Response ID ANON-KSAR-NKDG-N

Submitted to Winchester District Local Plan 2019-2039: Regulation 18 Consultation
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Privacy and publication

1 Please confirm that you have read and understood the above, and you consent to your submission being published:

Yes, I confirm I understand that my response will be published with my name and associated representation.

About you

2 What is your full name or client's name if acting as an agent?

Name of respondent (or client): :
S Turner

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

Organisation/Agent::
Winchester Action on the Climate Crisis - General response

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.:
01962 827083

House number/name::
Main Campus

Street address 1::
University of Winchester

Street address 2::

Town/area::
Winchester

Postcode::
SO22 4NR

Contents

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

FINISH & SUBMIT

Introduction and Vision

There are three objectives linked to the strategy policy. Please click on the policy that you wish to comment on:

Back to the main contents page

SP1 - Vision and Objectives

SP1 Do you support the approach in policy SP1 – Vision and objectives?

I neither support or object to the policy

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

Following para 3.7
Objectives for tackling climate change -
objective vii, which refers to maximising the use of low carbon infrastructure and construction etc, should be clarified to ensure that it includes renewable energy generation.
Vibrant local economy -
Objective viii should be clarified to ensure that it includes renewable energy generation

Where would you like to go next?

I would like to go back to the introduction and vision contents page

SP2 Spatial Strategy and Development Principles

Do you support the approach in strategic policy SP2spatial strategy and development principles?

I neither support or object to the policy

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

Point vi of the Policy should require non car means of travel to be prioritised.

Where would you like to go next?

I would like to go back to the introduction and vision contents page

SP3 Development in the Countryside

Do you support the approach in strategic policy SP3 - development in the countryside?

No, I object to the policy

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

Policy SP3 should be amended to include "development for renewable energy generation" as a type of development that will be permitted in the countryside

Where would you like to go next?

I would like to go back to the introduction and vision contents page

Monitoring Framework

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

Strategic Policy

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:

CN 7 – Energy Storage

CN 1 - Mitigating and Adapting to Climate Change

CN 1 Do you support the approach in policy CN 1 - mitigating and adapting to climate change?

I neither support or object to the policy

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

Key issues following para 4.8

This should be made clearer by stating that the Council WILL support proposals for low carbon energy infrastructure.

POLICY CN1

The requirement for an energy statement should be listed as requirement x.

Where would you like to go next?

I would like to go back to the carbon neutrality and designing for low carbon infrastructure contents page

CN2 - Energy Hierarchy

CN 2 Do you support the approach in policy CN2 - energy hierarchy?

I neither support or object to the policy

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

Policy CN2

Should include a requirement that the way in which the energy hierarchy has informed and developed the design should be set out in the Energy and Carbon Statement, required within preceding policy (CN2)

Where would you like to go next?

I would like to go back to the carbon neutrality and designing for low carbon infrastructure contents page

CN3 - Energy Efficiency Standards to Reduce Carbon Emissions

CN 3 Do you support the approach to policy CN3 - energy efficiency standards to reduce carbon emissions?

I neither support or object to the policy

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

Paragraph 4.20 should clarify which version of the Building Regulations is being referred to. We assume 2022 version.
Policy CN3
Explanatory paragraph 2, lines 2/3, should be amended to read: "all new developments SHOULD (omit "seek to") DEMONSTRATE the lowest level....etc

Policy CN3
We strongly endorse points i to iv which set challenging requirements for all new dwellings (omit residential - all dwellings are residential)

Policy CN3
Point v - Non residential development. This is inadequate because BREEAM is not a tool for for driving zero carbon development. The following should therefore be added to Point v - "Demand for space heating should be met by renewables"

Policy CN3 - Measurement and verification
It should be stated that the metering, monitoring and reporting strategy will be assessed when determining whether to grant planning permission and it should explain how this will be carried out. A requirement for pre occupation validation should be added.

Policy CN3 point v - Non residential development.

Where would you like to go next?

I would like to go back to the carbon neutrality and designing for low carbon infrastructure contents page

CN4 – Water Efficiency Standards in New Developments

CN 4 Do you support the approach in policy CN4 – water efficiency standards in new developments?

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 carbon neutrality and designing for low carbon infrastructure contents page

CN5 – Renewable and Low Carbon Energy Schemes

CN 5 Do you support the approach in policy CN5 – renewable and low carbon energy schemes?

I neither support or object to the policy

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

Paragraph 4.38.
We endorse the Plan's support for retrofitting existing buildings. We would like this section to go further and state a preference for sensitive retrofitting above demolition and rebuilding. At the very least we would like to see a reference to future guidance on this topic similar to that produced by the Mayor of London:

https://www.dezeen.com/2022/04/21/london-plan-guidance-retention-sadiq-khan/

Paragraph 4.39.
Please change 17% to 100%. This is the "target potential" identified in the Study. And please delete the two sentences about energy potential in the South Downs National Park. There is no content resembling these sentences in the Study.

Paragraph 4.40
Please add a further bullet point: "It would additionally require the potential for wind energy that exists within the District to be activated, as outlined in the Study."

Paragraph 4.44
Please delete or move to one of the Residential sections. District Energy Systems are not normally structured as community energy and usually necessitate a non-renewable energy source.

Policy CN5
Whilst this represents a permissive policy, it is less permissive than the corresponding Policy in the existing Local Plan, both in wording and in the expanded list of constraints.
The Policy should take a much more positive tone to encourage such schemes.

(viii) If it is necessary to include a lighting condition, we request that it should be no more restrictive that the policies for equestrian, leisure and rural developments.

x) we request that this condition be omitted as the question of fire safety for batteries will be covered by relevant industry fire regulations.

(xi) we suggest that recycling standards for construction materials should be considered throughout the Plan rather than applied to renewable energy developments in isolation. For information, solar panels are classified as electronic equipment for purposes of the Waste Electrical and Electronic Equipment (WEEE) regulations imposed by the Environment Agency.

Add xii to restore the reference in the existing Local Plan to : "contribution to national, regional & sub-regional renewable energy targets."

Where would you like to go next?

I would like to go back to the carbon neutrality and designing for low carbon infrastructure contents page

CN6 – Micro Energy Generation Schemes

CN 6 Do you support the approach to policy CN6 – micro energy generation schemes?

Yes, I support the policy

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

Policy CN6

ii The noise impacts should be more clearly defined with regard to noise levels, distances and recipients.

Where would you like to go next?

I would like to go back to the carbon neutrality and designing for low carbon infrastructure contents page

CN7 – Energy Storage

CN 7 Do you support the approach in policy CN7 – energy storage?

No, I object to the policy

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

Policy CN7
(i) this point is too restrictive. Co-location of generation and storage is desirable but not always possible because grid constraints exist in both directions (supply and distribution)
Point (i) should be amended to allow flexibility

(iii) This is too restrictive and should be deleted. All large batteries require cooling fans. Noise concerns can be addressed through point (ii).

Where would you like to go next?

Not Answered

High Quality Place and Living Well

There are 11 policies linked to High quality, well-designed places and living well. Please click on the policy that you wish to comment on:

D9 – Impact of overheating

D1 - High Quality, Well Designed and Inclusive Places

D1 Do you support the approach in policy D1 – High quality, well designed and inclusive places?

I neither support or object to the policy

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

Policy D1 should include a requirement for SUDS.

Policy D1 - point (xi) should be added to include a requirement for proposals to demonstrate that the role of embodied carbon has been considered as part of the design process.

Where would you like to go next?

I would like to go back to the high quality, well-designed places and living well contents page

D2 - Design Principles for Winchester Town

D2 Do you support the approach in policy D2 – design principles for Winchester Town?

Yes, I support the policy

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

We strongly support points (vi) and (vii) of this policy.

Where would you like to go next?

I would like to go back to the high quality, well-designed places and living well contents page

D5- Masterplan

D5 Do you support the approach in policy D5- masterplan?

I neither support or object to the policy

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

Policy D5
we generally support this policy but the order of points (i) to (xv) is misleading.

Existing point (vi), reducing the need for car use, should be point (i) of the policy
Point (xiv), assessing potential for including renewable energy schemes, should be prioritised at a very early stage of masterplanning.

Where would you like to go next?

Not Answered

D9 – Impact of Overheating

D9 Do you support the approach in policy D9 – impact of overheating?

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 main contents page

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:

NE11 - Open Space Provision for New Developments

NE3 - Open Space, Sport and Recreation

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

No, I object to the policy

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

Policy NE3 should include a much stronger requirement for community growing spaces to be included in all new development. The onus should be on the developer to demonstrate if and why this is not achievable.

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?

No, I object to the policy

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

Policy NE11 should include a specific requirement for allotments/ community growing spaces to be provided in all residential developments of 5 dwellings or above.

Where would you like to go next?

I would like to go back to the main contents page

The Historic Environment

There are 14 policies linked to the historic environment. Please click on the policy that you wish to comment on:

HE9 - Change of use to listed buildings

HE9 - Change of use to Listed Buildings

HE9 Do you support the approach in policy HE9 - change of use to listed buildings?

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 main contents page

HE14 - Improvements or Alterations to Improve the Energy Efficiency of Designated and Non-Designated Historic Assets

HE14 Do you support the approach in policy HE14 - improvements or alterations to improve the energy efficiency of designated and non-designated historic assets?

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?

Not Answered

Missing Policy

Which section is the policy missing from?

Which section is the policy missing from?:
Carbon neutrality and low carbon infrastructure

Please explain what policy is missing::

A Policy to designate Local Green Spaces should be added. The Council should undertake consultation to allow communities to put forward proposals for land to be designated as Local Green Spaces and these proposals should be assessed on the basis of the criteria a - c as set out in paragraph 102 of the NPPF - set out below:

The NPPF states:

The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.
102. The Local Green Space designation should only be used where the green space is:

a) in reasonably close proximity to the community it serves;

b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and

c) local in character and is not an extensive tract of land.

This policy is necessary because it will provide a higher level of protection than that proposed for open areas as set out in Policy NE10.

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 back to the main contents page

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