

Chapter 12 – High Quality Environment

1.0 Introduction

- 1.1 Winchester District is fortunate to benefit from both an attractive natural environment which contributes to the setting of its many towns and villages, together with many historical and valued built assets which are fundamental to the attractiveness of its settlements. These elements and the relationship between them make the District a special place.
- 1.2 This section of the Core Strategy covers a number of factors that contribute to the overall quality of the Winchester environment and its sense of place. An essential element of sustainable development is to ensure that social and economic growth occurs within the context of ensuring that the environment is not only respected but considered holistically and invested in. The following briefly summarises the main issues raised under each of the sub-sections of this chapter, together with recommended approaches. The schedules that follow then detail all the responses received together with an officer response for policies CP5 – CP14.

2.0 Policy CP5 – Green Infrastructure

- 2.1 Green infrastructure is a relatively new term used to describe a range of infrastructure and facilities which include open space and recreation, woodland, green corridors, waterways and accessible countryside. Together these form a network of natural and semi-natural areas which provide a range of health and well-being benefits as well as other functions, e.g. potentially providing for biodiversity, flood attenuation, etc.
- 2.2 Policy CP.5 of the Preferred Option supports the development of Green Infrastructure (GI) and the Policy was generally supported, especially by a number of statutory consultees. A number of the comments were generally supportive but wanted specific references added to open space, allotments, equestrian uses, etc. Others emphasised the importance of effective management of GI and partnership/cross-boundary working.
- 2.3 The links to Policy CP1 (open space and recreation) and other policies were highlighted, with some people wanting Policies CP1 and CP5 to be combined (or other combinations). Some development interests were concerned that there may be

additional requirements which would affect the viability of development, or that developer requirements would be double-counted.

- 2.4 Since the publication of the Preferred Option the PUSH Green Infrastructure Strategy has been published for consultation. This proposes various 'strategic level' GI proposals, including the Forest of Bere Land Management Initiative which is promoted as a sub-regional GI initiative. The City Council has undertaken work in house to gather information on GI assets and commissioned consultants to draw this together, analyse it and produce recommendations for GI policies and improvements in the District. A stakeholder workshop was held as part of the GI Study in December 2009 and will inform the Study.
- 2.5 The Study has not been finalised but is expected to conclude that additional work would be needed to justify quantitative standards of provision for GI, other than where they already exist for various GI components such as open space and recreation. Such standards are not, therefore, likely to be developed through the Core Strategy and this removes much of the rationale that may have existed for combining Policies CP.1 (open space and recreation standards) and Policy CP.5 (GI). The Study, when finalised, is however likely to enable Policy CP.5 to be revised to be more locally distinctive. It may also enable more detail to be added to some of the strategic allocations, which all include general allocations for GI/gaps.

Conclusion and Recommended Approach to Policy CP5

- 2.6 Policy CP5 has received general support but the Policy and its explanatory text need to make clear its relationships with other policies which also deal with elements of GI, such as CP1 (open space), CP6 (biodiversity), etc. The Policy is currently quite general and the GI Study should provide the basis to make it more 'locally distinctive', which it is recommended be done.

Recommended Approach:

1. To amend Policy CP.5 and its supporting text to take account of the recommendations of the Green Infrastructure Study, currently being produced, to enable it to be more locally distinctive, as advised by the Planning Inspectorate.

2. To amend the explanatory text to Policy CP5 and other related policies as necessary to ensure the linkages between Green Infrastructure, open space, biodiversity, etc are fully acknowledged, along with the benefits of cross boundary and partnership working, whilst avoiding unnecessary repetition.

3.0 Policy CP6 - Biodiversity

- 3.1 Policy CP6 addresses the Councils obligation to biodiversity within the District. The policy addresses how biodiversity and nature conservation sites will be safeguarded at the local level and how development which may affect these sites will be dealt with, as guided by SE Plan and PPS9.
- 3.2 There was support for the policy, particularly from a number of the Statutory Consultees, but several of those who responded to the consultation were concerned that there was not a clear distinction between the different levels of designation and the required action; in particular the 'precautionary approach'.

Conclusion and Recommended Approach to Policy CP6

- 3.3 It is recommended that the reference to the precautionary approach is clarified in the policy text, which also needs to be revised to make it more locally distinctive and to take account of the recommendation of the Sustainability Appraisal. The District's important water environment needs further emphasis, which may be achieved either through changes to policy CP6, or by changing Policies CP5 (green infrastructure) or CP7 (water environment). The explanatory text should be amended to distinguish between the status of different sites and to link with other related policies (e.g green infrastructure).

Recommended Approach

1. Update the explanatory text to clarify the status and level of protection of sites;
2. Amend policy CP6 to clarify that the precautionary approach only applies to SPAs and SACs.

3. Amend Policy CP6 (or the Policies on water environment (CP7) and green infrastructure (CP5)) to reflect the unique water related aspects of the District.

4.0 Policy CP7 – Flooding, Flood Risk and the Water Environment

- 4.1 Policy CP7 focuses on the water environment in the District.
- 4.2 The Environment Agency supports the Flood Risk aspects of the policy and explanatory text, but advises that the policy needs to stress the importance of the District's groundwater resource and the issue of water quality, particularly in reference to the role in providing water for abstraction. The Environment Agency also supported the Sustainability Appraisal's conclusion on improving policy CP7 by strengthening the criteria listed. Some comments raised concerns about flood risk issues or problems with the sewerage system in particular areas. There were also comments suggesting that there was duplication between some policies, or that CP7 did not add anything to national policies.

Conclusion and Recommended Approach to Policy CP7

- 4.3 It is recommended that there should be further reference to the particular and distinctive water environment in the District, either by amending Policy CP7's wording or by changes to Policies CP5 (green infrastructure) or CP6 (biodiversity). The explanatory text should also be amended to refer to matters such as the water companies' management plans, water quality, and Strategic Flood Risk Assessments.

Recommended Approach

1. That the explanatory text be amended to refer to the Water Companies' management plans, SUDs maintenance and water quality, and to clarify the position on Strategic Flood Risk Assessment;
2. Amend Policy CP7 (and/or Policies CP5 and CP6) to include specific reference to the unique water quality issues in Winchester.

5.0 Policy CP8 - Cultural Heritage and Landscape Character

- 5.1 The District has a diverse heritage which underpins its special character, including ancient monuments, listed buildings, historic parks and gardens, conservation areas and historic battlefields. The historic environment, if well managed, should not always been seen as a constraint to change, but as a catalyst for regeneration and diversification. In addition to the many formally designated sites and buildings within the District, there is a wealth of quality buildings and sites with locally-important features and the District's distinctive landscape character derives from a combination of natural and man-made elements. The recognition of its special qualities and their retention and enhancement is essential for the conservation of the District's unique sense of place.
- 5.2 A limited number of responses were received to this section of the Plan, however the Policy as expressed at present fails to sufficiently local distinct, it therefore needs to be rewritten to follow the PINS advice.

Conclusion and Recommended Approach to Policy CP8

- 5.3 Given the range and extent of heritage and landscape features within the District, it is important to retain policy guidance. The draft policy therefore needs to be amended to include references to features of local distinctiveness and to follow the 'what, where, when and how' approach.

Recommended approach

1. To review the policy to refer to (buried) archaeology and to reflect advice from PINS and to be more locally distinct, particularly given the range and number of protected features in the District.
2. To clarify the intention of the policy to delete 'cultural' from the title.

6.0 Policy CP9 – South Downs National Park/Area of Outstanding Natural Beauty

6.1 The Preferred Options document's Policy CP9 deals with development within the (then) proposed South Downs National Park and the East Hampshire Area of Outstanding Natural Beauty (AONB). Since the Core Strategy's publication the National Park has been confirmed and will replace/extend the AONB. Most respondents generally support CP9, with some suggesting that it needs more emphasis on various aspects. The potential 'gateway' role of several of the District's larger settlements was noted by several respondents.

Conclusion and Recommended Approach to Policy CP9

6.2 Policy CP9 needs to be amended to reflect the designation of the National park and the imminent de-designation of the AONB. The likely timing of adoption of the Core Strategy in relation to the establishment of the National Park Authority suggests that the Core Strategy's policy would have several years 'shelf-life' before being replaced by Development Plan Documents prepared by the National Park Authority. On this basis it is recommended that a policy on the National Park should be retained and that it should be revised to reflect the aims of government policy on National Parks, the South East Plan and relevant aspects of the current South Downs Management Plan. This would help to add an element of local distinctiveness.

Recommended Approach:

1. To amend Policy CP9 and update it as necessary, in order to reflect the recent confirmation of the National Park, the consequent de-designation of the East Hampshire Area of Outstanding Natural Beauty and the establishment of the new National Park Authority.

7.0 Policy CP10 - Settlement Gaps

- 7.1 Policy CP.10 defines settlement gaps between various settlements which are at potential risk of coalescence. It carries forward the gaps defined in the Winchester District Local Plan and proposes the retention of open land adjoining the SDAs, as required by the South East Plan.
- 7.2 The comments on the Preferred Option consultation indicate a clear division of opinion concerning the validity and purpose of defined settlement gaps and also highlight differences of interpretation regarding current Government guidance and the provisions of the South East Plan. Some respondents are very supportive of the existing policy or want additional gaps to be designated, whilst others suggest the principle of gaps conflicts with Government and South East Plan policy or want specific gaps deleted.

Conclusion and Recommended Approach to Policy CP10

- 7.3 The designation and maintenance areas of open land between the SDA at North Fareham and the neighbouring settlements of Wickham, Funtley and Knowle and, similarly, the SDA at Hedge End and its neighbouring settlements (including Durley/Durley Street) would be in accordance with the SEP's strategy for the South Hampshire sub-region - indeed, it is one of the requirements for the development of the SDAs (Policy SH2 of South East Plan). The identification of gaps in these areas is, therefore, considered necessary and should be retained. As these open areas are critical in creating the settlement pattern around the SDAs, it would be more logical to add this requirement in the relevant part of the 'spatial strategy' section of the Core Strategy (currently Policies SH4 and SH5). This would also help avoid the repetition alleged by some respondents.
- 7.4 The urban areas identified by the Core Strategy (Winchester, Whiteley and Waterlooville) are all larger than the SDAs and subject to strategic site allocations which are themselves of a substantial scale. These urban areas and allocations have a strategic role and there is therefore justification for adopting a similar approach to the SDAs in terms of gaps.
- 7.5 The other settlement gaps relate to the rural settlement structure, rather than the urban areas and major developments. Nevertheless, these gaps also help to maintain the District's settlement pattern especially where there is a risk of settlement

coalescence. Like urban/major development gaps, these rural gaps are a tool for managing settlement pattern, not a local landscape designation. They too should, therefore, feature within the 'spatial strategy' section of the Core Strategy, not the 'topic' policies. The Core Strategy already refers to the precise extent of these gaps being reviewed as part of the Development Management and Site Allocations DPD and this should be retained, as the extent of these gaps should not be finalised until potential development needs for the rural settlements have been taken into account.

Recommended Approach:

1. Delete Policy CP10 and deal with the designation of gaps within the 'spatial strategy' section of the Core Strategy. The gaps should be related to the various spatial areas and would fall into two main types/purposes:
2. Gaps which help define the major settlement structure and strategic allocations, by maintaining areas of open land between the SDAs and neighbouring settlements and maintaining separation between urban areas (Winchester. Whiteley, Waterlooville), including strategic development allocations, and adjoining rural settlements;
3. Gaps which help define the rural settlement pattern by maintaining gaps between smaller settlements, where there is a threat of coalescence or change to the settlement pattern.

Design

8.0 Policy CP11 – Ensuring High Quality Sustainable Design

8.1 This section of the Core Strategy puts forward a Policy (CP11) aimed at securing high quality sustainable design within new development. There has been significant support for the Policy, with most of the concerns relating to whether the Policy should include or cross-refer to other matters such as Code for Sustainable Homes standards and whether its requirements would affect the viability of development. Some people are promoting the highest possible standards of design or sustainability, whilst others are concerned that the Policy's requirements are already excessive.

Conclusion and Recommended Approach to Policy CP11

8.2 It is concluded that the Policy strikes a reasonable balance between the need for high quality design and the need to ensure requirements are viable and achievable. However, some rewording will be needed to clarify what is expected in terms of 'high quality sustainable design', and to ensure that the Policy is sufficiently flexible and 'locally distinctive'.

Recommended Approach:

1. That Policy CP11 is reworded to make it clearer what is expected in terms of achieving high levels of sustainable design, to ensure that it is sufficiently flexible to respond to local circumstances; and to ensure that it is locally distinctive.

9.0 Policy CP12 – Ensuring the Effective Use of Land

9.1 This section of the Core Strategy puts forward a Policy (CP12) aimed at securing the effective use of land, including a minimum density requirement. There has been significant support for the Policy, but sometimes subject to concerns about whether sufficient account is taken of local circumstances. On the other hand, some comments promote higher densities.

Conclusion and Recommended Approach to Policy CP12

- 9.2 It is concluded that the Policy strikes a reasonable balance between the need to make efficient use of land and the need to ensure that local character is respected. However, the explanatory text should be rewording to make it more explicit that care will be needed to ensure that densities are compatible with existing character and patterns of development, especially within the rural settlements.

Recommended Approach:

1. That the explanatory text to Policy CP.12 is reworded to make it more explicit that in determining the most appropriate density in rural areas great care will be needed to ensure that it is compatible with the existing character and patterns of development within the settlement.

10.0 Policy CP13 – Sustainable Low and Zero Carbon Built Development

- 10.1 This section of the Core Strategy puts forward a Policy (CP13) aimed at helping n to achieve low and zero carbon development. It seeks to achieve various levels of the Code for Sustainable Homes in advance of the dates set by Government. There is considerable support for the Council to take a radical approach to setting high standards in respect of achieving low and zero carbon developments. However there is also concern about the costs of implementing the policy and its potential affect on development viability.
- 10.2 The Council has therefore commissioned a study by consultants (Element Energy) to test the costs of meeting the policy's requirements and to recommend whether these might need to be modified to take into account viability, whilst at the same time allowing the Council to push forward with effective policies to tackle carbon reduction and climate change. The consultants report can be viewed at the LDF evidence pages of the Councils website.
- 10.3 It concludes that “the cost impact of changes to Building Regulations is expected to be significant, at around a 5% increase on current construction costs when the 2013 standards are introduced and 10 to 20% increase when Zero Carbon Homes policy is introduced in 2016. The additional cost related to complying with Policy CP13 is estimated at a further 15% - 20% of current base build costs up to 2016, largely related to the costs of achieving the Code Level 5 energy and water standards.

The on-cost of Policy CP13 over the cost of meeting regulations increases in 2016, once the Code Level 6 requirement is enforced – a total on-cost of 25% of current base build costs *in excess* of the cost of complying with Zero Carbon policy. These on-costs are mitigated to some extent on-sites where large wind is available...”

- 10.4 The report goes on to recommend a number of options to reduce the costs by moving away from the Code for Sustainable Homes requirement for on-site CO2 reductions of 100% at Levels 5 and 6: “a number of alternatives to Policy CP13 have been developed and their cost implications assessed...in each case, the requirement for on-site CO2 reduction is set at 70% of Regulated emissions, in line with the requirements of the zero carbon homes standard. The requirement for additional contribution to offsite measures, in order to offset the residual emissions, timing of introduction of increased water consumption standards and overall Code Level requirement are varied between the four options.”
- 10.5 The options would have the same CO2 reduction benefits as the current policy, but move away from the emphasis in the Code for Sustainable Homes on on-site renewable energy provision, which can be very costly at the higher code levels. Build costs would be reduced by allowing some of the energy reductions to be through a financial contribution to off-site measures (a ‘Buy-Out Fund’) and possibly by delaying the introduction of specific energy or water saving requirements. The additional build costs are most significant in the early years of the Plan period, when the requirements are significantly in advance of the Building Regulations and Code for Sustainable Homes (the options range from a additional 7% - 15%), but reduce under all options to about 6% above the regulatory requirements at 2016.
- 10.6 These options recommended by the study could significantly reduce the likely build cost implications of the Policy, which would greatly improve its chances of being supported by the Planning Inspectorate. Experience has shown that many other authorities’ submitted carbon reduction policies which have been rejected, either due to inadequate demonstration of special circumstances, or their effect on viability.

Conclusion and Recommended Approach to Policy CP13

- 10.7 It is clear that there need to be a balanced and sufficiently flexible approach to ensure that development viability is not unduly affected, which would undermine deliverability. However, it is considered that there are the local circumstances which would warrant higher standards than those currently applied nationally and the viability study shows how these standards could be arranged so as not to undermine development viability. It is recommended that Policy CP13 be redrafted

to move away from the Code for Sustainable Homes' energy requirements and towards the options in the viability study which allow for off-site carbon reductions through a Buy-Out Fund, particularly for residential development.

Recommended Approach:

1. That Policy CP13 be redrafted, especially the first 2 bullet points, to reflect the recommendations of the Winchester Viability Study by allowing development to contribute to off-site carbon reduction measures rather than meeting the highest levels of the Code for Sustainable Homes in relation to energy. The timing of the introduction of the various requirements should also take account of the additional build cost over and above the regulatory requirements likely to be in force at the time.

11.0 Policy CP14 – Renewable and Decentralised Energy

- 11.1 This section of the Core Strategy puts forward a Policy (CP14) aimed at promoting renewable and decentralised energy. This complements Policy CP13 which sets requirements for low and zero carbon development. As with CP13, there is considerable support for the Council to take a radical approach to setting high standards in respect of achieving low and zero carbon developments, but also concern about the costs of implementing the policy and its potential affect on development viability.
- 11.2 The Council has therefore commissioned a study by consultants (Element Energy) to test the costs of meeting the policy's requirements and to recommend whether these might need to be modified to take into account viability, whilst at the same time allowing the Council to push forward with effective policies to tackle carbon reduction and climate change. The consultants report can be viewed at the LDF evidence pages of the Councils website.
- 11.3 It concludes that the hierarchy set out in Policy CP14 may not be necessary, as the measures promoted are likely to be needed anyway to meet the requirements of Policy CP13.

Conclusion and Recommended Approach to Policy CP14

11.4 A sufficiently flexible approach is needed to ensure that development viability is not unduly undermined. In redrafting Policy CP13 it will be necessary to consider whether the hierarchy in the first part of CP14 needs to be retained, either within the Policy or the explanatory text. It is, however concluded that the second part of the Policy is important and should be retained.

Recommended Approach:

1. That Policy CP14 is reviewed and reworded in the light of the recommendations made in the Winchester Viability Study, especially whether the hierarchy points 1-4 should be retained. The Policy should continue to promoting renewable and decentralised energy technologies (second part of the Policy).

Schedule of Responses for Policies CP5 – CP14**Policy CP5 – Green Infrastructure**

Policy CP5 – Green Infrastructure		
Response No./ Organisation	Summary of Key Issues	WCC Officer response Recommended Approach
54 (Portsmouth Water), 25 (New Alresford Town Council)	Paras 12.12 – 12.13 <ul style="list-style-type: none"> • The proposed Havant Thicket reservoir will provide recreational facilities which will help offset pressure from housing. • Key views of Alresford should not be destroyed. 	Noted.
Sustainability Appraisal/Strategic Environmental Assessment – extract of SA/SEA report on Core Strategy Preferred Option:		
<p>As clearly explained in the supporting text to this policy, the introduction of GI into new developments will have multiple benefits which range across virtually the whole set of SA objectives. There are clear synergies between this policy and other policies protecting biodiversity, the water environment and managing climate change. To enable incorporation of appropriate GI at the early planning stages the policy should give clear guidance as to the recognised standards to which the policy refers. The overall impact should be cumulative, long term and of very positive on the Council's overarching aim to achieve sustainable development whilst meeting its share of the demands of the national housing requirement.</p>		
	<u>Support Policy CP5</u>	

Policy CP5 – Green Infrastructure		
Response No./ Organisation	Summary of Key Issues	WCC Officer response
		Recommended Approach
1994, 2273, 3136, 10037 4 (Bishops Waltham Parish Council) 86 (Environment Agency) 2191, 10451, 10450, 10269 (MOD), 3198 (WinACC), 84 (South East England Regional Assembly), 91 (Natural England)	<ul style="list-style-type: none"> • Support Policy CP5. • Accept the recommendations of the experts in these matters. • Strongly support the approach to Green Infrastructure which we consider to be technically sound and sufficiently proactive. • Support CP5. Delivery of the preferred strategic allocation at Bushfield Camp could make a significant contribution to this policy. • Support the green infrastructure strategy and will continue to ensure that, in meeting the needs of development, its plans and proposals will also meet the objectives of sustainable development and the green agenda although. Although there are no protected habitats on the Peter Symonds College site, in bringing forward future plans the College will develop improved on-site biodiversity, as a part of the landscape infrastructure of the site. 	The support is noted and welcomed.

Policy CP5 – Green Infrastructure		
Response No./ Organisation	Summary of Key Issues	WCC Officer response
		Recommended Approach
2592 (Forestry Commission), 3199 (Sport England), 3071, 3135 , 2107, 2116, 10284, 10289, 10401, 10411, 10426, 10427, 10035, 10253, 10423, 10455	<ul style="list-style-type: none"> The preparation of master plans for Worthy Down and Southwick Park will include proposals for green infrastructure, as necessary and when required. <p><u>Comments on CP5</u></p> <p>Would like some recognition that allotments can provide a valuable resource within such infrastructure, and that the further development and uptake of allotments should be actively encouraged in the setting out of green infrastructure.</p> <p>CP5 should be strengthened to include a commitment to provide and manage green infrastructure networks, reflecting SE Plan Policy CC8. The policy should be closely linked with CP1.</p> <p>Would like to see a reference in the supporting text on the need to ensure delivery and long term effective</p>	<p>Maximising opportunities for sport, recreation and play, to promote healthy lifestyles, is central to several of the themes of the Sustainable Community Strategy and to the Core Strategy’s objective of providing the necessary facilities in the right place at the right time. The appropriate provision of allotment space forms part of the District Open Space standards and is dealt with under Core Strategy Policy CP1.</p> <p>In helping to set out the broad strategic framework for the future of spatial planning in the District, Policy CP5 supports the key objectives and policies for achieving and maintaining a high quality environment. It is also included within the delivery plan and monitoring and implementation</p>

Policy CP5 – Green Infrastructure		
Response No./ Organisation	Summary of Key Issues	WCC Officer response
		Recommended Approach
	<p>management of a green infrastructure network through partnership working. The policy text should also acknowledge cross border working. Also advise the Council to incorporate more wording which demonstrates the linkages between the Green Infrastructure and other policies in the Core Strategy e.g. CP1 Open Space, Sport and Recreation. This would not only further demonstrate the multifunctional benefits of Green Infrastructure, but may also open up a diverse range of funding and management sources.</p> <p>Welcome the comments on green infrastructure but concerned that this does not promote a balanced approach, as defined in Policy CC8 of the South East Plan. The key to the delivery of Green Infrastructure is cost effective provision and maintenance. We would welcome a statement that promotes and recognises cost effective and active management of green infrastructure (e.g. forestry, agriculture and horticulture as well as other land uses). We would suggest that biodiversity in this section could be significantly shortened and cross-referenced to policy CP6: Biodiversity. This would help promote a more balanced approach. Additionally this section should be linked to Policy CP1: Open Space,</p>	<p>framework, both of which underline the importance of timely delivery and the ongoing effectiveness of implementation. It is not considered necessary, therefore, for the Policy itself to make specific reference to the future management of green infrastructure and GI networks. However, the importance and shared value in cross border working and partnership working, involving other authorities, agencies and organisations as appropriate, can usefully be referred to in the supporting text. The explanatory text may also need revisions, as suggested, to improve links with other policies and avoid repetition.</p>

Policy CP5 – Green Infrastructure		
Response No./ Organisation	Summary of Key Issues	WCC Officer response Recommended Approach
	<p>Sport and Recreation, Policy CP2: Transport and Policy CP3: Economic Growth and Diversification.</p> <p>Support, but the SE Plan defines green infrastructure to include outdoor sports facilities, with natural or artificial surfaces, either publicly or privately owned, including tennis courts, bowling greens, sports pitches, golf courses, athletics tracks, school and other institutional playing fields and outdoor sports areas. CP5 and the supporting text should be amended to ensure that these types of open space are supported in urban and rural locations.</p>	<p>Providing improvements to the open space network and built recreation facilities throughout the District is the subject of the Core Strategy's Policy CP1. Policy CP.1 promotes improvements which will form part of the wider infrastructure needs that developers will be expected to fund. The improvements themselves will then be delivered through the development management process.</p> <p>The importance of open space as a key component in the enhancement of the District's green infrastructure is made clear in the supporting text to Policy CP1. It is accepted, however, that a linking reference to CP1 and the role of open space, sport and recreation could usefully be made in the supporting text to CP5.</p>

Policy CP5 – Green Infrastructure		
Response No./ Organisation	Summary of Key Issues	WCC Officer response
		Recommended Approach
	<p>This is a policy for ad hoc provision and does not meet the requirement of the SE Plan "to plan, provide and manage connected and substantial networks of accessible multi-functional green space".</p> <p>Without a planned mechanism for delivery we believe that this will not be achieved and would result in an adverse impact on the European designated sites. Winchester should set out its own programme that would identify sites, set out the standards that would be adopted and the mechanisms by which these would be funded. Also wish to see Winchester acknowledge the cross-boundary issues in relation to GI and an acknowledgement on working in partnership with PUSH and others to aid delivery of the PUSH-wide Green Infrastructure Strategy once published. Outside the PUSH area of Winchester GI should be identified to accord With Policy CC8 of SEP.</p> <p>Object because, as currently worded, CP.5 is too vague and is likely to result in additional open space</p>	<p>The Council has commissioned a Green Infrastructure Study for the District (both the PUSH and non-PUSH parts) which will take account of the strategic requirements and allocations of the South East Plan and be consistent with the recently published GI Strategy for the PUSH area of south Hampshire. The District Study will identify sites and networks of sites which are key to the development and delivery of GI; address the issue of whether standards would be most relevant to the needs of the District and; take into account matters of partnership and cross-boundary working, not least in regard to the PUSH GI Strategy. With regard to delivery and funding, these issues will also be dealt with under the provisions of Policies CP1 and CP23. The resultant GI Study will inform and guide the next stage of the Core Strategy and other relevant documents within the Local Development Framework.</p> <p>Further recommendations on the standards for provision of Green Infrastructure in new</p>

Policy CP5 – Green Infrastructure		
Response No./ Organisation	Summary of Key Issues	WCC Officer response
		Recommended Approach
	<p>requirements and or financial contributions being placed on developers which may make some sites uneconomic. The policy gives no guidance about what types of development will be expected to contribute to the green infrastructure network nor indicate at what level of development the policy will apply. The Policy adds nothing to the regional policy on green infrastructure contained in the South East Plan Policy CC8 and should either be deleted or re-written.</p> <p>Lack of reference to air strips within the District gives rise to concern, as these create noise and disturbance contrary to the tranquillity aims of green infrastructure and other environmental objectives.</p> <p>The section on walking and cycling in the LDF is non-committal. There is no discussion about how we might fundamentally address the issues that prevent people</p>	<p>development, the GI networks planned for the District and the types and scale of development which will be expected to contribute to these are likely to be made within the GI Study. This is currently being prepared and will inform both the later stages of the Core Strategy. It is accepted that Policy CP5 needs to be revised to make it more 'locally distinctive' and to include relevant recommendations from the GI Study. The Policy would then form the basis for more detailed GI policies, which are likely to be included in subsequent DPDs and which would set out more specific requirements or standards of provision, if appropriate.</p> <p>Policy CP5 aims to be a clear and straightforward expression of District-wide strategic objectives for the consolidation and enhancement of Green Infrastructure and it would be inappropriate for the Policy to contain a breakdown of the individuals, communities and numerous user groups for whom green infrastructure is an appreciated and valued</p>

Policy CP5 – Green Infrastructure		
Response No./ Organisation	Summary of Key Issues	WCC Officer response
		Recommended Approach
	<p>doing things that are obviously beneficial. As with other comments made, there is no consideration of other non motorised users such as equestrians.</p> <p>CP5 is vague and unclear and fails to realise that it is not only national parks that are of importance to biodiversity. Successful development of Green Infrastructure depends on a coordinated approach towards planning and development.</p> <p>Suggest integration of the approach to Green Infrastructure with an evidence-based approach to the rural urban fringe, combining proposed policies CP5 and CP10 to create a positive management policy. This will require separate evidence to justify which is appropriate for West of Waterlooville. Grainger recognise the benefit of a Green Infrastructure allocation for West of Waterlooville to provide a setting and add amenity to the development. However, a lack of rationale has been</p>	<p>component of a high quality environment. The Core Strategy emphasises that the provision of a wide range of different types of open space and sports facilities and access to these is a primary means of achieving several of the important outcomes of the Sustainable Community Strategy, particularly health and well being.</p> <p>CP5 does not does not refer to the National Park, let alone suggest that only National Parks are important for biodiversity. It is recognised that a coordinated approach is needed and the Policy and its explanatory text seek to achieve this.</p> <p>It is agreed that there are synergies between Policies CP5 (GI) and CP10 (Gaps), hence the allocation of land for GI and gaps in association with the strategic allocations (see also responses to comments on Policy CP10). It is also accepted that further work is required to refine the strategic allocations and to produce 'conceptual masterplans', as recommended by</p>

Policy CP5 – Green Infrastructure		
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	<p>provided by the local authority, to justify the quantum of overall distribution and its function across the site.</p> <p>There seems to be double-counting between CP1 and CP5, as most of the open space typologies are green infrastructure. These policies should be combined.</p>	<p>the Planning Inspectorate. These will need to be justified, although the Core Strategy may not specify a quantum of GI as this may be too detailed. Whilst the purpose of Policy CP1, in regard to open space, sport and recreation, is complementary to and supportive of Green Infrastructure policy, there is no double-counting of the requirements for GI, open space and recreation. The GI Study will make recommendations about GI standards, but is unlikely to recommend the inclusion of a quantitative standard in the Core Strategy. It is not therefore considered necessary or appropriate to merge the two Policies, although revisions to Policy CP5 and its explanatory text should clarify that open space and recreation are elements of GI.</p> <p><u>Recommended Approach:</u></p> <ol style="list-style-type: none"> 1. To amend Policy CP5 and its supporting text to take account of the recommendations of the Green Infrastructure Study, currently being produced, to enable it to be more

Policy CP5 – Green Infrastructure		
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		Recommended Approach
		<p>locally distinctive, as advised by the Planning Inspectorate.</p> <p>2. To amend the explanatory text to Policy CP5 and other related policies as necessary to ensure the linkages between Green Infrastructure, open space, biodiversity, etc are fully acknowledged, along with the benefits of cross boundary and partnership working, whilst avoiding unnecessary repetition.</p>

Policy CP6 Biodiversity

Policy CP6 - Biodiversity		
Response No./ Organisation	Summary of Key Issues	WCC Officer response and Recommended Approach
Sustainability Appraisal/Strategic Environmental Assessment – extract of SA/SEA report on Core Strategy Preferred Option:		
It is recognised that increased levels of development could result in cumulative negative effects on biodiversity such as the potential loss of habitat, increased air pollution as well as noise and light pollution and pressures on water resources and supply. Subsequently, the SA/SEA recommends that the final paragraph of the PO policy is tightened up to read ‘Where adverse impacts are unavoidable and satisfactory mitigation cannot be achieved, development proposals will only be supported if the benefits of the development clearly outweigh the harm to the habitat and/or species’.		
4 (Bishops Waltham Parish Council), 86 (Environment Agency), 2273, 3136, 10269, 10440	<u>Support CP6</u> Strongly support approach to biodiversity; technically sound and sufficiently proactive. Refer to threats to biodiversity from climate change.	Support welcomed. Comments on climate change noted.
84 (SEERA), 2107, 10284, 10289, 10401, 10411,	<u>Object to CP6</u> Need to distinguish between the status of different sites more clearly.	Agree that the wording should be changed to distinguish between the different types of protected

Policy CP6 - Biodiversity		
Response No./ Organisation	Summary of Key Issues	WCC Officer response and Recommended Approach
10426, 10427		<p>sites.</p> <p><u>Recommended approach:</u></p> <p>Update the explanatory text to clarify the status and level of protection of sites.</p>
2107, 2116, 10284, 10289, 10401, 10411, 10426, 10427	Concerned that the precautionary principle and requirement for all development to improve biodiversity could delay and make development unviable, particularly for individual householders.	<p>The precautionary principle is a requirement of the Habitats Regulations and is therefore mandatory. How it is applied will be determined on a case by case basis by the Council.</p> <p><u>Recommended Approach:</u></p> <p>Amend policy CP6 to clarify that the precautionary approach only applies to SPAs and SACs.</p>
2191, 10451	The term 'biodiversity gain' is not clearly defined.	This forms part of the overall aim of the Policy and is not a specific requirement for new

Policy CP6 - Biodiversity		
Response No./ Organisation	Summary of Key Issues	WCC Officer response and Recommended Approach
		developments. No further clarification is therefore needed..
3071	Policy does not meet all the requirements of the SE Plan.	<p>The draft policy covers the main principles of the SE Plan relating to biodiversity</p> <ul style="list-style-type: none"> • to protect via avoiding or mitigating impacts • maintaining the existing interest, • to improve the current situation by enhancing existing, establishing new sites and connecting existing sites. <p>The proposed policy meets all of these requirements and should not repeat the SE Plan or the regulations.</p>
3204	Policy duplicates requirements of the SE Plan and PPS3.	Winchester's geology allows the District to play a key role in the water cycle within Hampshire. Not only is it the source of the Itchen

Policy CP6 - Biodiversity		
Response No./ Organisation	Summary of Key Issues	WCC Officer response and Recommended Approach
		<p>chalk river, itself designated a European site, but it is also vital for the functioning of the coastal SACs and SPAs. With 80% of the District designated as a principal aquifer, any impacts on water quality would have major consequences on nature conservation as well as on drinking water. Therefore these particular issues are all part of the local distinctiveness of the District and it is considered that they require a specific biodiversity policy within the Core Strategy and that the policy should make clearer reference to them.</p> <p><u>Recommended Approach:</u></p> <p>The unique water related aspects of the District should be reflected by amending Policy CP6, or by changes to the Policies on water</p>

Policy CP6 - Biodiversity		
Response No./ Organisation	Summary of Key Issues	WCC Officer response and Recommended Approach
		environment (CP7) and green infrastructure (CP5).
10253	The Policy should link in with green infrastructure policy.	It is agreed that there are links with the policy on green infrastructure, which has benefits for wider biodiversity and incorporates many of the designated sites. The biodiversity issues need to be covered adequately, either by strengthening Policy CP6 or changes to CP7 and CP5 (see Recommended Approach above).
10253	The Policy should go further to recognise the importance of all biodiversity, not just priority habitats and species.	'Priority habitats' are those which are rare, declining in area/number or host to 'priority species' (declining rapidly or confined to a limited area) and therefore need specific protection; non-priority habitats are those which are not threatened and have a lower biodiversity interest. The policy is therefore focused on where

Policy CP6 - Biodiversity		
Response No./ Organisation	Summary of Key Issues	WCC Officer response and Recommended Approach
		protection is needed. The importance of all biodiversity is recognised within CP6, as well as through the green infrastructure policy (CP5).

Policy CP7 Flooding, Flood Risk and Water Environment

Policy CP7 - Flooding, Flood Risk and Water Environment		
86 (Environment Agency)	<p><u>Paragraph 12.22</u></p> <p>Support principle of designing and agreeing drainage infrastructure and pollution prevention measures up front.</p>	The support is welcomed
86 (Environment Agency), 120	<p><u>Paragraph 12.17</u></p> <p>Need to refer to EA restriction on certain activities within groundwater Source Protection Zones (SPZ).</p> <p>Could refer to work on Itchen Navigation which would have benefits ranging from environmental to recreation.</p>	Noted. While the benefits of the Itchen navigation project are recognised, it does not need to be referred to in the Core Strategy.
94 (Portsmouth Water)	<p><u>Paragraph 12.19</u></p> <p>Should refer to PW Draft Water Resources Management Plan which sets out long term infrastructure planning as some of the PUSH IWMP conclusions have been superseded.</p>	<p>It is agreed that the water companies' management plans are important and should be mentioned.</p> <p><u>Recommended Approach:</u></p> <p>Refer to the Water Companies' management plans in the accompanying text.</p>

Policy CP7 - Flooding, Flood Risk and Water Environment		
94 (Portsmouth Water)	<p><u>Paragraph 12.21</u></p> <p>Water efficiency is part of overall solution to the review of abstraction licences.</p>	Noted.
86 Environment Agency, 87 (GOSE)	<p><u>Paragraph 12.22</u></p> <p>Should recognise that CP7 aims to protect drinking water as well as private abstraction. Recommend inclusion of policy for first time rural sewerage in the most environmentally sensitive parts of the District.</p> <p>PPS25 states LDDs should identify the specific flood related issues which will need to be addressed. Important to consider these flood issues for the strategic allocations. Advise that the Council clarify that there are two different Strategic Flood Risk Assessments in Appendix B.</p>	<p>Whilst the advantages of first time rural sewerage schemes are acknowledged, the Council is not aware that either of the water companies are proposing such schemes, or that the scale of development proposed would warrant this. Therefore it is not felt that there is evidence on which to base such a policy.</p> <p>It is agreed that the coverage of the Strategic Flood Risk Assessments needs to be clarified.</p> <p><u>Recommended Approach</u></p> <p>Amend explanatory text to clarify the position regard Strategic Flood</p>

Policy CP7 - Flooding, Flood Risk and Water Environment		
		Risk Assessments.
Sustainability Appraisal/Strategic Environmental Assessment – extract of SA/SEA report on Core Strategy Preferred Option:		
<p>The SA/SEA identifies localised surface water flooding as a particular problem for the district and there may be future issues over water supply which is dependent on groundwater. In addition, the River Itchen SSSI and SAC is experiencing pollution pressures from agriculture and sewage discharges from population growth. It is recommended that the policy wording is changed to 'require compliance with the Water Framework Directive' rather than seek compliance. In summary the flooding policy in the PO does not raise any negative sustainability issues for the SA objectives.</p>		
Response No./ Organisation	Summary of Key Issues	WCC Officer response and Recommended Approach
4 (Bishops Waltham PC), 86 (Environment Agency), 91 (Natural England), 94 (Portsmouth Water), 96 (Southern Water), 2273, 3136	<p><u>Support Policy CP7</u></p> <p>The Policy is in line with PPS25 and flood risk management hierarchy. Support reference to SUDs but need reference to ensuring maintenance through legal agreements. Support policy in taking account of water capacity.</p>	<p>The support is welcomed.</p> <p><u>Recommended Approach:</u></p> <p>Amend supporting text to reflect need to ensure long-term maintenance of SUDs systems.</p>
1918, 10193, 10256	Support policy in connection with the local flooding issues at Wickham.	The support is welcomed

Policy CP7 - Flooding, Flood Risk and Water Environment		
Response No./Organisation	Summary of Key Issues	WCC Officer response and Recommended Approach
31 (Shedfield PC)	<p><u>Object to Policy CP.7</u></p> <p>Need to use local knowledge of flooding to inform development proposals.</p>	The SFRA took into account all recorded local flooding events. The importance of local knowledge in informing Flood Risk Assessments at the site level is noted.
86 (Environment Agency)	Concern that some WWTWs may not be able to accommodate growth without careful planning – recommend early talks with Southern Water and phasing development.	Noted. The Council has consulted with the key agencies and stakeholders who have also commented on this document and acknowledge the need for ongoing discussions as the details and timings of the proposals emerge.
2293	Existing sewage system in Wickham cannot take additional housing – need appraisal of the existing system.	Southern Water has been consulted about the sewerage system in Wickham and advise that the system has some capacity, but will require upgrading to accommodate larger scale development. This advice will be

Policy CP7 - Flooding, Flood Risk and Water Environment		
		clarified and taken into account in determining the scale and timing of development appropriate for Wickham.
86 (Environment Agency), 96 (Southern Water)	Bullet point 5 doesn't sufficiently emphasise the need for development to be underpinned by infrastructure.	The delivery and implementation plan that will accompany the Core Strategy will provide the detail of the nature of the improvements required, when they will be delivered and who will fund the improvements. This will also need to link to any phasing and contingency planning.
86 (Environment Agency)	The policy could go further on the protection of groundwater quality, surface water and land quality.	<p>Given the importance of the District as a principal aquifer and . the additional information provided by the EA for the District, it s recommended that the explanatory text be expanded.</p> <p><u>Recommended Approach:</u></p> <p>Add to explanatory text to refer to the importance of water quality.</p>

Policy CP7 - Flooding, Flood Risk and Water Environment		
87 (GOSE)	<p>There is duplication with policy SS2.</p> <p>CP7 and SS2 refer to the sequential test and sequential approach separately.</p>	<p>SS2 is to be deleted therefore it is necessary to retain this level of detail in CP7.</p> <p>According to PPS25 practice guidance, the Sequential Test is used for site level, following the sequential approach when no reasonable available sites with lower probabilities of flooding appropriate for the proposed land use can be identified. Discussions with the EA have confirmed this approach without the need for specific sequential test for the Core Strategy and its proposed allocation policies.</p>
3204	Policy duplicates SE Plan and PPS25	<p>Given the significance of the water environment and water resources in Winchester, a specific policy is required. It is accepted that it needs to be more locally distinctive by referring to these matters.</p> <p><u>Recommended approach:</u></p>

Policy CP7 - Flooding, Flood Risk and Water Environment		
		Policy CP7 (and/or Policies CP5 and CP6) should be reworded to include specific reference to the unique water quality issues in Winchester.
10058	Policy should state that there will be a presumption against development which adversely affects any watercourse.	Such a statement would be too wide-ranging by referring to all watercourses and failing to define what is meant by 'adversely affect'. CP7 includes adequate safeguards at present.

Policy CP8 - Cultural Heritage and Landscape Character

CP8 Cultural Heritage and Landscape Character		
Sustainability Appraisal/Strategic Environmental Assessment – extract of SA/SEA report on Core Strategy Preferred Option:		
<p>The district has a rich and varied historic environment both man made and natural which should be protected for its own sake; and the policy clearly provides this protection by progressing the relevant SA objectives. The policy will also have additional benefits for the economy, biodiversity and the quality of life of residents through ensuring that key assets are protected and enhanced.</p>		
Response no./ Organisation	Summary of key issues	WCC officer response and Recommended Approach
4 (Bishops Waltham PC); 90 (English Heritage); 1918; 2191; 2273; 2293; 3136; 10193; 10231; 10255; 10256; 10269; 10451; 10440 (Winchester Lib Dem City Council Group)	<p>Support policy with following comments :-</p> <ul style="list-style-type: none"> • Landscape character must be taken into account when determining greenfield development • Policy needs to refer to buried archaeology • Should not release greenfield sites for development <ul style="list-style-type: none"> • Support in principle but need to be clear that the policy does not supersede carbon reduction measures 	<p>Support noted – the purpose of this policy is to require all new development to respect and enhance the existing historic and landscape features of the District, given how diverse the District is and how many designated sites exist across the District. It is acknowledged that the policy should refer to buried archaeology. The cultural/landscape character of the District does not in itself prevent all greenfield development.</p> <p>New developments will still be required to comply with other strategic policies in relation to the need to reduce carbon emissions etc.</p>

CP8 Cultural Heritage and Landscape Character		
87 (GOSE)	Policy needs to reflect PPS7 and the distinction between national and local landscape designations	<p>Noted – need to review the policy following the advice from PINS to express policies on the basis of ‘what, where, when and how’, given the diversity of both the sites and designations it will be necessary to expand the policy to be more ‘locally distinct’</p> <p><u>Recommended Approach :-</u> To review the policy to refer to (buried) archaeology and to reflect advice from PINS and to be more locally distinct, particularly given the range and number of protected features in the District.</p>
3071	Policy should also refer to the arts, heritage, museums, libraries, etc in additional to considering the impact of new development on outdoor cultural heritage	<p>The policy as expressed emphasises heritage features (listed buildings, ancient monuments) rather than cultural features (museums, arts) but does not preclude these uses if they fall within the general remit of landscape and heritage. Policy CP22 however, seeks to retain existing cultural and arts facilities.</p> <p><u>Recommended Approach :-</u> To clarify the intention of the policy to delete ‘cultural’ from the title.</p>

CP8 Cultural Heritage and Landscape Character		
3204	Policy is not required as these elements are covered by PPS7, PPG15 and PPG16 and the SE Plan	<p>Given the local diversity of the District and the range of designated sites, a policy is justified to ensure these features are taken into account when considering new development etc.</p> <p>It will also be necessary to cross reference to the South Downs National Park given that a number of settlements within this also have features covered by this policy. It is, however, accepted that the policy needs to be more 'locally distinctive', as recommended by PINS (see above).</p>
2515	Object to Bushfield Down whose development will contradict this policy	<p>Noted – this site is currently subject to various studies, including a landscape assessment and an archaeological appraisal, to assess its potential for development, prior to the site being allocated for development in the Core Strategy (see report to DF Cttee on 15th Dec 2009, CAB1944LDF).</p>

Policy CP9 – South Downs National Park/Area of Outstanding Natural Beauty

Policy CP9 – South Downs National Park / Area of Outstanding Natural Beauty		
Response No./ Organisation	Summary of Key Issues	WCC Officer response Recommended Approach
Sustainability Appraisal/Strategic Environmental Assessment – extract of SA/SEA report on Core Strategy Preferred Option:		
<p>This policy reinforces and provides support for designations that are designed to protect landscape and wider cultural areas within the District. This approach will progress key sustainability objectives for the biodiversity, heritage and specifically the character and quality of Winchester’s landscape. National Park designations, and this policy’s support for those aims, also provides additional benefits for the tourism sector, by increasing the attractiveness and desirability of the location as an area to visit and recreate in which has potential long term benefits for Winchester’s wider economy, in particular rural businesses. Wider benefits for existing and new residents are also possible where accessibility to the countryside is improved and supported in the context of new/ permitted development.</p>		
4 (Bishops Waltham PC), 91(Natural England), 2273,10231	<u>General Support for CP9/ para.12.30</u> <ul style="list-style-type: none"> • Support CP9. There is a need to improve public access, particularly in ‘gateway’ towns and villages. • Natural England is pleased to see this policy, given the implications of the designation for a large part of the District. We welcome paragraph 12.30 which clearly demonstrates the Council’s commitment to joint 	The support is noted and welcomed.

Policy CP9 – South Downs National Park / Area of Outstanding Natural Beauty		
Response No./ Organisation	Summary of Key Issues	WCC Officer response Recommended Approach
38 (Twyford PC) , 87 (GOSE), 3071, 10058, 10253, 10255 (South Downs Joint Committee), 10273 (HCC Cllr Porter)	<p>working in this regard.</p> <ul style="list-style-type: none"> Support CP9. Wickham will be a gateway to the South Downs National Park. <p><u>Comments on CP9/paras. 12.29-12.30</u></p> <ul style="list-style-type: none"> The wording of CP9 does not fully incorporate the statutory purposes of designation, as required by the SE Plan and excludes the social and economic aspects. The application of the policy to settlements is not stated - there should be further guidelines based on the AONB Planning Guidelines. CP9 includes the wording “protect and enhance” and does not include the wording set out in PPS7 (paragraph 21), which refers to the “conservation of the natural beauty of the landscape and countryside” and the “conservation of wildlife and the cultural heritage are important considerations”. Emphasis should also be given to proposals which support the economies and social well being of the 	<p>This policy and its explanatory text reflect the position on the South Downs National Park’s emerging designation at the time the Preferred Options document was published (prior to formal confirmation by the Secretary of State).</p> <p>The National Park has now been confirmed and will come into operation on the 1st April 2010, initially under the newly formed ‘shadow’ National Park Authority. At the same time, the current East Hampshire Area of Outstanding Natural Beauty (together with the Sussex Downs AONB) will be de-designated and cease to exist, their purpose and functions having been effectively subsumed within the</p>

Policy CP9 – South Downs National Park / Area of Outstanding Natural Beauty		
Response No./ Organisation	Summary of Key Issues	WCC Officer response Recommended Approach
	<p>AONBs and their communities, including affordable housing schemes, provided that they do not conflict with the aim of conserving and enhancing natural beauty.</p> <ul style="list-style-type: none"> • The principle of protecting and enhancing this defined area is supported. (See our representation which proposes the inclusion of this area within Policy SS1). However, we object to the lack of clarity regarding the control of future development in this area. The policy should state that there is a presumption against non essential development and reflect the requirements in PPS7 and the Regional Spatial Strategy. • Cannot see how any development within the SDNP can meet the requirement to protect and enhance the landscape. • The Joint Committee is very supportive of this Policy. We consider it essential that reference is made to the conservation and enhancement of tranquillity, which forms part of the "natural beauty" of the AONB. (Ref: Principles GP6 and PF11 of the South Downs Planning 	<p>new National Park.</p> <p>It is accepted that the range of 'statutory purposes' for National Park designation is slightly greater than that for AONB designation. Therefore, the wording of Policy CP9 and supporting text should now be updated, to delete reference to the AONB and to more closely reflect the new National Park's status and consequently increased responsibilities.</p> <p>With regard to planning policy and development control functions within the National Park. The National Park Authority will assume the role of 'planning authority' for the entire Park area from April 2011. During the new National Park Authority's 'shadow' period it will have regard to the AONB Management Plan and South Downs Planning Guidelines (generated by its predecessor body, the South Downs Joint Committee). In due course, these will be replaced by the Park Authority's own</p>

Policy CP9 – South Downs National Park / Area of Outstanding Natural Beauty		
Response No./ Organisation	Summary of Key Issues	WCC Officer response Recommended Approach
	<p>Guidelines).</p> <ul style="list-style-type: none"> The influence of the South Downs National Park will impact on the surrounding areas with economic and planning pressures. It is vital that any proposals made by SDNPA are locally consulted on with the residents and businesses of the Winchester District, as well as via broader scale SDNP consultation processes. It is already clear that there may be different rules in the two parts of the district. This must not detract from the overall character of Winchester, the District or the market town of New Alresford. 	<p>policy publications and other guidance, as would the relevant parts of the saved Local Plan and Core Strategy.</p> <p>Decisions on future planning policy-making and the potential delegation of development control activity back to individual local authorities have yet to be finalised. Current negotiations with DEFRA and the Government Office are intended to lead to agreed protocols between the NPA and the local authorities on these issues. However, it would be inappropriate, at this stage, for the Core Strategy to anticipate, or seek to pre-empt, the Park Authority's detailed policies in relation to social or economic matters, or its spatial strategy and development management policy in regard to future housing or other development provisions within the National Park.</p> <p>It is accepted that interest and concern regarding the issue of tranquillity have greatly</p>

Policy CP9 – South Downs National Park / Area of Outstanding Natural Beauty		
Response No./ Organisation	Summary of Key Issues	WCC Officer response Recommended Approach
		<p>increased in recent years. However, it would not be appropriate for the Core Strategy to introduce an explicit planning policy provision relating to the Park area, although it would be relevant to add a wider District emphasis to the need to address this important issue, within the updated supporting text.</p> <p>Therefore, it is recommended that Policy CP9 should be retained and that its content be amended to reflect the aims of the National Park designation. These may include reference to tranquillity but the City Council should not attempt to produce a very detailed policy given the imminent establishment of the National Park Authority, which will produce its own detailed policies.</p> <p>With regard to the issue of consulting locally on planning matters, the new South Downs National Park Authority will be required to produce and subsequently act on its own Statement of Community Involvement. This</p>

Policy CP9 – South Downs National Park / Area of Outstanding Natural Beauty		
Response No./ Organisation	Summary of Key Issues	WCC Officer response Recommended Approach
		<p>will set out precisely how the Authority will involve all elements of the local community in the preparation, alteration and review of planning policies and planning applications within the National Park.</p> <p>New Alresford, Bishops Waltham, Wickham and Denmead lie adjacent to the National Park's boundary and may have an increasingly important gateway role. This is likely to be supported and encouraged by the strategies and policies of both the City Council and the National Park Authority.</p> <p><u>Recommended Approach:</u></p> <p>To amend the Core Strategy and to update it as necessary, in order to reflect the recent confirmation of the National Park, the consequent de-designation of the East Hampshire Area of Outstanding Natural Beauty and the establishment of the new National Park Authority.</p>

Policy CP10 – Settlement Gaps

Policy CP10 – Settlement Gaps		
Response No./ Organisation	Summary of Key Issues	WCC Officer response Recommended Approach
<p>Sustainability Appraisal/Strategic Environmental Assessment – extract of SA/SEA report on Core Strategy Preferred Option:</p> <p>The policy will be an important tool for managing development in an area of high pressure. In addition to the direct impacts of preventing settlement coalescence and protecting the setting of historic settlements, the policy will also bring about indirect benefits for the landscape, design through the better integration of new development, health and biodiversity. Hedge End and Fareham Strategic Gaps are assessed separately under Policies SH4 and SH5.</p>		
<p>13 (Denmead PC), 42 (Wickham PC), 2175, 2550, 10408, 10440 (Cllr Learney, Winchester Liberal Democrat City Council Group), 2273, 10453</p>	<p><u>Support Policy CP.10</u></p> <ul style="list-style-type: none"> • Strongly support the provision of defined Gaps which will prevent the coalescence of settlements and allow communities to develop organically and individually. The inclusion of the Denmead – Waterlooville Gap is wholeheartedly welcomed. • Support the retention of the Meon Gap and the Fareham SDA to Knowle/Wickham Gap (subject to the extension suggested in relation to SH5). • Strongly support the retention of the Kings Worthy – 	<p>The support is noted and welcomed.</p>

Policy CP10 – Settlement Gaps		
Response No./ Organisation	Summary of Key Issues	WCC Officer response Recommended Approach
(PUSH)	<p>Abbots Worthy gap.</p> <ul style="list-style-type: none"> • Support CP10. The South East Plan indicates that gaps can be considered relevant and necessary in areas of significant growth, where they can be regarded as a valid mechanism for shaping the settlement pattern. • The identification of gaps in the South Hampshire sub-region is in accordance with the PUSH Policy Framework for Gaps. 	
2116, 10232, 10064, 2116, 84 (South East England Regional Assembly), 10460, 10423, 2991, 10427, 87 (GOSE), 2169, 10420, 3199	<p><u>Comment/Object to CP10</u></p> <p>Bishops Waltham/ Swanmore/ Waltham Chase/ Shedfield/ Shirrell Heath - the amount of development proposed is not of a scale that would endanger the separate identity of these settlements. Denmead/ Waterlooville -The amount of new development proposed for Denmead will entail some greenfield development but this is not of such a scale that it would result in the merger of these settlements.</p> <p>The Settlement Gaps between Bishops Waltham, Swanmore, Waltham Chase, Shedfield and Shirrell Heath</p>	<p>With regard to Bishops Waltham/ Swanmore/ Waltham Chase, the Core Strategy's Preferred Option identifies these as Level 1 or Level 2 settlements, a key component of its 'Market Towns and Rural Areas Strategy'. The housing requirement for these will be delivered through a combination of infilling and redevelopment on brownfield sites and modest greenfield releases. Nevertheless, any greenfield opportunities which may need to be brought forward should not be located where they would lead to substantial</p>

Policy CP10 – Settlement Gaps		
Response No./ Organisation	Summary of Key Issues	WCC Officer response Recommended Approach
(Sport England SE), 10423, 3204, 38 (Twyford PC), 123, 10253, 3136, 33 (South Wonston PC), 31 (Shedfield PC), 4 (Bishops Waltham PC), 952; 953; 957; 962; 975; 979; 982; 994; 1014; 1015; 1017; 1025; 1026, 1028; 1037; 1040; 1041; 1048; 1053;1070; 1073; 1084; 1085; 1093; 1094; 1095; 1098; 1099; 1101;	<p>are less important because these villages have already lost a lot of their separate identity and have a semi-suburban appearance. The proximity of the South Downs National Park will ensure that a high quality environment remains in the area. The provision of local employment is more important.</p> <p>The continuing need to retain the physical separation of Winchester from Kings Worthy/Headbourne Worthy is already addressed by policy WT2.</p> <p>Whiteley/ Fareham/ Fareham Western Wards - no need or justification for a local gap. The new neighbourhood extension at Whiteley involves land to the north of Whiteley and will have no impact on this land. Fareham SDA/ Knowle/ Wickham - covered by Policy SH2 of the South East Plan and proposed policy SH5. Hedge End SDA - covered by Policy SH2 of the South East Plan and proposed policy SH4.</p> <p>The SE Plan does not contain a policy on gaps and the second sentence of para.12.38 no longer applies. Apart from the SDAs, policy on gaps is set out in PPS7 and a clear justification is needed for retaining gaps</p>	<p>changes in the settlement pattern or the individual character and separate identity of such settlements. To do so would conflict with the Core Strategy's spatial strategy and the proposed gaps are intended to ensure that this does not happen. The South Downs National Park is not located so as to provide the settlement separation which the gap policy seeks to secure.</p> <p>The Denmead/Waterlooville Gap is clearly very sensitive given the scale of the Waterlooville MDA and the development interest that has been shown (as illustrated in the SHLAA) elsewhere between Denmead and Waterlooville. It is, therefore, an important element of the strategy to maintain the settlement pattern and separation of the South Hampshire Urban Areas from smaller rural settlements. Similar considerations apply in relation to the other 'urban' areas of Winchester and Whiteley, where gaps are important in maintaining the settlement pattern and separation of rural settlements.</p> <p>Where settlement 'character' may be perceived as</p>

Policy CP10 – Settlement Gaps		
Response No./ Organisation	Summary of Key Issues	WCC Officer response Recommended Approach
1103; 1104; 1113; 1114; 1119; 1125; 1126; 1127; 1130; 1135; 1136; 1137; 1142; 1158; 1165; 1168; 1176; 1185; 1186; 1189; 1190; 1191; 1197; 1204; 1206; 1209; 1210; 1213; 1217; 1220; 1229; 1234; 1236; 1237; 1238; 1239; 1242; 1247; 1249; 1250; 1251; 1253; 1256; 1257; 1261; 1264; 1269; 1270;	<p>PPS7 states that “carefully drafted, criteria-based policies in LDD's, utilising tools such as landscape character assessment”, should provide the necessary protection for areas of landscape, wildlife, historic or architectural value without the need for “rigid local designations that may unduly restrict acceptable, sustainable development and the economic activity that underpins the vitality of rural areas” (para.24).</p> <p>Object to Policy CP10 which is not in accordance with the South East Plan. A positive spatial approach, outlining mechanisms for change and conservation, should be used and not arbitrary gap designations.</p> <p>PPS7 advises against local landscape designations and community support for gaps is not sufficient justification for them. Policy CP10 should be deleted or, if not, the Otterbourne - Southdown Gap should be removed.</p> <p>CP10 lists a series of Settlement Gaps – does the evidence base justify the inclusion of these? Should the policy be in the first section of the Core Strategy, as the proposed gaps affect the delivery strategy and would have a spatial impact on the physical composition of the area.</p>	<p>having changed over time, this is more likely to have been the result of an intensification of development and redevelopment within the settlement, rather than the result of any significant greenfield development beyond its recognised boundaries. It should also be borne in mind that the designation of a ‘gap’ is intended to allow sufficient land to be made available for employment and housing needs whilst preventing the type, location or scale of development which would compromise the functioning or reduce the overall integrity of the intervening gap. Paragraph 12.39 makes it clear that the precise boundaries of gaps will be reviewed in the Development Management and Allocations DPD alongside the allocation of any land necessary for development. Depending on the level of development proposed by the Core Strategy, and local needs, it may be necessary to review the boundaries of a gap to permit essential development in the most suitable location.</p> <p>Government planning policy guidance and the South East Plan make it clear that, in both</p>

Policy CP10 – Settlement Gaps		
Response No./ Organisation	Summary of Key Issues	WCC Officer response Recommended Approach
1279; 1287; 1293; 1294; 1314; 1321; 1322; 1323; 1329; 1332; 1339; 1345; 1349; 1355; 1359; 1360; 1366; 1368; 1372; 1373; 1379; 1382; 1383; 1384; 1389; 1391; 1395; 1397; 1406; 1407; 1411; 1412; 1426; 1429; 1431; 1432; 1433; 1438; 1439; 1443; 1444; 1449; 1455; 1456; 1457; 1458; 1459;	<p>The reference to gaps for the SDAs in CP10 does not exactly match the description in South East Plan Policy SH2.</p> <p>Strategic gaps and local gaps should be removed from the policies. The protection of the countryside should be re-assessed to ensure that protection is placed only where it is appropriate. Development provision should outweigh countryside considerations unless they are fully justified by the circumstances.</p> <p>This policy which is too restrictive and does not give sufficient scope for outdoor sports and ancillary buildings where required. Suggest amendments to allow for these facilities.</p> <p>To be effective, the Core Strategy should not impose arbitrary strategic gap designations but instead take a positive spatial approach, outlining mechanisms for change and conservation. PPS12 paragraph 2.6 refers.</p> <p>The definition of gaps is addressed far too narrowly. The objectives should take account of: the landscape setting of Winchester; the ancient villages of Compton Street, Twyford, Headbourne Worthy, Abbots Worthy and</p>	<p>national and regional terms, local gap designations should only be applied as an additional layer of planning control in specific situations where this can be appropriately justified and where reliance on countryside policies and associated tools, such as landscape character assessment, will be insufficient to provide adequate planning control.</p> <p>However, the SEP also states that gaps can be considered relevant and necessary in areas of significant growth; where they can be regarded as a valid mechanism for shaping the settlement pattern and a key opportunity to provide open/recreation space as part of the necessary green infrastructure.</p> <p>The South East Plan requires the retention of open land (i.e. gaps) in conjunction with the planned SDAs at Fareham North and at Hedge End. The purpose of these gaps would be to maintain the important separation between the two SDAs and the distinct settlements of Wickham, Knowle and Funtley, to the north of</p>

Policy CP10 – Settlement Gaps		
Response No./ Organisation	Summary of Key Issues	WCC Officer response Recommended Approach
1460; 1465; 1471; 1482; 1484; 1492; 1494; 1504; 1511; 1512; 1514; 1521; 1533; 1536; 1547; 1551; 1563; 1573; 1584; 1595; 1602; 1624; 1628; 1630; 1633; 1643; 1644; 1648; 1666; 1667; 1675; 1679; 1682; 1694; 1698; 1703; 1706; 1710; 1714; 1729; 1734; 1738; 1740; 1744; 1748; 1751; 1757; 1773;	<p>Littleton; the settings of villages with conservation areas and; a settlement's identity/ historic setting, rather than simply the separation of urban development.</p> <p>Support the principle of settlement gaps but this is breached with the proposal to build at Barton Farm.</p> <p>It is important to maintain gaps between large settlements and small towns/villages. A buffer zone should be created to protect the SDNP (running from Clanfield to Colden Common) or, alternatively, these parishes should be removed from PUSH, as the authorities have a statutory duty to protect the National Park.</p> <p>Support CP10 but it should recognise the area north of Winchester as a green buffer between the developed southern and northern parts of the County. The area should be designated as a settlement gap.</p> <p>There is no mention of a South Wonston/Worthy Down/ Winchester gap.</p> <p>Support the concept of Gaps but the gap from Shedfield Parish to Bishops Waltham and Swanmore should be larger to prevent coalescence, as there is a large influx of</p>	<p>Fareham and Durley/Durley Street, to the north of Hedge End.</p> <p>It is therefore clear that the SE Plan does not prevent the designation of gaps, and indeed requires it in some cases. In view of this, the gaps between the proposed SDAs and existing settlements should clearly be retained.</p> <p>Some of the other gaps listed in Policy CP.10 are also needed to separate urban locations with strategic allocations and existing settlements, namely Denmead - Waterlooville, Winchester – Kings Worthy/Headbourne Worthy, Winchester – Compton Street, and Whiteley – Fareham/Western Wards. These too have a strategic role in defining the settlement pattern and should be retained.</p> <p>GOSE raise an important point by questioning whether these are 'topic' policies or 'spatial' designations. It is agreed that they are spatial designations and that they should not be considered as a form of local landscape</p>

Policy CP10 – Settlement Gaps		
Response No./ Organisation	Summary of Key Issues	WCC Officer response Recommended Approach
1777; 1780; 1781; 1784; 1790; 1792; 1793; 1795; 1796; 1802; 1806; 1809; 1820; 1822; 1823; 1831; 1912; 1913; 1918; 2039; 2267; 2281; 2284; 2293; 2405; 2477; 2487; 2876; 2929; 3084; 10049;10051; 10052;10053; 10054;10055; 10056;10065; 10066;10067; 10071;10072; 10073;10074; 10076;10078; 10080;10081;	<p>school children and traffic from areas as far away as Portsmouth.</p> <p>It is important to retain the gaps, but there should also be new gaps defined between Bishops Waltham and Durley and Bishops Waltham and Upham.</p> <p>Wickham should be included in the existing Gap for Bishops Waltham/Swanmore/Waltham Chase/ Shirrell Heath/ Shedfield, to prevent it merging with Shedfield and Shirrell Heath. (Standard letter, some respondents adding comments opposing further development at Wickham, for reasons such as effect on the character of the village, traffic, SDA planned nearby, etc).</p>	<p>designation as this is clearly not their purpose. It would, therefore, be more appropriate to replace the components of Policy CP.10 within the 'spatial strategy part of the Core Strategy document, where the various gaps can be split between the spatial areas.</p> <p>It is accepted that gap designations should only be used where necessary and appropriate. Gaps are not, however, a landscape designation and Government policy advises against local landscape designations. Potential gaps were assessed in producing the current Local Plan and those new gaps suggested in the responses would have been included in this assessment but rejected in terms of the criteria used. In most cases the extent of the gap and/or the lack of real threat of coalescence did not warrant designation of a gap. However, PUSH has recently produced a Policy Framework on Gaps and the gaps suggested by respondents, along with those already in Policy CP10 should be reassessed against this guidance.</p>

Policy CP10 – Settlement Gaps		
Response No./ Organisation	Summary of Key Issues	WCC Officer response Recommended Approach
10083;10086; 10087;10088; 10089;10090; 10093;10094; 10098;10099; 10100;10101; 10102;10113; 10114;10115; 10116;10117; 10118;10119; 10120;10121; 10122;10123; 10124;10127; 10128;10129; 10131;10133; 10134;10135; 10136;10137; 10139;10140; 10141;10142; 10144;10145; 10146;10147; 10148;10149; 10151;10152; 10153;10154;		<p>There is no recognised planning mechanism to establish a specific buffer zone around a National Park. The boundary of the South Downs National Park has been set according to established criteria and, therefore, this does not observe parish boundaries, many of which are transected by it. It is not for the Core Strategy to amend either the boundary of the National Park, or the PUSH area, both having been established already in other statutory documents.</p> <p><u>Recommended Approach:</u></p> <p>Delete Policy CP10 and deal with the designation of gaps within the ‘spatial strategy’ section of the Core Strategy. The gaps should be related to the various spatial areas and would fall into two main types/purposes:</p> <ul style="list-style-type: none"> - Gaps which help define the major settlement structure and strategic allocations, by maintaining areas of open land between the SDAs and neighbouring settlements and maintaining separation

Policy CP10 – Settlement Gaps		
Response No./ Organisation	Summary of Key Issues	WCC Officer response Recommended Approach
10155;10156; 10157;10158; 10161;10162; 10163;10164; 10166;10169; 10170;10172; 10173;10176; 10179;10180; 10181;10182; 10184;10185; 10186;10187; 10188;10192; 10193;10194; 10195;10197; 10198;10199; 10200;10201; 10202;10205; 10207;10209; 10211;10215; 10216;10217; 10218;10219; 10220;10221; 10222;10223; 10224;10225;		<p>between urban areas (Winchester. Whiteley, Waterlooville), including strategic development allocations, and adjoining rural settlements;</p> <ul style="list-style-type: none"> - Gaps which help define the rural settlement pattern by maintaining gaps between smaller settlements, where there is nevertheless a threat of coalescence or change to the settlement pattern.

Policy CP10 – Settlement Gaps		
Response No./ Organisation	Summary of Key Issues	WCC Officer response Recommended Approach
10227;10228; 10231;10234; 10239;10240; 10384;10398; 10414;10415; 10441;10445, 2116, 2169, 2991, 3204, 10064, 10253, 10390, 10420, 10423, 10427, 10460		

Design**Policy CP11 Ensuring High Quality Sustainable Design**

Policy CP11: Ensuring High Quality sustainable Design		
Response no./Organisation	Summary of key issues	WCC officer response and Recommended Approach
Sustainability Appraisal/Strategic Environmental Assessment – extract of SA/SEA report on Core Strategy Preferred Option: The appraisal shows that this policy address the core aims and objectives contained in the SA framework and no adverse effects are identified through the process. The policy provides good foundations for ensuring long term support for and improvements to sustainable design which will be instrumental in assisting in the creation of good quality development.		
4, 42 (Wickham Parish Council), 1994, 2273, 3136, 3198 (WINACC), 10269 (MOD), 10440, 10450	<ul style="list-style-type: none"> • General support for the policy 	Support for the policy is noted and welcomed
86, (Environment	<ul style="list-style-type: none"> • The policy should cover other aspects of 	These aspects are covered in other policies, e.g.

Policy CP11: Ensuring High Quality sustainable Design		
Response no./Organisation	Summary of key issues	WCC officer response and Recommended Approach
Agency), 89 (HCC), 2191, (Church Commissioners), 2740 (North Hedge End Consortium), 3071, 3198 (WINACC), 3199 (Sport England), 10253, 10423, 10451, 10455.	<p>sustainable design such as flood risk, water use, preventing pollution, managing waste, and CFSSH/BREEAM standards. It should be explicitly linked with CP13 and CP7 and include water resources and waste in sustainable design in line with the SE Plan</p> <ul style="list-style-type: none"> • It might be difficult to comply with the policy at an outline stage. The level of information required to support an outline application needs clarification • The expectation that new development should meet the highest standards of sustainable design is excessive, and unclear what is actually required. Viability and flexibility needs to be built into the policy. If national standards are going to be exceeded then there will need to be a firm evidence base to support this. 	<p>flood risk is dealt with in policy CP7, and CFSSH in CP13. Although it is recognised that these are important aspect of sustainable design it would not be appropriate to repeat them again in this policy. As a general principle in preparing a planning application full consideration should be given to all the relevant policies in the Core Strategy and it is considered unnecessary and unduly repetitious to cross reference policies.</p> <p>It is recognised that it might be difficult to comply with the detail of this policy at an outline stage, but the required statement should be able to give a clear indication as to how the various criteria will be addressed at subsequent stages of the proposed development</p> <p>It is agreed that the policy should be made clearer as to what is actually meant by ‘the highest standard of sustainable design’. While it is important that this policy is applied flexibly and that viability is fully taken into account, good design is the result of a proper process which flows from a thorough understanding of context, and therefore good design does not</p>

Policy CP11: Ensuring High Quality sustainable Design		
Response no./Organisation	Summary of key issues	WCC officer response and Recommended Approach
	<ul style="list-style-type: none"> • Recycling should be added to the criteria set out in subsection e) of the policy • If development is to go ahead then the highest standards should be expected as a minimum, and new development should be as close to carbon neutral as modern technology will allow; these requirements should also apply to infrastructure. • The following should be added to the criteria set out in the policy ‘ how the design of the proposed development facilitates straight forward links with everyday activity destinations including shops, workplaces, and community facilities to encourage access by walking running or cycling’. • The terms sustainability and sustainable are 	<p>necessarily equate with expensive design.</p> <p>Again recycling is dealt with in policy CP13 and need not be repeated here.</p> <p>There is disagreement between a number of commentators on the Core Strategy who have expressed the view that this policy is too rigid and too onerous, with those who would seek to make the highest possible standards more rigorous. In practice, while it is perfectly reasonable to aspire to the highest standards possible, this policy will need to be applied flexibly if it is to be found sound.</p> <p>Creating accessible neighbourhoods is a critical element in creating sustainable communities. To some extent this is covered in policy CP2, but it is agreed that a reference to creating accessible neighbourhoods to encourage sustainable modes of transport would be appropriate in this section as one of the required design criteria.</p> <p>Sustainability is about balancing economic growth</p>

Policy CP11: Ensuring High Quality sustainable Design		
Response no./Organisation	Summary of key issues	WCC officer response and Recommended Approach
	<p>frequently used but there is little impression of what they actually mean; they are not supported by evidence as to how they can be best achieved. All policies should be directed to reducing the consumption of scarce resources if the terms are going to mean anything.</p> <ul style="list-style-type: none"> The need for this policy is questioned as it only repeats national guidance. It should therefore either be deleted or included in the Development Management DPD 	<p>social development and protecting the environment. It is not just about conserving resources. As far as this policy is concerned it has been concluded above that it will need to be clearer as to what is meant by high levels of sustainable design</p> <p>Although this policy is by necessity consistent with and picks up on both national and regional policy, it will need to ensure that it provides a locally distinctive Winchester. It is accepted that the wording of the policy will therefore need amending to ensure that it is 'locally distinctive'.</p> <p><u>Recommended Approach:-</u></p> <p>That Policy CP11 is reworded to make it clearer what is expected in terms of achieving high levels of sustainable design, that the Policy is sufficiently flexible to respond to local circumstances; and that the Policy is reworded to ensure that it is locally distinctive.</p>

Policy CP12 Ensuring the effective use of land

Policy CP12: Ensuring the effective use of land		
Response no./Organisation	Summary of key issues	WCC officer response and Recommended Approach
<p>Sustainability Appraisal/Strategic Environmental Assessment – extract of SA/SEA report on Core Strategy Preferred Option:</p> <p>The policy performs well against the SA objectives and no adverse impacts are identified. The policy will assist in producing a wider range of accommodation, increase the potential for public transport use (through location and density) and therefore be positive for climate change and reduce the need for greenfield sites. Overall positive and long term cumulative benefits through implementation.</p>		
<p>4 (Bishops Waltham Parish Council), 33 (South Wonston Parish Council), 89 (HCC), 2191, 2273, 10450, 10451</p>	<ul style="list-style-type: none"> • Broadly support for the policy. • Support for the principle behind the policy, but concerns that it does not take account of local circumstances. 	<p>Support noted and welcomed. See below for response to concerns about local circumstances.</p>

<p>20 (Itchen Valley Parish Council), 31 (Shedfield Parish Council), 42 (Wickham Parish Council), 87 (GOSE), 121, 1920, 2107, 2116, 2421, 2550, 3136, 3198 (WINACC), 10260, 10264, 10411, 10441, 10455,</p>	<ul style="list-style-type: none"> • Achieving the most effective use of land needs to be balanced against the need to achieve sustainability. • Densities above 30 dwellings per hectare (dph) are too high particularly in some rural locations. The case might be made for lower densities in certain local circumstances. • The policy could be taken to infer that lower densities would be acceptable. PPS3 sets 30 dph as a national indicative minimum, densities below this will need to be justified, and the evidence provided to support any lowering of densities. 	<p>The policy seeks to establish 30 dph as the minimum target for new developments, which is in line with government advice. It is important to ensure the effective use of scarce housing land, especially brownfield land which can reduce pressure to find additional greenfield sites. However, it is equally clear that achieving this target has to be consistent with the policy of achieving high standards of design, and ensuring that new development is compatible with the character and appearance of the local area.</p> <p>While it might be the case that in some circumstances densities of 30 dph and above would have an adverse impact on an area, particularly in rural locations, as a target the figure is considered reasonable. The Policy already makes clear that achieving sustainable design and responding to the character of an area are key considerations. However the supporting text should be amended to reflect the special difficulties which might arise in rural locations</p> <p>In a diverse district such as Winchester, in order to respect the character of an environmentally sensitive area, and to ensure that there is a full range of dwelling types and sizes to meet the social and economic needs of the district, the target can only be that. In some instances it will be significantly exceeded and in others development will be below this target. But in either event it is agreed that</p>
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	<ul style="list-style-type: none"> • Higher densities can often only be achieved at the expense of garden space; and or lack of adequate parking. • Density is central to sustainability, particularly in making public transport effective. Minimum densities of 30 are therefore incompatible with the aims of sustainability. • Density should not be measured in dph, as this has in the past lead to large numbers of one-two bed flats. But it should be measured in habitable rooms per hectare. • It is suggested that a more area based approach to densities is developed, to reflect the differing characteristics of the various settlement sizes, i.e. urban, market town and village. 	<p>deviations from this figure will need to be fully justified.</p> <p>Both of these important criteria will need to be taken into account when determining applications and density alone could never be the sole justification for allowing an otherwise unacceptable development.</p> <p>Higher densities are more compatible with many sustainability objectives, particularly improving public transport and certain renewable energy technologies, and this needs to be put into the balance in determining the acceptability of an application for development. But they cannot override other criteria aimed at creating quality places. Higher densities are more appropriate to urban areas and the policy reflects this.</p> <p>DPH is currently the means of determining density used in government guidance and the South East Plan. Measuring habitable rooms is not without its own problems both in determining what constitutes a habitable room, and how to deal with large open multi-functional spaces</p> <p>Even within an area appropriate densities may vary considerably. In some village cores and the centres of market towns relatively high densities can be quite acceptable, whilst on the more sensitive edges lower densities might be more appropriate. Therefore</p>
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	<ul style="list-style-type: none"> • The policy should be amended to take account of the need to provide 'local needs housing' in rural areas which might have to be at lower densities • The policy conflicts with the assumptions used in the SHLAA which has lead to it over-estimating the number of houses likely to come forward 	<p>setting average densities for an area, does not resolve this particular issue.</p> <p>It is not clear why local needs housing would necessarily need to be at lower densities than other nearby development. The density of local needs housing should be assessed against the need to make good use of available land with ensuring that the development is sensitive to its context.</p> <p>The SHLAA uses a range of density assumptions according to the location of the site, from 30 dph in smaller settlements to 75 dph in Winchester town centre. These are appropriate densities given that 30 dph is a minimum and that the aim is to make best use of land. However, these densities were only the starting point for estimating SHLAA site capacity and the site capacity/density was adjusted where the character of the site or its surroundings suggested this would be necessary. Therefore it is not accepted that the SHLAA over-estimates site capacity.</p> <p><u>Recommended Approach:-</u></p> <p>That the policy remains substantially the same but the supporting text is expanded to make it more explicit that in determining the most appropriate density in rural areas great care will be needed to ensure that it is compatible with the existing character and patterns of development within the settlement.</p>
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Policy CP13 Sustainable Low and Zero Carbon Built Development

Policy CP13 - Sustainable Low and Zero Carbon Built Development		
Response no./ Organisation	Summary of key issues	WCC officer response and Recommended Approach
Sustainability Appraisal/Strategic Environmental Assessment – extract of SA/SEA report on Core Strategy Preferred Option: The policy will be instrumental in meeting the Governments targets relating to climate change and the impact of new development. No adverse impacts are identified but the issue of the increased costs of these construction techniques is identified and noted in the appraisal. Some uncertainty regarding costs may influence the extent to which the policy is effectively implemented and the commensurate benefits realised. There may also be indirect benefits health and biodiversity which will accrue over time form more sustainable approach to build.		
33, 2273, 2609, 3136, 3198 (WINACC), 10037, 10055, 10269 (MOD).	General support for Policy CP13	Support for the policy is noted and welcomed
84 (SEERA), 86, (Environment Agency), 87 (GOSE), 89 (HCC),	The Council should take the lead on climate change	It is agreed that it is vital that the Council shows leadership in addressing this important topic. That is why it is seeking to develop radical but sound policies to ensure that it remains at the forefront of tackling

Policy CP13 - Sustainable Low and Zero Carbon Built Development		
Response no./ Organisation	Summary of key issues	WCC officer response and Recommended Approach
94 (Portsmouth Water Co), 1994, 2107, 2116, 2191, 2198, 2421, 2740, 3071, 10064, 10253, 10284, 10289, 10387, 10399, 10401, 10411, 10412, 10413, 10426, 10427, 10451, 10455.		<p>climate change.</p> <p>Responses to this policy are divided between those who think it does not go far enough and those who express the view that it is too radical and will affect the viability and delivery of development proposals. The potential costs of meeting the Policy's requirements were also raised by the Sustainability Appraisal (see above).</p> <p>The Council has therefore commissioned a study by consultants (Element Energy) to test the costs of meeting the policy's requirements and to comment on whether these might need to be modified to take into account viability, whilst at the same time allowing the Council to push forward with effective policies to tackle carbon reduction and climate change.</p> <p>The consultants report concludes that "the cost impact of changes to Building Regulations is expected to be significant, at around a 5% increase on current construction costs when the 2013 standards are introduced and 10 to 20% increase when Zero Carbon Homes policy is introduced in</p>

Policy CP13 - Sustainable Low and Zero Carbon Built Development		
Response no./ Organisation	Summary of key issues	WCC officer response and Recommended Approach
		<p>2016. The additional cost related to complying with Policy CP13 is estimated at a further 15% - 20% of current base build costs up to 2016, largely related to the costs of achieving the Code Level 5 energy and water standards. The on-cost of Policy CP13 over the cost of meeting regulations increases in 2016, once the Code Level 6 requirement is enforced – a total on-cost of 25% of current base build costs <i>in excess</i> of the cost of complying with Zero Carbon policy. These on-costs are mitigated to some extent on-sites where large wind is available...”</p> <p>The report goes on to recommend a number of options to reduce the costs by moving away from the Code for Sustainable Homes requirement for on-site CO2 reductions of 100% at Levels 5 and 6: “a number of alternatives to Policy CP13 have been developed and their cost implications assessed....in each case, the requirement for on-site CO2 reduction is set at 70% of Regulated emissions, in line with the requirements of the zero carbon homes standard. The requirement for additional contribution to offsite measures, in order to offset the residual emissions,</p>

Policy CP13 - Sustainable Low and Zero Carbon Built Development		
Response no./ Organisation	Summary of key issues	WCC officer response and Recommended Approach
	<p>The targets for CO2 reduction should be set out in the policy; the targets in the policy are unlikely to meet the Council's Climate Change Framework targets.</p>	<p>timing of introduction of increased water consumption standards and overall Code Level requirement are varied between the four options.”</p> <p>The options would have the same CO2 reduction benefits as the current policy, but costs would be reduced by allowing some of this to be through a financial contribution to off-site measures (a 'Buy-Out Fund') and possibly by delaying the introduction of specific energy or water saving requirements. These changes could significantly reduce the likely costs of the Policy and greatly improve its chances of being supported by the Planning Inspectorate, unlike many other authorities' submitted carbon reduction policies which have been rejected. It is recommended that the options be considered further and that policy CP13 be revised accordingly.</p> <p>The Climate Change Framework is the appropriate place to establish the targets for reducing CO2 and the Core Strategy is part of the means of achieving the targets. The explanatory text to CP13 refers to the targets.</p>

Policy CP13 - Sustainable Low and Zero Carbon Built Development		
Response no./ Organisation	Summary of key issues	WCC officer response and Recommended Approach
	<p>The requirements in the policy only deal with energy and waste; they should also cover sustainable water management.</p> <p>Seeking higher levels of the Code might not accord with the advice given in the Supplement to PPS1 which states that higher standards can only be brought forward if 'local circumstances warrant'. Where is the evidence to support the Council's position.</p> <p>New construction should contain a proportion of recycled and secondary aggregates. Site gained materials should be re-used or recycled. A target should be set for the amount of recycled material</p>	<p>The policy already includes requirements for reductions in water use, in its first bullet points. Requirements 1-3 are intended to amplify the energy and waste requirements.</p> <p>The District has a particularly high carbon footprint and is partly within the PUSH area, where an Energy and Climate Change Strategy has been developed. The Renewable Energy Study demonstrates that the District has the potential to achieve low carbon development and the recent viability study recommends ways in which the policy can be made more affordable. Accordingly, it is considered that the Council can demonstrate the special circumstances necessary to justify raising the standards above the national requirements.</p> <p>This is to a large extent covered in the CFSH, and every encouragement should be given to using recycled construction materials. The Hampshire Minerals and Waste Core Strategy also includes</p>

Policy CP13 - Sustainable Low and Zero Carbon Built Development		
Response no./ Organisation	Summary of key issues	WCC officer response and Recommended Approach
	<p>used in a new development</p> <p>It is not clear how the council can impose water efficiency measures beyond those set out in the building Regulations.</p> <p>All new development should achieve:</p> <ul style="list-style-type: none"> • CFSH level 6 now or alternatively • CFSH level 4 now. 	<p>similar targets. It would not be appropriate to set detailed targets as the amount of recycled material used on a specific project will depend on a number of factors such as the nature and design of the construction and the availability of local sourced materials</p> <p>Many of the requirements of the CFSH are monitored and enforced through the Building Regulations. The planning function can only ensure that the relevant level is reached and that the developers are encouraged to incorporate a specific water saving measure into their scheme. How the relevant level in the CFSH is to be achieved is something that should be clearly set out in the design and access statement that should accompany all significant applications</p> <p>It would not be realistic or viable to impose higher standards at the present time. It is believed that the Council’s staged approach to raising the standards as set out in the policy is the right way to introduce such a radically new way of improving sustainable</p>

Policy CP13 - Sustainable Low and Zero Carbon Built Development		
Response no./ Organisation	Summary of key issues	WCC officer response and Recommended Approach
	<p>Support for the principle of tackling climate change, but the policy will impose burdens on development which could make them unviable.</p> <p>There is inadequate justification for imposing standards above the national targets. This will have an adverse effect on the economic viability of small sites.</p>	<p>design, and reducing carbon, subject to changes resulting from advice in the viability study.</p> <p>There is no doubt that raising the standards of sustainable design and carbon reduction measures will impose additional costs on development, although there will be savings for occupiers in the form of lower energy costs. It is important therefore that the policy's requirements do not unduly affect viability and the viability study makes recommendations on this which will be taken into account.</p> <p>It will also be important when assessing viability that the costs and benefits of reducing carbon emissions are balanced with the need to provide other social and physical infrastructure, not least affordable housing.</p> <p>As mentioned above the viability study looks specifically look at the issues of viability and assessed the cost of the Policy's requirements for various types and sizes of sites. The study's recommendations will be taken into account to</p>

Policy CP13 - Sustainable Low and Zero Carbon Built Development		
Response no./ Organisation	Summary of key issues	WCC officer response and Recommended Approach
	<p>The policy is unnecessary and unworkable. It is also too prescriptive. It will create undue problems in bringing forward mixed use regeneration schemes. The policy should be aspirational and linked to the viability and other costs of a scheme.</p> <p>The policy should be more flexible, and be one of encouragement rather than mandatory; it should take into account viability and deliverability; and needs to be more site specific in order to take into account the nature of the development and the particular characteristics of the site</p> <p>A balanced approach is required, sustainability is not just about energy, but needs to take into account economic and social benefits.</p>	<p>ensure that the policy is sound and deliverable.</p> <p>The Council believes it has justification for developing standards which are above the national standards and, as stated above, the policy will need to be modified to ensure that its potential impact on the viability of all scales of development is acceptable.</p> <p>It is agreed that it will be necessary to ensure that the policy does not become over prescriptive and it will need to take into account other development costs and viability. But if the policy is going to have any effect then it will have to be mandatory, and more than one of just encouraging a particular approach</p> <p>Agreed and the policy will need to be drafted to reflect this.</p>

Policy CP13 - Sustainable Low and Zero Carbon Built Development		
Response no./ Organisation	Summary of key issues	WCC officer response and Recommended Approach
	<p>There are likely to be two standards one for market housing and the other for social housing which won't be able to meet the higher standards</p> <p>The policy could have a significant effect on bringing forward housing schemes; and could have the consequence of making greenfield sites more viable.</p>	<p>Affordable housing has often led the way in terms of energy and resource-efficient development; sometimes because providers are keen innovators, sometimes as this is a requirement for public subsidy. Currently Level 3 of the CFSH must be achieved for public funding to be made available. It is reasonable for the Council to promote particular aspects of the CFSH or other sustainability measures that are important locally (as it does in its Affordable Housing SPD). However in applying the policy account will need to be taken of the economics of provision and this may require the balancing of priorities between the need to provide affordable housing and the desire to achieve specific CFSH Levels or alternative approaches to sustainable development that are now proposed. The redrafted policy will take account of the economics of provision, which has been subject to further work in the Winchester Viability Study.</p> <p>In redrafting the policy it will be essential that it is worded to ensure that it is not the case that the only schemes that are viable and therefore come forward</p>

Policy CP13 - Sustainable Low and Zero Carbon Built Development		
Response no./ Organisation	Summary of key issues	WCC officer response and Recommended Approach
	<p>There is no strategy to ensure that the local targets set out in the supporting text will be achieved</p> <p>The policy should refer to reducing the need to travel and promoting sustainable modes of transport as a means of reducing CO2. There should be a target for a percentage of new homes to be car free, which would alter depending on location</p> <p>The policy and the standards set out in it must be</p>	<p>for development are greenfield sites. The viability study considered greenfield and brownfield sites and its recommendations are therefore relevant.</p> <p>The targets are part of the Council's Climate Change Strategy. There is, therefore, a strategy although the Core Strategy will also need to be explicit as to how its policies will be monitored and delivered.</p> <p>Although this is covered elsewhere in the Core Strategy, the need to reduce travel as a carbon saving measure should be incorporated into the development requirements. However it would not be appropriate to set specific targets for car free housing as this will depend entirely on the specific characteristics of a development site, and its potential users. The Council has recently developed a Supplementary Planning Document on residential car parking.</p> <p>Agreed the policy will need to demonstrate</p>

Policy CP13 - Sustainable Low and Zero Carbon Built Development		
Response no./ Organisation	Summary of key issues	WCC officer response and Recommended Approach
	<p>consistent with PUSH and regional policy</p> <p>A significant percentage of existing homes and commercial premises should be retrofitted to bring them up to at least CFSH level 3. Any development which fails to meet the policy requirements should be required to pay into a fund to help pay for retrofitting</p>	<p>compatibility with both national and regional policy and guidance.</p> <p>New development represent a relatively small proportion of the total building stock, therefore it is important to encourage as much retrofitting as possible to bring the existing stock up to the required standard. However much of the existing stock will never become the subject of development proposals, so it would be impossible (even if it was thought desirable which is questionable) to impose mandatory higher standards on existing householders. The viability study recommends the use of a Carbon Off-Set Fund which would be able to help deliver a programme of retrofitting.</p> <p><u>Recommended Approach:-</u></p> <p>That Policy CP13 be redrafted, especially the first 2 bullet points, to reflect the recommendations of the Winchester Viability Study. This would allow development to contribute to off-site carbon reduction measures rather than meeting the highest levels of</p>

Policy CP13 - Sustainable Low and Zero Carbon Built Development		
Response no./ Organisation	Summary of key issues	WCC officer response and Recommended Approach
		the Code for Sustainable Homes in relation to energy on-site. The timing of the introduction of the various requirements should also take account of the additional build cost over and above the regulatory requirements likely to be in force at the time.

Policy CP14 Renewable and Decentralised Energy

Policy CP14: Renewable and Decentralised Energy		
Response no./ Organisation	Summary of key issues	WCC officer response and Recommended Approach
Sustainability Appraisal/Strategic Environmental Assessment – extract of SA/SEA report on Core Strategy Preferred Option: The SA has identified the potential for adverse impact, for example, in the use of monoculture to produce fuel crops which will reduce the amount of land available for food production and have adverse impacts on local biodiversity. However the clearly identified beneficial impacts for climate change, pollution and health, which are likely to be medium to long term must also be reflected. Studies to address the potential for renewable generation in the Winchester District and the most appropriate forms of energy have supported the development of this policy.		
33, 2191, 2273, 3136, 3198 (WINACC), 10037, 10451, 10453	General support for Policy CP14.	Support for the policy is noted and welcomed.
84 (SEERA), 87 (GOSE), 89 (HCC), 1994, 2107, 2116, 2421, 2740, 10040, 10064, 10253,	Policy CP14 should not be seen as an addition to CP13 requirements as it is part of delivering CFSH/BREEAM standards. The requirements are more properly addressed through the CFSH. The policy should therefore be deleted or amalgamated	Like policy CP13 this policy will need to be reviewed and revised in the light of the Winchester Viability Study undertaken for the Council by consultants (Element Energy). This concludes that the measures at levels 1 and 2 of the hierarchy may well be

Policy CP14: Renewable and Decentralised Energy		
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10255, 10269, 10284, 10289, 10401, 10411, 10423, 10426, 10427, 10455.	<p>into CP13</p> <p>The policy does not refer to the low carbon technologies set out in the Supplement to PPS1. What is the justification for supporting CHP before micro generation.</p> <p>PPS1 requires local authorities to consider identifying suitable areas for renewable energy, and that targets should be set for decentralised/ renewable/ low</p>	<p>essential anyway to meet the requirements of Policy CP.13 and also that an Off-Set Fund be developed (covering measure 3). The need for this hierarchy should, therefore, be reconsidered in reviewing in the requirements of Policy CP13.</p> <p>Nevertheless, it may be necessary for the Council to give clear policy guidance on renewable energy options, either within the Policy or the explanatory text, and the second part of the Policy remains valid.</p> <p>The study referred to above considers renewable energy and low carbon options available and their cost effectiveness for various types of development likely within the District. As noted above, this will require the first part of Policy CP14 to be reconsidered.</p> <p>The Core Strategy only considers sites of strategic importance and is generally not site specific. If it is considered necessary to identify sites for energy</p>

Policy CP14: Renewable and Decentralised Energy		
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	<p>carbon sources</p> <p>The policy needs to be consistent with the SE Plan and acknowledge the targets set out in NRM11 which are different to those set out in CP14. Is the policy consistent with SE Plan Policy NRM 14</p> <p>Concerns are expressed about the financial implications of implementing this policy in combination with the other requirements in the plan including affordable housing. The need to consider viability and deliverability need to be factored into the policy</p> <p>The policy is too prescriptive and might even militate against more effective and sustainable solutions.</p>	<p>generation then this will be undertaken through the Site Allocation DPD to be produced latter. Carbon reduction targets are set in the Council's Climate Change Strategy and the Core Strategy will introduce requirements which will help to meet these.</p> <p>Agreed; the policy will need to be compatible with the Regional Spatial Strategy and this will need to be taken into account in revising it.</p> <p>This key issue will be considered as part of the Winchester Viability Study. With economies of scale and advances in technology many of the costs of delivering renewable energy are likely to be reduced over the plan period.</p> <p>In redrafting the policy it will be essential that it is sufficiently flexible to deal with site specific</p>

Policy CP14: Renewable and Decentralised Energy		
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	<p>Flexibility is required to ensure that this policy is implemented on a site by site basis</p> <p>More details are required on how the Carbon Reduction Fund might be developed and implemented. Further justification is required as to why this fund is justified. The requirements of this fund should be set out in a DPD rather than a SPD which would carry less weight</p> <p>This policy can really only be applied to large sites of over 300 dwellings; therefore question how effective it will be; the hierarchy of renewable energy might not</p>	<p>constraints and opportunities, it will also need to be responsive to advances in renewable energy technology; to do this it cannot be over prescriptive</p> <p>The viability study undertakes further assessment of the options and also recommends an Off-Set Fund. It is agreed that more details on how it might be applied. This is linked to the issue of whether/when the Community Infrastructure Levy may be introduced by the Council and the details of its implementation need further consideration. While it is agreed that a DPD might carry more weight, if the policy in the Core Strategy is sufficiently robust then the quickest and most effective means of implementing the fund would be through a SPD. If the CIL route is used the contributions sought would be subject to examination and carry substantial weight.</p> <p>The applicability and scale of development to which it relates is one of key areas considered in the viability study. This concludes that all types and sizes of site</p>

Policy CP14: Renewable and Decentralised Energy		
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	<p>be appropriate for all sites, particularly the larger sites which might contain a range of densities</p> <p>It should be made a requirement of the policy that 20% of energy in schemes above 10 dwellings should be generated on-site. This requirement of 20% is incompatible with regional policy which only requires 10% on site renewables.</p> <p>The policy should also cover micro-generation in small schemes and conversions.</p> <p>The use of natural gas as an energy source is unsustainable. Restricting CHP to 1,000 dwellings is too high and the requirement should be lowered to 250 dwellings</p>	<p>can make an appropriate contribution to carbon reduction.</p> <p>The requirements of Policy CP13 are likely to require considerably more than 20% on-site generation but these need to be re-visited in the light of the recommendations of the viability study.</p> <p>The policy will need to consider the appropriate scale of development to which it should apply, but as a strategic policy it might not be appropriate to go into too much detail on micro generation in small schemes and conversions</p> <p>The effectiveness of CHP and its applicability will need to be the subject of further consideration. However, Policy CP14 (a) encourages CHP and criterion 1 does not limit it to schemes of 1000 dwellings or more.</p>

Policy CP14: Renewable and Decentralised Energy		
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	<p>The policy needs to make a clear distinction between the opportunities and requirements for the South Downs National Park and those areas outside. It needs to be consistent with advice set out in the South Downs Planning Guidelines</p> <p>Reducing energy consumption is incompatible with the population growth implied in the Core Strategy</p>	<p>Agreed the policy will need to take account the special circumstances regarding energy generation in the National Park; although as a environmentally sensitive area it is particularly important that new development meets the highest standards of sustainability</p> <p>With increases in both population and households it is crucial that the Council promotes the most effective and sustainable means of energy generation. However, sustainable development is also about meeting current needs, including for housing, etc.</p> <p><u>Recommended Approach:-</u></p> <p>That the Policy is reviewed and reworded in the light of the recommendations made in the Winchester Viability Study, especially whether the hierarchy points 1-4 should be retained. The Policy should continue to promoting renewable and decentralised energy technologies (second part of the Policy).</p>

