Response ID ANON-KSAR-NKKV-B

Submitted to Winchester District Local Plan 2019-2039: Regulation 18 Consultation
Submitted on 2022-12-14 19:00:06

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): :
Robin Speed

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 - Science and Technology Advisory Panel

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 the Climate Crisis

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:

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:

SP2 - Spatial strategy and development principles

SP1 - Vision and Objectives

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

Not Answered

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

Where would you like to go next?

Not Answered

SP2 Spatial Strategy and Development Principles

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

Not Answered

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

Where would you like to go next?

Not Answered

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

CN2 - Energy Hierarchy

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

No, I object to the policy

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

Exempting extensions and conversions could create a loophole for all kinds of development to bypass energy efficiency standards. For example, 'conversions' may retain very little of the original fabric. This should be addressed in the plan. In particular conversion or extension of rental property must conform to the same standards as new build to avoid adversely affecting tenants.
It is recommended that LETI standards for retrofitting should be the presumption for all conversions and extensions.

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?

No, I object to the policy

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

In relation to point iv. It would be better to defer to the LETI standards here as there are nuances related to the generation.
Typo: 4.29 'energy hierarchy (Policy CN3)' should surely read 'energy hierarchy (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

CN4 – Water Efficiency Standards in New Developments

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

No, I object to the policy

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

Water is a strategic resource which is likely to get scarcer in Winchester District as the climate warms. Therefore developments must be reviewed to ensure they do not place any additional strain on water resources. Private water extraction should be regulated and a presumption of prohibition should be the norm.

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?

No, I object to the policy

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

Renewable energy in the form of solar panels, wind turbines or heat pumps should not have restrictions imposed any more than other forms of land use subject to national laws. There should be a presumption of approval of these schemes. For more information on renewable energy potential in Winchester District see https://www.winacc.org.uk/wp-content/uploads/2022/02/winacc-energy-report-2022-final.pdf

Responses to some of the numbered paragraphs:
i. loss of agricultural land is a spurious issue given the land area occupied by renewable energy schemes. Livestock farming in contrast has significant emissions.

ii. The visual appearance of renewable energy schemes is subjective and the installations are easily removed should the energy outlook improve.

iii. The impact on the built environment and biodiversity of renewable energy installations are small. This criterion should be presumed to be satisfied unless exceptional circumstances can be demonstrated. In particular the impact is tiny compared with the impact of housing, livestock farming, or intensive farming.

v. Benefit to host communities should generally be presumed to apply although preference should be given to local investors.

vi. Any management plan requirement should be no more than for any other land use requirement.

vii. It is not clear how proximity to biomass plants, fuel sources and transport links is relevant to wind or solar renewable energy installations.

viii. Again it is not clear why these installations should incur more restrictions than any other installation.

ix. Again - surely this an issue for any installation - it is not clear why there should be additional restrictions for renewable energy installations.

xi. There should be no presumtion of reversion to the previous use any more than there is for any other installation.

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?

No, I object to the policy

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

Responses to numbered paragraphs:
i. In a climate emergency this clause should only apply to irreversible impact.
ii. The noise impact should be assessed as for any other noise impact from an installation.
iii. The impact on the appearance in the surrounding landscape is subjective and should be generally be presumed to be acceptable although reasonable accommodations should be accepted.

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?:

Responses to numbered paragraphs
i. This should not rule out energy storage schemes designed to work with the national grid to smooth supply.
ii. These considerations should be applied any more onerously than for other proposed infrastructure developments.
iii. Again - these conditions should be applied any more onerously than for other infrastructure such as electricity substations for example.

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:

NE9 - Landscape Character

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?:

The policy should have explicit aims for water quality in waterways.
Water is a strategic resource which is likely to get scarcer in Winchester District as the climate warms. Therefore developments must be reviewed to ensure they do not place any additional strain on water resources. Private water extraction should be regulated and a presumption of prohibition should be the norm.

Where would you like to go next?

I would like to go back to the main 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?:

Renewable energy developments should be recognised as supported and even appreciated by many and not be assumed to be out of keeping with the environment. Since solar and wind installations are essentially reversible simply not liking the way they look should not be regarded as a reason to refuse permission although reasonable accommodations should be accepted.

Where would you like to go next?

I would like to go back to the main contents page

I would like to submit a site that is not a part of the current plan

What is the address of the site you are submitting?

What is the address of the site you are submitting?:

Postcode of the site you are submitting:

Postcode::

What are the site co-ordinates? (OS grid references)

Eastings:

Northings:

What is the total area of the site? (Please provide this in hectares)

What is the total area of the site? (Please provide this in hectares):

Is the site comprised of greenfield or brownfield land?

Not Answered

Are you the landowner?

Not Answered

If no, has the landowner given permission for this site to be submitted?

Not Answered

If the site is under multiple ownerships, is there agreement by all parties that the land could be promoted for development?

Not Answered

If you selected 'no' above then please set out why you consider that the site could still be available for development.:

Is the site available for development now?

Not Answered

To the best of your knowledge, please indicate any known constraints that may restrict or prevent development on the site. Please select all that apply.

Please provide further details or any additional constraints in the box below:

Please upload an up-to-date Ordance Survey based map outlining the precise boundaries of the site in its entirety and the part which may be suitable for development (if this is less than the whole). Without this mapped information we are unable to consider the site.

Please upload an up-to-date Ordance Survey based map outlining the precise boundaries of the site in its entirety and the part which may be suitable for development (if this is less than the whole). Without this mapped information we are unable to consider the site.:
No file uploaded

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::

Two policies:
1. The council must encourage retrofitting to LETI standards and retrofit training and set up a vehicle for local investors to invest in retrofitting enterprises.

2. Livestock farming currently contributes around 15% of greenhouse gas emissions in the Winchester District. All applications for the use of land to raise livestock must be considered in this context.

Which section is the policy missing from?

Which section is the policy missing from?:
Biodiversity and the natural environment

Please explain what policy is missing::

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.

Which section is the policy missing from?

Which section is the policy missing from?:
Biodiversity and the natural environment

Please explain what policy is missing::

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.

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?

Difficult