the Biodiversity and natural environment section. For example, a range of community health and fitness programmes and leisure centre facilities that are accessible and inclusive to all ages, abilities, and backgrounds, contributes to healthy communities for their physical and mental wellbeing. Outdoor activities such as boot camps and health walks benefit from green areas and enable residents to use their leisure time in a welcoming environment. Increased population and housing require sport and leisure facilities as part of their infrastructure to lead healthier, happier lives.</p> <p>For example, Horizon is aiming to develop Waterlooville Leisure Centre to include all-weather pitches, modernised health and fitness facilities, and family play, to engage with people locally and in neighbouring boroughs to stay more active.</p>	<p>Comments noted.</p> <p>The plan should be read as a whole. Recreation is a key objective that runs throughout the plan in several policies include SP3, D5, etc (the list is not exhaustive).</p> <p>Recommended Response: No Change.</p>
ANON-KSAR-NK79-T	<p>I think there should be a new Green Belt in South Hampshire. There was significant support for this policy in the previous WCC consultation alongside Option 5 as promoted by CPRE Hampshire and Save South Winchester. The housing numbers allocated for the southern parishes are misleading as many of the MTRA sites are also within the PfSH sub-region. WCC should not be taking any housing from PfSH and should be</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 the requirement to demonstrate why normal planning and development management policies would not be</p>

	designating a new Green Belt to protect the remaining open areas of countryside in this highly pressured area.	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. Recommended Response: No Change.
ANON-KSAR-NKF6-6	The movement of earth and soil whilst covered by HCC Minerals and Waste policies WCC should take a more active role with the regards to the impact of such developments on the biodiversity and drainage impacts.	Comments noted. The Plan should be read as a whole, and this is covered by Policies NE1 and NE6. Recommended Response: No Change.
ANON-KSAR-NKJB-P	I deplore the apparent omission of Local Green Space designations to undeveloped, biodiverse localities in Winchester currently used for recreation. Given the recently-demonstrated willingness to ride roughshod over local opinion with regard to the old leisure centre site, I am particularly concerned that North Walls Park will not receive the level of protection from development that LGS would provide.	Comments Noted. Policy NE3 discusses the protection of Open Spaces and this policy ensures there will be no net loss in biodiversity. Recommended Response: No Change
ANON-KSAR-N8NY-X	I don't think the plan mentions a South Hampshire Green Belt, which would give essential protection to the countryside to the south and west of the city, and which many have advocated.	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 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

		<p>identification of a proposed new Green Belt is not being progressed.</p> <p>Recommended Response: No Change.</p>
<p>ANON-KSAR-N85G-K</p>	<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. Ideally this new policy should be prepared jointly with SDNPA, Twyford and possibly also Eastleigh, but this may be at a second stage.</p>	<p>Comments noted. The River Itchen SAC is covered in detail in the Biodiversity and Natural Environment Section of the Plan.</p> <p>Recommended Response: No Change.</p>
<p>ANON-KSAR-N81F-E</p>	<p>Bargate Homes consider that a policy supporting strategic solutions to the mitigation of nutrient neutrality should be provided, in addition to the provisions of NE16, in response to Key Issue vii of Biodiversity and the Natural Environment. This would be to support schemes that provide mitigation for multiple developments</p>	<p>Comments noted. Policy NE16 covers nutrient neutrality which supports strategic mitigation schemes. In addition, the Council have produced a Nutrient Neutrality Topic Paper which sets out the strategic mitigation schemes available to schemes within the plan area.</p> <p>Recommended Response: No Change.</p>

ANON- KSAR- N81T-V	<p>There is a need for a Policy on small green spaces such as verges and Triangles/squares in villages being protected without each one having to be separately identified. Granting a change of use from public amenity to private residential amenity should only be permitted if the relevant parish council is supportive because it would result in a greater public benefit.</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>
ANON- KSAR- NK66-P	<p>Local Green Spaces</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>
ANON- KSAR- NKKV-B	<p>Phosphorus is both a non-renewable (once it enters rivers and the ocean) strategic resource and an essential component of all lifeforms as well as a contributor to habitat degradation through eutrophication. Winchester District must develop a plan to monitor the import (as fertiliser) and loss of this resource through erosion and runoff. Planning for additional wetlands will reduce discharge into waterways.</p>	<p>Comments noted. Policy NE16 of the Local Plan discusses the impacts of phosphorus in waste water emanating from overnight development. The policy ensures that no development will be granted planning permission until demonstrating that it is 'nutrient neutral'.</p> <p>Recommended Response: No Change.</p>
ANON- KSAR- N85N-T	<p>PRIVATE FAMILY GARDENS This should be a requirement for all new housing -</p> <ol style="list-style-type: none"> 1. to provide safe play areas 2. to provide refreshment for stressed adults 3. to provide sanctuary for birds and other wildlife and preserve diversity of planting and habitat. Other open spaces are often down to well trodden grass that is too small for any worthwhile play. Littleton is a wonderful exception. so is River Park. Both should be preserved. 4. to help maintain the water table. Any areas.of planting 	<p>Comments noted. The Council's High Quality Places Supplementary Planning Document (SPD, adopted in 2015 provides guidelines for the layout of private amenity space for new housing.</p> <p>Recommended Response: No Change.</p>

	will absorb rain fall which should move towards maintaining the water table.	
ANON-KSAR-NKKV-B	Soil is an essential resource for farming and therefore to the local economy of Winchester District as well as being a natural carbon store. In the absence of national monitoring Winchester District should monitor erosion for things such as cover crops and evidence of soil loss.	Comments noted. The Plan should be read as a whole, and this is covered by Policies NE1 and NE6. Recommended Response: No Change.
ANON-KSAR-N85G-K	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. 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. Ideally this new policy should be prepared jointly with SDNPA, Twyford and possibly also Eastleigh, but this may be at a second stage.	Comments noted. The River Itchen SAC is covered in detail in the Biodiversity and Natural Environment Section of the Plan. Recommended Response: No Change.

Moved from other missing policy topics

ANON-KSAR-NKWX-S	Within the commentary there is no scope to respond to or comment on the NE3	Comments Noted. The Regulation 18 Local Plan was available on the Council's website. The online consultation on citizen space allowed consultees the opportunity to comment and respond to every policy
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		(including Policy NE3) in the Plan. Recommended Response: No Change.
ANON-KSAR-NK66-P	There is no mention of Local Green Spaces. I feel that current green spaces that are used for recreation should be listed as Local Green Spaces to protect their status. EG St Matthews Field is a much used local green space. It is used for sport, exercise, Walking, Dog Walking and general relaxation. It should not be difficult to identify the current parks that re used in this way. It should not be incumbent on local communities to have to apply for local Green Space protection after the local plan has been published. They should be included in the plan	Comments Noted. Policy NE3 discusses the protection of Open Spaces and this policy ensures there will be no net loss in biodiversity. Recommended Response: No Change
ANON-KSAR-NK6B-2	There is no mention of green sites for public access in Winchester area	Comments Noted. Policy NE3 discusses the protection of Open Spaces and this policy ensures there will be no net loss in biodiversity. Recommended Response: No Change
ANON-KSAR-NK67-Q	There appears to be no mention of protecting areas currently used for outside sporting activity. This is vital for the health both physical and mental of all users. In the case of Winchester Rugby Club and its 1300 members , we use all of North Walls Park including Devils Island and our three pitches as well obviously and the space is vital to us functioning . These areas and other areas such as King George V playing fields must be protected for the reasons stated.	Comments noted. Policy NE3 discusses the protection of open space, sport and recreational facilities in the district. The policy ensures that there is no net loss of open space, sports and creational facilities. Recommended Response: No Change

<p>ANON-KSAR-NKZ5-S</p>	<p>Creating these new Policies and/or SPDs is recommended to support the Local Plan and aid clarification on some key issues where detail and explanation is not available elsewhere. This will ensure a coherent approach to understanding and application of the Plan with its related sections.</p> <p>1.) Protection of Mature Trees</p> <p>2.) Land for offsetting - Link to Nature based Solutions SPD.</p> <p>3.) Climate Change and Sustainable Construction Supplementary Planning Document (SPD). - Suggest creating something similar to: download (easthants.gov.uk)</p> <p>4.) Nature-based Solution</p> <p>Each Policy or SPD can be enhanced with A Technical Advice Note (TAN) If required, I can offer some help to create the above.</p>	<p>Comments noted.</p> <p>Policy NE15 discussed the protection of special trees and ensures that these will only be permitted in exceptional circumstances.</p> <p>The Plan should be read as a whole. Nature based solutions is a key theme throughout the plan and further reference has been included in the Regulation 19 plan.</p> <p>The Plan includes several policies on climate change which look to address the climate emergency declared in the district.</p> <p>Recommended Response: include reference to nature based solutions where relevant.</p>
<p>ANON-KSAR-N819-1</p>	<p>Exactly as ANON-KSAR-NKZ5-S with the addition of the below:</p> <p>5.) Whole-Life Carbon</p> <p>6.) GIS and rich spatial data Something needs to be said upfront about how the Local Plan will know it is achieving the optimal development and investing decisions with the right carbon</p>	<p>Comments noted.</p> <p>An additional policy on embodied carbon (CN8) has been included in the Regulation 19 plan.</p>

	<p>emission reduction and biodiversity protection. How will WCC track the impact of Local Plan decisions in a transparent manner to reassure the public the right balanced decisions are made in delivering the Local Plan? These questions highlight the need for a more digital friendly approach to understand and support the Plan with the use of Digital technologies for everyone. These means adopting the widest use of GIS data maps underpinned with good data. Evidence shows this approach will help reduce carbon emissions by up to 15% - one-third of the 50% reduction required by 2030</p>	<p>All policies will be monitored upon adoption of the Plan. The plan sets out the monitoring framework and theses will be monitored on an annual basis through the Authority Monitoring Report (AMR).</p> <p>Recommended Response: No Change.</p>
<p>ANON-KSAR-NK29-N</p>	<p>As above, but copied in full as provides more detail Several Supplementary Planning Documents are recommended to support Local Plan and aid clarification on needs to optimise the Plan. Suggestions with some topics for content are shown below: 1. Supporting renewable energy in the Local Plan • Require new builds to maximise onsite renewable generation (not to achieve a minimum). If onsite renewable generation insufficient for a Development – create opportunities to optimise with local renewable energy schemes, ideally Community Energy schemes. Where costs and/or planning do not allow installation of such schemes, developers should contribute (pay) for grid upgrades to future proof Community Energy at a later stage. • Create WCC Policies and Technical Advice, similar to Community-led Renewables Technical Advice Note (southdowns.gov.uk) o to support solar farms, wind farms, energy storage facilities, anaerobic digestors o Including agrivoltaic guidance • Publish simplified planning guidance on rooftop solar for permitted development, listed homes, conservation areas, etc. • Include a statement of community engagement to explain how it will engage</p>	<p>Comments noted.</p> <p>Policy CN5 is a permissive policy to support the delivery of renewable energy schemes.</p> <p>Nature based solutions is a key theme throughout the plan and further reference has been included where relevant in the Regulation 19 plan.</p> <p>An additional policy on embodied carbon (CN8) has been included in the Regulation 19 plan.</p> <p>Policy NE15 discussed the protection of special trees and ensures that these will only be</p>

	<p>with communities, businesses & organisations in the planning process.</p> <p>2. Nature based Solutions - green ratio and biodiversity/ecosystem services</p> <ul style="list-style-type: none"> • Nature-Based Solutions Actions to protect, sustainably manage, and restore natural and modified ecosystems that address societal challenges effectively and adaptively, simultaneously benefiting people and nature. They work by increasing the quantity and quality of natural capital stocks and can enhance biodiversity. Networks can be considered components of Blue-Green Infrastructure. E.g., natural flood management, SuDS and arable reversion • Can also include policy to maintain and enhance green spaces - protect existing ecosystems, restore and connect previously degraded ecosystems • Specifying natural building products and materials under accepted standards. <ul style="list-style-type: none"> o For example, London Energy Transformation Initiative (LETI) – Embodied Energy Carbon Primer - App.8 - Materials guide 252d09_8ceffcba9db43cf8a19ab9af5073b92.pdf (leti.uk) + WinACC SuperHomes advice note: ‘Choosing nature based building products and materials’. o Urban opportunities should not be overlooked IGNITION - Greater Manchester Combined Authority (greatermanchester-ca.gov.uk) • Nature recovery is as crucial to our wellbeing as the elimination of carbon emissions and adaptation to changed climate. <p>3. Climate Change and Sustainable Construction Supplementary Planning Document (SPD).</p> <ul style="list-style-type: none"> • Suggest creating something similar to: download (easthants.gov.uk) • To include Energiesprong UK for Whole Building Retrofits at scale and speed. <p>4. Land for offsetting</p> <ul style="list-style-type: none"> • Link to Nature based Solutions SPD. • In exceptional circumstances offsetting can be acceptable where no alternative in the immediate locality is available to achieve carbon net zero. • Offsetting schemes must be regulated and combined with optimal NbS high 	<p>permitted in exceptional circumstances.</p> <p>Recommended Response: include reference to nature based solutions where relevant.</p>
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	<p>standards of implementation and management to ensure they deliver optimal climate and biodiversity benefits.</p> <ul style="list-style-type: none"> • A highish (35%) uplift In Building Regs with residual carbon dealt with through payments to a carbon offset fund to pay for renewable energy and energy efficiency measures elsewhere can set a dangerous ‘greenwash’ precedent. • Care is needed to ensure loopholes are avoided, as avoided emissions do not reduce carbon in the atmosphere to close the impact ‘gap’! Offset loopholes must be closed especially for allowable solutions where developers use carbon offsets to avoid environmental obligations • Only permanent carbon sequestration can reduce climate change Greenhouse Gas • Emissions and protect biodiversity and alternative approached must be strongly justified. • Need to ensure any offsets sequester as opposed to avoid carbon! • Incredible performance and efficiency with natural building materials can be achieved. It’s all about simplicity and it’s scalable. Super-sustainable development is no more expensive than traditional building, and with the right level of material recycling so much can be achieved to offset the rising cost of new materials. <p>5. Protection of Mature Trees</p> <ul style="list-style-type: none"> • A complementary policy to protecting Veteran trees is needed in the face of the environmental crises. • This SPD could be combined with Nature-based Solutions 	
<p>ANON-KSAR-NK29-N</p>	<p>Foreword – The Biodiversity Crisis is concurrent and interdependent with the Climate Crisis and should be referenced alongside the Climate Change crisis. Both crises need to be front and centre of the Local Plan to ensure all polices - actual or emerging - are considered for all place making decisions for people, communities and nature. Planning and designing for carbon neutrality and adapting to Climate Change needs to include considerations of nature-based solutions and explicitly whole life carbon. A change to mitigate/adapt to Climate Change has consequences for Biodiversity and vice versa.</p>	<p>Comments noted.</p> <p>The Regulation 19 Local Plan now specifically references the nature crises as well the climate change crisis.</p>

		<p>Recommended Response: Reference to nature crisis added to the plan.</p>
<p>ANON-KSAR-NKXV-R</p>	<p>There is no policy on Food Security or efficient Land Use</p> <p>Food Security has been shown by the situation in Ukraine to be as important as energy security. It can also have a significant effect on reducing our District's food miles and therefore make a big contribution to our desire to be carbon neutral.</p> <p>We should be encouraging carbon sequestration through efficient and effective farming methods and encouraging our landowners to actually produce food rather than waiting for a developer to increase the value of their landholding from development.</p> <p>We should also consider effective land use within our policies somewhere. Solar farms are notoriously ineffective use of agricultural land. An 85 acre site of solar panels will produce less power than one single wind turbine. We could instead use those 85 acres (if on agricultural land) for food production and sequestration of carbon. Solar panels only produce power when the country least needs it (summer and daytime). In the peak usage time of 4-7pm in the winter, it produces nothing. Battery storage only generally stores power for 1 hour and in the winter, panels would not produce sufficient excess energy for storage anyway. I would urge you to look at https://www.solar.sheffield.ac.uk/pvlive/ and see how ineffective solar is at solving our issues of energy need.</p> <p>In the House of Lords Land use in England Committee report published on 13th December 2022 (https://committees.parliament.uk/publications/33168/documents/179645/default/) they concluded:</p>	<p>Comments noted.</p> <p>The Local Plan should be read as a whole. Policies CN1 and D6 set out the process for effective use of land and enabling local food production</p> <p>Recommended Response: No Change.</p>

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

133. Energy and other large-scale infrastructure projects should be incorporated into a land use framework. The Land Use Commission would be tasked with doing this in close cooperation with relevant bodies including the National Infrastructure Commission."

Central government direction is towards the development of a proper land use framework.