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Submitted to Winchester District Local Plan 2019-2039: Regulation 18 Consultation
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Name of respondent (or client): :
Daniel Lee

3 If you are representing an organisation or acting as an agent, please provide the name below.

Organisation/Agent::
Winchester Action on Climate Change (WinACC) (Please link to other WinACC submissions)

4 What is your address?

If you are responding on behalf of an organisation please put the organisation's address below. If you are acting as an agent please put the company address below.:
Winchester Action on Climate Change

House number/name::
University of Winchester

Street address 1::
Sparkford Road

Street address 2::

Town/area::
Winchester

Postcode::
SO22 4NR

Contents

Please select the area that you would like to comment on:

I Think There is a Policy Missing

Monitoring Framework

Please click on the monitoring framework area that you wish to comment on:

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Monitoring Framework: Strategic Policy

SP1 Do you agree with the way strategic policy SP1 - vision and objectives, will be monitored?

No, I don’t agree

If no, please explain how the monitoring for this policy should be amended?:

No because the 'the Vision' needs to take account of the missing links between the interdependent Climate and Biodiversity crises.

Meaning of the term ….’built to net zero’ needs qualification. Does this mean operational carbon or whole life carbon which includes embodied carbon. Suggest it must mean both to ensure a more optimal approach to help to mitigate the climate and biodiversity crises together in order to get to as close to net environmental impacts.

For clarity, please provide web links to each policy in the evidence base on which the Plan is based on and that suggested missing elements/polices and Plans, i.e.,

- COP15: What Can You Expect from the UN Biodiversity Conference - Bloomberg
- Proposal — Part Z (part-z.uk)
- 252d09_8ceffcbcafdb43cf8a19ab9af5073b92.pdf (leti.uk) - page 12 LETI Embodied Carbon Primer
- House of Lords - Nature-based solutions: rhetoric or reality? - The potential contribution of nature-based solutions to net zero in the UK - Science and Technology Committee (parliament.uk)
- Enabling a Natural Capital Approach - data.gov.uk
- What nature can do for you - GOV.UK (www.gov.uk)
- IGNITION - Greater Manchester Combined Authority (greatermanchester-ca.gov.uk)
- Carbon Neutrality Plan
- Biodiversity Action Plan

Worryingly, this Plan is not sufficiently future proofed to take into account the emerging changes from International environmental agreements (e.g., COP26/COP27 and COP15) and other potential National legislation, e.g., Environment Audit Select Committee (EAC) report need for Net Zero 'Part Z' for Building Regulations which goes further than the LETI Energy standard which does not address Whole Life Carbon. This includes the Government's commitment to domestic targets that will require nature-based solutions (NbS) to be deployed at scale .

Para 3.2 Needs to reflect the comments above

Page 22 – Outlined dotted box needs to to reflect the the missing reference to the dual Climate and Biodiversity crises.
Suggest title amend:

'Tackling the climate and biodiversity emergencies and creating a greener district at the same time'.

Para 3.2 Needs to reflect the comments above

Page 22 – Outlined dotted box needs to to reflect the the missing reference to the dual Climate and Biodiversity crises.
Suggest the title is amended to:

'Tackling the climate and biodiversity emergencies and creating a greener district at the same time'.

para 3.7 lists the Plan's objectives for tackling the climate emergency and creating a greener district. Objective vii refers to maximising the use of low carbon infrastructure and construction etc. This should be clarified to ensure that it includes renewable energy generation, Nature-based Solutions and future adoption of whole life carbon standards.

Embodied carbon emissions make up a large fraction of the total carbon emissions from construction, often 20-50% of the whole life (embodied + operational) carbon emissions of a new building. Embodied carbon is already a considerable proportion and will only increase as the thermal standards of new buildings improve.

It is also important to remember that unlike operational carbon emissions the embodied energy and carbon once 'spent' cannot be reversed. Once released the opportunity for improvement has passed. In contrast, operational emissions in buildings can be improved at any point in the lifetime of a building, for example by implementing a range of energy efficiency measures. Embodied carbon cannot be improved.

The importance of embodied carbon considerations is therefore becoming clear, and it can easily be reduced by 10-20% without increasing capital costs and should therefore be included at the outset of the design process & .

Given the above, the objectives need to include monitoring of the impacts from the concurrent and interdependent Climate and Biodiversity crises to/from the Plan. To include the amount of whole life carbon emissions reductions and the additional biodiversity net gain beyond that required through regulation from any development. Use of Nature-based solutions is need to deliver the additional benefits for both mitigation and adaptation to the crises.
It is understood WCC has the flexibility to go beyond the mandatory requirements under 2012 Regulations for local authorities to decide what should be monitored.

Do you agree with the way strategic policy SP2 - spatial strategy and development principles, will be monitored?

No, I don't agree

If no, please explain how the monitoring for this policy should be amended?:

The objectives need to include monitoring of the impacts from the concurrent and interdependent Climate and Biodiversity crises to/from the Plan. To include the amount of whole life carbon emissions reductions and the additional biodiversity net gain beyond that required through regulation.

It is understood WCC has the flexibility to go beyond the mandatory requirements under 2012 Regulations for local authorities to decide what should be monitored.

Do you agree with the way strategic policy SP3 - development in the countryside, will be monitored?

No, I don't agree

If no, please explain how the monitoring for this policy should be amended?:

The objectives need to include monitoring of the impacts from the concurrent and interdependent Climate and Biodiversity crises to/from the Plan.
To include the amount of whole life carbon emissions reductions and the additional biodiversity net gain beyond that required through regulation.

It is understood WCC has the flexibility to go beyond the mandatory requirements under 2012 Regulations for local authorities to decide what should be monitored.

Where would you like to go next?

I would like to go back to the monitoring framework contents page

Monitoring Framework: Carbon Neutrality and Designing for Low Carbon Infrastructure

Do you agree with the way policies CN1 - mitigating and adapting to climate change/ CN2 - energy hierarchy, will be monitored?

No, I don't agree

If no, please explain how the monitoring for these policies should be amended?:

There is no clear evidence baseline against which the Plan is being judged with Climate and Biodiversity policies related to these crises. Neither the CNP or BAP offer sufficient support in this respect. The recent WSP consultant report to inform an upgraded Carbon Neutrality Roadmap or the new tool does not go far enough in this respect to support monitoring the impact of CN policies on the LP and vice versa of the LP on the CNP?

Whole Life Carbon (Operational and Carbon) considerations are not considered. A register is needed for monitoring new build and major refurbishments' embodied energy/carbon in material and fabrics to ensure these policies meet an optimal Energy Hierarchy delivery for all energy/carbon and not just operational carbon to abate Climate Change and protect nature.

The monitoring method needs to ensure carbon emissions and Nature-based Solutions are being included in successful Planning applications.

Ideally, a Supplementary Planning Guidance (SPG) for Developers and Council staff will help to provide a clear and transparent guidance and robust monitoring indicators.

Do you agree with the way strategic policy CN3 - energy efficiency standards to reduce carbon emissions, will be monitored?

No, I don't agree

If no, please explain how the monitoring for this policy should be amended?:

A register is needed for monitoring new build and major refurbishments embodied energy in material and fabrics to ensure an optimal Energy Hierarchy delivery for all energy/carbon and not just operational carbon is being abated for Climate Change and protecting nature.

Do you agree with the way strategic policy CN4 - water standards in new developments, will be monitored?

No, I don't agree

If no, please explain how the monitoring for this policy should be amended?:

Given the environmental crises, it is insufficient just to get a water efficiency credit when the lowest credit is only a 12.5% improvement. The standard should be set to at least a BREEAM Credits 5 (55%) or above to ensure climate and biodiversity crises are mitigated to a higher standard. This will also reduce running cost for occupants.

Do you agree with the way strategic policy CN5 - renewable and low carbon energy schemes, will be monitored?

No, I don't agree

If no, please explain how the monitoring for this policy should be amended?:

A monitoring register to quantify the benefits from approved and delivered schemes is needed to ensure progress to avoided carbon/energy emissions is being made and recorded.

Do you agree with the way strategic policy CN6 - micro energy regeneration schemes, will be monitored?

No, I don't agree

If no, please explain how the monitoring for this policy should be amended?:

A monitoring process with quantified carbon/energy emissions avoided from grid (capacity of schemes) for approved and delivered applications is needed.

Do you agree with the way strategic policy Policy CN7 - Energy Storage, will be monitored?

No, I don't agree

If no, please explain how the monitoring for this policy should be amended?:

A monitoring register to quantify the benefits from approved and delivered schemes is needed to ensure progress to avoided carbon/energy emissions is being made and recorded.

Where would you like to go next?

I would like to go back to the monitoring framework contents page

Monitoring Framework: High Quality Places and Living Well

Do you agree with the way strategic policy D1 - high quality, well designed and inclusive places, will be monitored?

No, I don't agree

If no, please explain how the monitoring for this policy should be amended?:

There is no clear evidence of how Policies D1 to D5 will be assessed for net zero or lowest minimal impacts on the Climate and Biodiversity crises. This includes optimal use of Nature-based solutions plus Local Nature Recovery Strategies to ensure high quality, well designed and inclusive places.

Monitoring objectives are required for all these aspects.

Do you agree with the way the strategic policies D2 - (design principles for Winchester Town)/ D3 - (design principles for South Hampshire urban areas)/ D4 - (design principles for market towns and rural villages), will be monitored?

No, I don't agree

If no, please explain how the monitoring for these policies should be amended?:

There is no clear evidence of how Policies D1 to D5 will be assessed for net zero or lowest minimal impacts on the Climate and Biodiversity crises. This includes optimal use of Nature-based solutions plus Local Nature Recovery Strategies to ensure high quality, well designed and inclusive places.

Monitoring objectives are required for all these aspects.

Do you agree with the way policy D5 – masterplan, will be monitored?

No, I don't agree

If no, please explain how the monitoring for this policy should be amended?:

There is no clear evidence of how Policies D1 to D5 will be assessed for net zero or lowest minimal impacts on the Climate and Biodiversity crises. This includes optimal use of Nature-based solutions plus Local Nature Recovery Strategies to ensure high quality, well designed and inclusive places.

Monitoring objectives are required for all these aspects.

Do you agree with the way policy D6 - brownfield development and making best use of land, will be monitored?

No, I don't agree

If no, please explain how the monitoring for this policy should be amended?:

Creative use of best and most versatile agricultural land without hindering land production is now possible. This opportunity needs profiling/understanding set against the need for carbon net zero and biodiversity protections. Needs to include no of applications for solar farms on the best and most versatile (BMV) land.

This is important so the changes in the approach for opportunities to net zero as recorded. Specifically, to not accept blindly the current government guidance to planning authorities for a "strong presumption" against solar farms on the best and most versatile (BMV) land.

Crop and /or livestock production failing to use land and light twice for maximum net zero contributions inc. for biodiversity enhancement plus new green businesses and economy benefits is a missed opportunity for the two crises.

Land production can be enhanced with economic benefits for land users with this dual approach with twin income streams benefits for agriculture land managers.

Do you agree with the way the policy D7 - Development Standards /policy D8 - Contaminated Land, will be monitored?

Yes, I agree

If no, please explain how the monitoring for these policies should be amended?:

Do you agree with the way policy D9 - impact of overheating, will be monitored?

Yes, I agree

If no, please explain how the monitoring for this policy should be amended?:

Do you agree with the policies D10 - shop fronts / D11 - signage, will be monitored?

I neither agree nor disagree

If no, please explain how the monitoring for these policies should be amended?:

Where would you like to go next?

I would like to go back to the monitoring framework contents page

Monitoring Framework: Biodiversity and the Natural Environment

Do you agree with the way strategic policy NE1 - protecting and enhancing biodiversity and the natural environment in the district, will be monitored?

No, I don't agree

If no, please explain how the monitoring for this policy should be amended?:

I robust monitoring regime is needed as a business-as-usual monitoring approach is no longer acceptable in the face of the climate and biodiversity crises.

The regulation BNG is low bar given the twin environmental crises and additionality is needed using Nature-based solutions.

Plus, the Plan requires a local state of nature report to enable nature recovery. The Environment Act requires this report to underpin the development of the Local Nature Recovery Strategies.
Planning applications ideally should quantify the net zero impacts on these strategies and the contributions of these biodiversity (carbon sequestration) enhancements whenever possible. Monitoring progress on this is an important dimension for place making and environmental protection. This is not mentioned in this Local Plan?

This requirement can also assist any last resort offsetting proposals from developers. But without a relevant supporting Supplementary Policy Document (SPD) or set of new Policies it is unclear what the standards is for offsetting and Nature-based solutions. It is recommended WCC develop these for as part of the final edition of the Local Plan.

Do you agree with the way policies NE2 - major commercial, educational and MOD establishment in the countryside /NE6 - flooding and flood risk/ NE7 - settlement gaps/ NE9 - landscape character /NE10 - protecting open areas /NE12 - equestrian development / NE13 - leisure and recreation in the countryside / NE14 - rural character, will be monitored?

No, I don't agree

If no, please explain how the monitoring for these policies should be amended?:

Flood prevention measures can be applied/designed into the environment without recourse to engineered SUDS measure through application of Nature-based solutions. This should be encouraged, and data captured to show delivery of both approaches for virtuous circle feedback for LP and WCC policy improvements.

Policies need to seek protection of all existing mature trees and not just ancient and veteran trees for Land character and climate and biodiversity purposes. This needs a strict monitoring regime which is more than the TPO system.

Quantitative understanding and monitoring of size settlement gaps is needed.

Do you agree with the way strategic policy NE3 - open space, sport & recreation, will be monitored?

No, I don't agree

If no, please explain how the monitoring for this policy should be amended?:

These objectives are supported with the following additions:

A monitoring regime for an objective to understand why new open spaces, when in proximity to new build, do not include a design for district heating, i.e., GSHP or similar. This monitoring can be linked to the Carbon Neutrality policy and the energy hierarchy.

A much stronger requirement for community growing spaces can also to be include in all new developments. The onus should be on the developer to

demonstrate if and why this is not achievable. This needs to be monitored and recorded.

Do you agree with the way policy NE4 - green and blue infrastructure, will be monitored?

No, I don't agree

If no, please explain how the monitoring for this policy should be amended?:

It is not just the CIL/S106 process that needs monitoring.

GI and G/B infrastructure can be complemented by the Environment Act requirement to develop Local Nature Recovery Strategies. A baseline and monitoring of delivery/enhancement in this respect is needed.

Do you agree with the way policy NE5 – biodiversity, will be monitored?

No, I don't agree

If no, please explain how the monitoring for this policy should be amended?:

Nature recovery is as crucial to our wellbeing as the elimination of carbon emissions and adaptation to changed climate. Therefore, best practise Nature-based solutions must be applied in the built and natural environment in any new development which goes further than the low bar BNG.

The BNG policy in the Local Plan will need to avoid biodiversity loss in the first place, to completely avoid impacts on irreplaceable habitats and protected and unprotected wildlife sites such as ancient woodlands, to properly value biodiversity including in neglected areas such as scrub, to avoid downgrading mature habitats by replacing them with new species-poor habitats.

Sites for BNG offsetting should have the potential to buffer or expand existing habitats. For example, connecting woodland blocks, buffering ancient woodland and species rich grassland creation.

A monitoring regime is required for this.

Do you agree with the way policy NE8 - South Downs National Park, will be monitored?

No, I don't agree

If no, please explain how the monitoring for this policy should be amended?:

As stated earlier. There is a need to monitor the number of applications for changes in land practises to further creative use of best and most versatile agricultural and other land which does not hinder land production or impact on climate and biodiversity issues. The aim should be to support changes to regulations whether NPA or otherwise. For example, if an opportunity to use the most versatile agricultural land is made with benefits to carbon net zero and biodiversity then this should be allowed. WCC need to capture this data and to aid arguments to changes in planning restrictions.

Continuing blind acceptance of current legislation without a challenge to the guidance in planning for a "strong presumption" against solar farms on the best and most versatile (BMV) land is unacceptable and unethical in the face of the environment, energy and food crises.

Crop and /or livestock production failing to use land and light twice for maximum net zero contributions inc. for biodiversity enhancement plus new green businesses and economy benefits is a missed opportunity for the two crises. Land production can be enhanced for economic benefits for land land users and nature protection. This dual approach with twin income streams benefits agriculture land managers and communities.

Solar farms have the potential to introduce a greater net gain in biodiversity for agricultural land. For example, Agrivoltaic schemes combine land production with solar energy generation which avoids the use of other greenfield sites for solar use which then allows more opportunities for nature/rewilding/nature recovery improvements.

Do you agree with the way policy NE11 - open space provision for new developments, will be monitored?

No, I don't agree

If no, please explain how the monitoring for this policy should be amended?:

Needs smarter monitoring targets as suggested at NE3.

Do you agree with the way policy NE12 - Equestrian Development, will be monitored?

I neither agree nor disagree

If no, please explain how the monitoring for this policy should be amended?:

Do you agree with the way policy NE15 - special trees, important hedgerows and ancient woodlands, will be monitored?

No, I don't agree

If no, please explain how the monitoring for this policy should be amended?:

In view of the Climate and Biodiversity crises, mature trees need to be included in this monitoring. A new Policy beyond TPOs will be needed for this .

Do you agree with the way policy NE16 - nutrient neutrality, water quality effect on the special protection areas (SPA's), special areas of conservation (SAC's) and ramsar sites of The Solent and The River Itchen, will be monitored?

Not Answered

If no, please explain how the monitoring for this policy should be amended?:

A clear governance/regulating/monitoring mechanism is needed to ensure the allocating of land for nutrient neutrality mitigation/offsetting is robust and not open to abuse.

How will land /activity set aside for nutrient neutrality be checked/monitored?

Do you agree with the way strategic policy NE17 - rivers, watercourses and their settings, will be monitored?

No, I don't agree

If no, please explain how the monitoring for this policy should be amended?:

Where would you like to go next?

I would like to go back to the monitoring framework contents page

Monitoring Framework: Creating a Vibrant Economy

Do you agree with the way strategic policies E1 - general vibrant economy strategy /E2 - spatial distribution of economic growth /E3 - town centres strategy and Hierarchy and policies E5 - enhancing employment opportunities / E6 - retaining employment opportunities / E7 - maintaining the vitality and viability of the town centres /E8 - local shops, services and facilities /E9 - economic development in the rural area /E10 - farm diversification /E11 - visitor related development within the countryside, will be monitored?

No, I don't agree

If no, please explain how the monitoring for these policies should be amended?:

As comments in the relevant policy E10
Radical changes can include new developments or changes in land use for a green economy and mitigating the climate and biodiversity crisis.

Multi-benefit approaches with application of Agrivoltaic projects using Renewable Energy from solar and farming is an example. In other words, locating solar generating modules on the same surface as agricultural production. See new standards defined in France for agrivoltaics - pv magazine International (pv-magazine.com) indicate best definitions for Agrivoltaics.

Agrivoltaics allow land practises - crops and livestock production to use land and light twice for new green businesses and economy benefits whilst protecting the environment and improving food yields.

Specifically, this approach will need justification against the "strong presumption" against solar farms on the best and most versatile (BMV) land - land that is classified in law as Grade 1, Grade 2, or Grade 3a. This will overcome current focus only Grade 3b land confirmed suitable for solar farm development - Farmers Weekly (fwi.co.uk).
Importantly, Agrivoltaics solar farms do not displace farming they can enhance the land use, productivity, decarbonisation, and biodiversity with new green business opportunities.

General comments below need to be inculcated into E10. (See CNP Roadmap report from WSP).

An agriculture and the land management strategy should be considered alongside one another. For example, open habitats (such as heathlands and semi-natural grasslands), additional conservation headlands and arable field margins, and strip farming should be integrated into agricultural landscapes, or enhanced where already present.

These habitats can sequester greater amounts of carbon than agriculture alone (which is considered a net-emitter of carbon dioxide), reduce nutrient depletion and enhance soil health, which will indirectly sequester additional carbon.

A monitoring regime is required for the above.

Where would you like to go next?

I would like to go back to the monitoring framework contents page

Carbon Neutrality and Designing for Low Carbon Infrastructure

There are seven policies linked to carbon neutrality and designing for low carbon infrastructure. Please click on the policy that you wish to comment on:

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Biodiversity and the Natural Environment

There are 17 policies linked to biodiversity and the natural environment. Please click on the policy that you wish to comment on:

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NE1- Protecting and Enhancing Biodiversity and the Natural Environment in the District

NE1 Do you support the approach in policy NE1- protecting and enhancing biodiversity and the natural environment in the district?

No, I object to the policy

If no, please explain how this policy should be amended?:

Fully support iii and v.

vi. End of para - ADD

Plus assists the mitigation of carbon emissions and adaptation to climate change.

Where would you like to go next?

I would like to go back to the biodiversity and the natural environment contents page

NE2 - Major Commercial, Educational and MOD Establishments in the Countryside

NE2 Do you support the approach in policy NE2 - Major Commercial, Educational and MOD Establishments in the Countryside?

I neither support or object to the policy

If no, please explain how this policy should be amended?:

Where would you like to go next?

I would like to go back to the biodiversity and the natural environment contents page

NE3 - Open Space, Sport and Recreation

NE3 Do you support the approach in policy NE3 - Open Space, Sport and Recreation

I neither support or object to the policy

If no, please explain how this policy should be amended?:

Add new para.
iv. Open spaces can also provide opportunities for local district heating beneath playing pitches. This can be of direct benefit to any sporting built space or to a local community. link to Policies under CN.

Where would you like to go next?

I would like to go back to the biodiversity and the natural environment contents page

NE4 - Green and Blue Infrastructure

NE4 Do you support the approach in policy NE4 - green and blue infrastructure?

Yes, I support the policy

If no, please explain how this policy should be amended?:

Where would you like to go next?

I would like to go back to the biodiversity and the natural environment contents page

NE5 – Biodiversity

NE5 Do you support the approach in policy NE5 – biodiversity?

No, I object to the policy

If no, please explain how this policy should be amended?:

Will fully support when the Policy fully reflects the following:

- Requirement under the Environment Act to develop and deliver Local Nature Recovery Strategies
- Related to the above point, is the urgent need for a comprehensive State of Nature report
- the interdependence of biodiversity with the climate crises and vice versa
- the application of Nature-based Solutions for enhanced delivery of BNG, mitigation and adaptation to the biodiversity with the climate crises.

Query on point iii:
Who monitors the requirement for "biodiversity to be maintained for a period of 30 years" and what sanctions apply if a developer fails to comply with this requirement?

Add ix. (Page 156)

Nature recovery is as crucial to our wellbeing as the elimination of carbon emissions and adaptation to changed climate. Therefore, best practise Nature-based solutions must be applied in the built and natural environment.

The BNG policy in the Local Plan will need to avoid biodiversity loss in the first place, to completely avoid impacts on irreplaceable habitats and protected and unprotected wildlife sites such as ancient woodlands, to properly value biodiversity including in neglected areas such as scrub, to avoid downgrading mature habitats by replacing them with new species-poor habitats.

Sites for BNG offsetting should have the potential to buffer or expand existing habitats. For example, connecting woodland blocks, buffering ancient woodland and species rich grassland creation.

Where would you like to go next?

Not Answered

NE6 - Flooding, Flood Risk and the Water Environment

NE6 Do you support the approach in policy NE6 - flooding, flood risk and the water environment?

No, I object to the policy

If no, please explain how this policy should be amended?:

Flood prevention measures can be applied/designed into the environment without recourse to engineered SUDS measure. Other approaches are available including Nature-based solutions.

Nature-based solutions need to be at highr profile in this Policy.

Add new point vii:
'For major developments, evaluate the potential for the development to affect sewage outflow into watercourses, so that cumulative impact of wastewater can be assessed.'

Add new point at end of 7.47

Adopt best Nature-based solutions for the climate and biodiversity crisis.

There is too much narrative in 7.54 to 7.60. the Plan needs to simply state the problem, how it will be managed and monitored with reference to a separate SPD with all the details.

Amend 7.60

This para and the rest of the Nitrogen/Phosphorous problem needs to be qualified with more detail in an SPD. SPD needs to include clear standards, regulation, methods of management and monitoring to ensure any land set aside for mitigation is done correctly to avoid reestablishment of harmful nutrient pollution pathways that can harm water bodies an biodiversity.

The nutrient problem with application of Nature-based solutions offers an option to increase the land's capacity to remove carbon from the atmosphere and at the same to help significantly address this problem without creating more carbon emissions.

Where would you like to go next?

I would like to go back to the biodiversity and the natural environment contents page

NE7 - Settlement Gaps

NE7 Do you support the approach in policy NE7 - settlement gaps?

I neither support or object to the policy

If no, please explain how this policy should be amended?:

Where would you like to go next?

I would like to go back to the biodiversity and the natural environment contents page

NE8 - South Downs National Park

NE8 Do you support the approach in policy NE8 - South Downs National Park?

I neither support or object to the policy

If no, please explain how this policy should be amended?:

Where would you like to go next?

I would like to go back to the biodiversity and the natural environment contents page

NE9 - Landscape Character

NE9 Do you support the approach in policy NE9 - landscape character?

No, I object to the policy

If no, please explain how these policies should be amended?:

Amend iii

Insert after green infrastructure....., ecosystem services.

For definition of ecosystem services and benefits see examples in SDNP Plan.

A more flexible approach is required to Land scape Character.

Consideration should be given in light of the Climate and Biodiversity crises to allow, on merit, changes in land practises to further creative use of best and most versatile agricultural and other land which does not hinder land production or impact on climate and biodiversity issues.
The aim should be to support changes to regulations whether NPA or otherwise. For example, if an opportunity to use the most versatile agricultural land is made with benefits to carbon net zero and biodiversity then this should be allowed. WCC need to capture this data and to aid arguments to changes in planning restrictions.

Continuing blind acceptance of current legislation without a challenge to the guidance in planning for a "strong presumption" against solar farms on the best and most versatile (BMV) land is unacceptable and unethical in the face of the environment, energy and food crises.

Crop and /or livestock production failing to use land and light twice for maximum net zero contributions inc. for biodiversity enhancement plus new green businesses and economy benefits is a missed opportunity for the two crises. Land production can be enhanced for economic benefits for land land users and nature protection. This dual approach with twin income streams benefits agriculture land managers and communities.

Solar farms have the potential to introduce a greater net gain in biodiversity for agricultural land. For example, Agrivoltaic schemes combine land production with solar energy generation which avoids the use of other greenfield sites for solar use which then allows more opportunities for nature/rewilding/nature recovery improvements.

Where would you like to go next?

I would like to go back to the biodiversity and the natural environment contents page

NE10 - Protecting Open Areas

NE10 Do you support the approach in policy NE10 - protecting open areas?

No, I object to the policy

If no, please explain how this policy should be amended?:

See NE9 for a need for a relaxation of use of Open Spaces, where they demonstrate opportunities for dual use of land.

Where would you like to go next?

I would like to go back to the biodiversity and the natural environment contents page

NE11 - Open Space Provision for New Developments

NE11 Do you support the approach in policy NE11 - open space provision for new developments?

I neither support or object to the policy

If no, please explain how this policy should be amended?:

Where would you like to go next?

I would like to go back to the biodiversity and the natural environment contents page

NE12 - Equestrian Development

NE12 Do you support the approach in policy NE12 - equestrian development?

I neither support or object to the policy

If no, please explain how these policies should be amended?:

Where would you like to go next?

I would like to go back to the biodiversity and the natural environment contents page

NE13 - Leisure and Recreation in the Countryside

NE13 Do you support the approach in policy NE13 - leisure and recreation in the countryside?

I neither support or object to the policy

If no, please explain how this policy should be amended?:

Where would you like to go next?

I would like to go back to the biodiversity and the natural environment contents page

NE14 - Rural Character

NE14 Do you support the approach in policy NE14 - rural character?

No, I object to the policy

If no, please explain how this policy should be amended?:

The climate and biodiversity crises require latitude in lnd planning and hard and fast rural character regulations.

Changes to land character should be permitted to further creative use of best and most versatile agricultural and other land which does not hinder land production or impact on climate and biodiversity issues. The aim should be to support changes to regulations whether NPA or otherwise. For example, if an opportunity to use the most versatile agricultural land is made with benefits to both carbon net zero and biodiversity then this should be allowed.

Continuing blind acceptance of current legislation without a challenge to the guidance in planning for a "strong presumption" against solar farms on the best and most versatile (BMV) land is unacceptable and unethical in the face of the environment, energy and food crises.

Crop and /or livestock production failing to use land and light twice for maximum net zero contributions inc. for biodiversity enhancement plus new green businesses and economy benefits is a missed opportunity for the two crises. Land production can be enhanced for economic benefits for land land users and nature protection. This dual approach with twin income streams benefits agriculture land managers and communities.

Solar farms have the potential to introduce a greater net gain in biodiversity for agricultural land. For example, Agrivoltaic schemes combine land production with solar energy generation which avoids the use of other greenfield sites for solar use which then allows more opportunities for nature/rewilding/nature recovery improvements.

Where would you like to go next?

I would like to go back to the biodiversity and the natural environment contents page

NE15 - Special Trees, Important Hedgerows and Ancient Woodlands

NE15 Do you support the approach in policy NE15 - special trees, important hedgerows and ancient woodlands?

No, I object to the policy

If no, please explain how this policy should be amended?:

Given the biodiversity and climate crises all mature trees should come under the provision of NE15.

All new plantings should be appropriate to contribute to mitigating, protecting and adapting our environment and communities to the climate and biodiversity crises.

Where would you like to go next?

I would like to go back to the biodiversity and the natural environment contents page

NE16 - Nutrient Neutrality Water Quality Effects on the Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar Sites of the Solent and the River Itchen

NE16 Do you support the approach in policy NE16 - nutrient neutrality water quality effects on the special protection areas (SPAs), special areas of conservation (SACs) and ramsar sites of the Solent and the River Itchen?

No, I object to the policy

If no, please explain how this policy should be amended?:

7.115 Amend. Last sentence to read: 'The inclusion of a policy has been supported by Natural England and is the approach to be followed.

If the word 'preferred' is used it suggests there might be alternatives? What are they?

This Policy needs more clarity on the governance/regulating/monitoring mechanisms to ensure the allocating of land for nutrient mitigation is robust and not open to abuse. Importantly and ideally all developments should not have a pathway to pollute the environment in the face of the twin climate and nutrient crises.

If a development is nutrient neutral at inception, how is it maintained to be nutrient neutral?

Where would you like to go next?

I would like to go back to the biodiversity and the natural environment contents page

NE17 - Rivers, Watercourses and their Settings

NE17 Do you support the approach in policy NE17 - rivers, watercourses and their settings?

No, I object to the policy

If no, please explain how these policies should be amended?:

7.116 Amend to include:
'and Climate Change'.

7.119 Add new sentence:
Importantly, any new water side development should include canopy shading flora to assist with biodiversity and drought protection from increasing extreme climate change weather conditions.

Where would you like to go next?

I would like to go back to the biodiversity and the natural environment contents page

Creating a vibrant economy

There are 11 policies linked to carbon neutrality and designing for low carbon infrastructure. Please click on the policy that you wish to comment on:

Back to the main contents page

E10 - Farm Diversification

E10 Do you support the approach in policy E10 - farm diversification?

No, I object to the policy

If no, please explain how this policy should be amended?:

This policy does not go far enough to signpost the opportunities to promote a more diverse rural economy and improve the sustainability of farming for the benefits of all.

Amend 10.159 to read as follows showing inclusion of 'protection and enhancement of biodiversity':

...to promote a more diverse rural economy and to move towards a more low carbon green economy, with protection and enhancement of biodiversity.

Amend 10.158 or add following as new paras or sub paras:
Radical changes can include new developments or changes in land use for a green economy and mitigating the climate and biodiversity crisis. Multi-benefit approaches with application of Agrivoltaic projects using Renewable Energy from solar and farming is an example. In other words, locating solar generating modules on the same surface as agricultural production thereby using land and light twice and avoiding solar farm on greenfield sites which can be used to nehance nature for benefits of food production, communities and people.
See new standards defined in France for agrivoltaics - pv magazine International (pv-magazine.com) indicate best definitions for Agrivoltaics.

Agrivoltaics allow land practises - crops and livestock for new green businesses and economy benefits whilst protecting the environment and improving food yields.

Specifically, this approach will need justification against the "strong presumption" against solar farms on the best and most versatile (BMV) land - land that is classified in law as Grade 1, Grade 2, or Grade 3a. This will overcome current focus only Grade 3b land confirmed suitable for solar farm development - Farmers Weekly (fwi.co.uk). Importantly, Agrivoltaics solar farms do not displace farming they can enhance the land use, productivity, decarbonisation, and biodiversity with new green business opportunities.

General comments below need to be inculcated into E10. (See CNP Roadmap report from WSP).

An agriculture and the land management strategy should be considered alongside one another. For example, open habitats (such as heathlands and semi-natural grasslands), additional conservation headlands and arable field margins, and strip farming should be integrated into agricultural landscapes, or enhanced where already present.

These habitats can sequester greater amounts of carbon than agriculture alone (which is considered a net-emitter of carbon dioxide), reduce nutrient depletion and enhance soil health, which will indirectly sequester additional carbon.

Where would you like to go next?

I would like to go back to the creating a vibrant economy contents page

Evidence Base

Please use the dropdown menu to select the evidence base that you would like to comment on:

Please use the dropdown menu to select the evidence base that you would like to comment on (1)::

If you would like to make a comment about the evidence base, please do so in the space provided below. Please include the page number and paragraph that you are referring to::

Providing a list of the evidence base documents is helpful but looking at the Council's website not all the documents are listed or referenced.

For example, it would useful to include the following:
Carbon Neutrality Plan (CNP)
Biodiversity Action Plan (BAP),
Enabling a Natural Capital Approach,
NCAtlas_17_HampshireandIoW_2ndEd.pdf &
What Nature can do for you and reference to Nature based Solutions (NbS).

It would be useful for the evidence base to link to a new policy emphasizing the importance of Nature based Solutions (NbS) which are a vital ingredient beyond Biodiversity Net Gain, BAPs and Green Infrastructure aspects to address the dual Climate and Biodiversity Crises and best place making. Now recognised internationally, NbS can be promoted in the Local Plan with details in a Supplementary Planning Document or similar. Importantly, NbS offers a vital approach to address multiple sustainability crises.

Refs:
- Enabling a Natural Capital Approach - data.gov.uk
- What nature can do for you - GOV.UK (www.gov.uk)

- IGNITION - Greater Manchester Combined Authority (greatermanchester-ca.gov.uk)
- House of Lords - Nature-based solutions: rhetoric or reality? - The potential contribution of nature-based solutions to net zero in the UK - Science and Technology Committee (parliament.uk)
- The four guidelines for Nature-based Solutions I Nature-based Solutions to Climate Change I Key messages for decision makers in 2020 and beyond (nbsguidelines.info)
- . Nature-based-solutions-to-the-climate-emergency.pdf (ukgbc.s3.eu-west-2.amazonaws.com)

Please use the dropdown menu to select the evidence base that you would like to comment on:

Please use the dropdown menu to select the evidence base that you would like to comment on (1)::

If you would like to make a comment about the evidence base, please do so in the space provided below. Please include the page number and paragraph that you are referring to::

Please use the dropdown menu to select the evidence base that you would like to comment on:

Please use the dropdown menu to select the evidence base that you would like to comment on (1)::

If you would like to make a comment about the evidence base, please do so in the space provided below. Please include the page number and paragraph that you are referring to::

Where would you like to go next?

I would like to go back to the main contents page

Missing Policy

Which section is the policy missing from?

Which section is the policy missing from?:
Other

Please explain what policy is missing::

The Local Plan covers the period up to 2039 which underscores the need for the new Policies, Supplementary Planning Documents (SPDs) and/or Technical Advice Notes (TANS) outlined below to be included for an optimal future proofed 'plan-making' to protect the environment, people, and communities.

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 and take the next Local Plan to the next best level to contribute to best place making and protection of the environment.

1.) Protection of Mature Trees

2.) Land for offsetting
- Link to Nature based Solutions SPD.

3.) Climate Change and Sustainable Construction Supplementary Planning Document (SPD).
- Suggest creating something similar to: download (easthants.gov.uk)

4.) Nature-based Solution
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.

5.) Whole-Life Carbon

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 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

Which section is the policy missing from?

Which section is the policy missing from?:

Please explain what policy is missing::

Which section is the policy missing from?

Which section is the policy missing from?:

Please explain what policy is missing::

Where would you like to go next?

I would like to go to the end of the survey and SUBMIT my response

About this Consultation

Has this consultation enabled you to give your opinions and ideas on this matter?

Yes

How easy or difficult was it for you to complete this consultation?

Neither easy or difficult