

Your Place, Your Plan

**‘Biodiversity and the Natural
Environment’**

Summary of Comments and Issues Raised

Issue 2: Biodiversity and the Natural Environment.

Introduction:

The district covers around 250 square miles of beautiful and diverse landscapes which support numerous important species. Around 40% of the district is within the South Downs National Park which has the highest landscape protection. The district covers a large and diverse area of wildlife habitat, including the Rivers Itchen and Meon , the Forest of Bere and the estuary of the River Hamble – some of which are internationally protected sites.

The SIP Consultation Questions regarding Biodiversity and the Natural Environment were:

Question 1 Do you agree or disagree with the following biodiversity and natural environment statements? - Where biodiversity net gain cannot be provided on-site, it should be allowable to offset this by enhancing biodiversity off site

Question 1b: Do you agree or disagree with the following biodiversity and natural environment statements? - We should allocate land specifically for open space or for biodiversity net gain, to provide opportunities for off-site mitigation of the effects of new development

Question 2: Do you agree or disagree with the following statement? Current development management policies for the protection of the countryside are adequate.

Question 2b Please explain your view on what new policy measures should be adopted:

Question 3: Do you think a new Green Belt is needed in the south or north of the district?

Question 3b If so, what changes in circumstances make this 'exceptional measure' necessary :

Question 3c: How would a Green Belt designation contribute to achieving sustainable development in the district and adjoining areas?

A summary of the responses received is set out below.

High level comments:

- Government party funding from developers and builders (Outside of local government control) – C75
- This is a government policy issue and agricultural policy is a mess since Brexit eg: allowing neocotinoid pesticides that kill bees (C453,
- Whether Biodiversity Net Gain (BNG) is provided on site or offset connectivity is the key without links nothing will survive or thrive E1182,
- Support overarching intention to enhance, protect and develop districts biodiversity and natural environment E1220,

1: Question 1: Do you agree or disagree with the following statements?

Do you agree or disagree with the following biodiversity and natural environment statements? - Where biodiversity net gain cannot be provided on-site, it should be allowable to offset this by enhancing biodiversity off site

Option	Citizenspace	Letters	Emails	Totals	Percent
Strongly agree	55		E1242, C597	57	15%
Agree	89		E1069, E1072, E1128, E1179 E1216, E1218 E1223, E1228 E1233, E1237	99	26%
Neither agree nor disagree	63		E1233	64	17%
Disagree	72		E1223	73	19%
Strongly disagree	84	L29,	E1221, E1221 E1230	88	23%
Total responses	363	1	17	381	100%

Question 1 Summary of responses and comments received.

A total of 381 people responded to this question with around 41% agreeing with the statement that where biodiversity net gain cannot be provided on-site, it should be allowable to offset this by enhancing biodiversity off site, around 42% said that they did not agree with this statement and around 17% of respondents didn't agree or disagree. It would appear therefore that the results are evenly split with just 1% more respondents disagreeing that BNG could be provided off site.

Reasons given for agreeing with the statement.

The majority of respondents agreeing that BNG could be provided off site also tempered this by saying that this must not be the easy option and must not take away the incentive for developers to provide BNG on site. It is considered that land allocations should not be for offsetting but a separate additional provision.

The next most stated comment was that offsetting would need to be provided and operational before any existing habitats were destroyed by development.

Some respondents did comment that this would allow a flexible approach to be taken and allow sites to come forward where they are acceptable in all other ways but unable for some genuine reason to provide BNG on site.

One respondent pointed out that if BNG is required on site then it could lead to lower density development which would be at odds with sustainable development aims of maximizing development opportunities especially around transport hubs.

Reasons given for disagreeing with this statement:

The majority of respondents disagreeing with this statement said that if BNG cannot be provided on site then the site is not suitable for development and should not be granted planning permission.

The next most popular response to this statement was that offsetting is not an adequate solution and shifts the responsibility of biodiversity challenges. Biodiversity will suffer if you allow it to be shifted to a more convenient location and will take years to

recover if it recovers at all. It can also destroy wildlife corridors and migrations routes. This ties in with another respondent questioning whether offsetting will allow BNG to become a tick box exercise.

Question 1 Summary of responses and comments received.

DISAGREE: BNG should not be allowed to be offset.

(13 minus 2 who don't want their comments published) Strongly disagree: If biodiversity net gain cannot be provided on-site, the development is not suitable for the site and should not receive planning permission (C291, C352, E1182, E1230, C3, C147, C176, C223, C246, C535, L29)

(13 respondents) Offsetting land for biodiversity/off-site mitigation is not adequate (offsets shift responsibility of biodiversity challenges) / Biodiversity will suffer if you allow it to be shifted to a more convenient location, takes years to recover if at all / damages wildlife corridors and migration routes – (C3, C58, C101, C149, C246, C273, C274, C314, C343, C514, C492, C514, C542)

Do not allow off site mitigation (C516, C542)

Plan should consider whether carbon neutral target increases the need for BNG to be delivered both on site and across rural areas of the district (C580)

Allowing offsite means people will have to travel to take advantage of it if provided miles away (C543)

Allowing it to be provided offsite just becomes a tick box exercise and biodiversity suffers (C542)

Support 10% BNG in accordance with national policy (E1223)

No offsetting for individual development (E1221)

Likely to be conflict between BNG on site and the carbon neutrality overarching objective (C580)

AGREE: BNG can be provided off site.

(5 respondents) Need to be sure that this does not take away or undermine the incentive for developers to provide on-site. Also allocation should not be reliant on off-site mitigation from new development, but be a separate provision. New development can be self-sufficient with the use of brownfield sites (C352, E1218, E1228, E1216, E1228)

(3 respondents) If offsite mitigation is to be used, work on building up areas/enhancing areas for wildlife and biodiversity would be needed well in advance of any destruction of an area / payment in advance (C149, C542, E1237)

(2 respondents) Would allow for a flexible approach to be taken (E1069, C597)

(2 respondents) Will allow for small sites to be developed where not possible to provide BNG on site / Will allow developments that are acceptable in all other ways to be brought forward (C597, E1233, E1223)

Probably only acceptable for small sites, large should provide it onsite (E1233)

On site will lead to lower density which is at odds with aim of maximizing development around existing transport hubs (C580)

Question 1b: Do you agree or disagree with the following biodiversity and natural environment statements? - We should allocate land specifically for open space or for biodiversity net gain, to provide opportunities for off-site mitigation of the effects of new development.

Option	Citizenspace	Emails	Have Your Say Polls	Total	Percent
Strongly agree	110	E1228 E1237 E1242		113	30%
Agree	99	E1072 E1218 E1221, E1123, E1128, E1179		110	30%

		E1182 E1216 E1219 E1221 E1223			
Neither agree nor disagree	45	E1223 E1230 E1233		48	13%
Disagree	36		H99	37	10%
Strongly disagree	63	E1230 E1233		65	17%
Totals	353	19	1	373	100%

Question 1b Summary of responses and comments received.

A total of 373 people responded to this question with around 60% strongly agreeing and agreeing with the statement that we should allocate land specifically for open space or for biodiversity net gain, to provide opportunities for off-site mitigation of the effects of new development, around 27% said that they strongly disagreed or disagreed with this statement and around 13% of respondents didn't agree or disagree. It would appear therefore that the majority of respondents to this question do agree that land should be specifically allocated for open space or BNG. Natural England who is a statutory consultee also welcomes that the Council is seeking to allocate land through the local plan process to strategically address the impact of nutrients from new development on the River Itchen SAC and Solent marine designated sites, which are currently showing levels of eutrophication with consequential effects on protected species and habitats.

Reasons given for agreeing with this statement.

Although agreeing with the statement respondents were clear that this should be a last resort. It was also commented that some flexibility needs to be retained with options to offset on other land as well as sites allocated for the purpose. It is considered that more multi functional green space is needed.

Reasons given for disagreeing with this statement.

Having the potential to offset will weaken the case for trying to get developers to provide BNG on site. If you concede the principle of offsetting BNG you have lost the argument for providing in on site.

Comments provided in relation to Q1b:

Agree: allocate land for BNG / open space / offsetting / mitigation

This should be a last resort (E1182, E1218, E1221)

Agree (E1072, C541)

But need flexibility not just have to use allocated sites (E1216)

Could also change farming methods less inputs and pesticides (C580)

Do need more multi functional green space (E1218)

Disagree: allocate land for BNG / open space / offsetting / mitigation

Strongly disagree: For developments where it really is impossible to put in biodiversity net gain on-site, then it would be useful to have a well thought out area local to the development which will deliver the maximum gain. However, if land is specifically allocated for off-site mitigation, it will be difficult to resist developers insisting that biodiversity net gain cannot be provided on-site, as WCC have already conceded the principle and it is only about the quantity (C291).

Loss of Biodiversity most pressing issue of our time and must be central to local plan (H99)

How will this all fit with EU single farm payment to DEFRA for funding of sustainable land management (C580)

Need to be careful this doesn't inflate price / value of land allocated for offsetting and make it unviable (E1223)

It will weaken the case for providing it on site (E1230)

Will reduce development gain for landowners so not fair (E1233)

Slido poll result from live events:

How successful have the council been in balancing protecting the countryside with the need for development? Mean average score across the 4 live events out of 10: 5.725

2: Question 2: Do you agree or disagree with the following statement? Current development management policies for the protection of the countryside are adequate.

Do you agree or disagree with the following statement? Current development management policies for the protection of the countryside are adequate.

Option	Citizenspace	Letters	Emails	Have Your Say Polls	Social Media	Total	Percent
Strongly agree	11					11	2%
Agree	29		E1123, E1219			31	7%
Neither agree nor disagree	56		E263, E271, E1199, E1245, E1228, E1242	H9, H24, H49, H108	M38	67	14%
Disagree	77	L12, L13 L30	E1221, E990, E288, E1182 E1218 E1221 E1230 E1232 E1237 C580	H12, H55, H59, H61, H72, H91, H93, H98, H99, H102, H109, H116, H124, H128		104	22%
Strongly disagree	248	L29,	E186, E1230 E1233		M6, M11	254	55%

Totals	421	4	21	18	3	467	100%
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Question 2 Summary of responses and comments received.

A total of 467 people responded to this question with around 9% strongly agreeing or agreeing with the statement that current development management policies for the protection of the countryside are adequate. Around 77% said that they strongly disagreed or disagreed that the current development management policies for the protection of the countryside are adequate. Around 14% of respondents didn't agree or disagree. It would appear therefore that the majority of respondents to this question do not agree that the current development management policies for the protection of the countryside are adequate.

Reasons given for disagreeing with this statement:

The main reason for disagreeing with the statement was that respondents considered that the current policies have allowed for too much greenfield and countryside development with the resulting loss of habitats and conversely that the policies had not achieved sufficient brownfield development. The second most popular view was that the gap policies in particular had not protected the gaps between settlements. It was also considered that the planning system is developer driven and that they can "get around" the policies. Several respondents commented that the policies need to be stronger and more robust so that they stand up at appeal. They also need to be properly enforced and not discretionary. There was a feeling that developers "get away" with damaging biodiversity and not providing properly sustainable development with the right infrastructure. Some sites have been overdeveloped with damage to environmentally sensitive areas. There are too many proposals for development of new towns on greenfield sites and development of farmland and golf courses. There were also many responses mentioning specific sites which were either developed or being promoted for development contrary to the countryside policies in the local plan. They are listed below.

Reasons given for agreeing with this statement:

Those who thought that the current policies for protection of the countryside are adequate did so on the basis that they thought that they had protected sites and impacts of development on the rural area but still allowed development to meet needs. There was also a comment that although on paper the policies are good they are often overridden in the interests of development.

Agree that the current development management policies for the protection of the countryside are adequate:

- MTRA4 has been successful in protecting district's countryside / protected sites and impacts of development on the rural area whilst planning growth to meet development requirements (C293, C515, C597)
- Policies are good but are often overridden in the interests of development (C385, C573)

Current development management policies for the protection of the countryside are inadequate for the following reasons:

They have allowed for inappropriate types of development to be built:

- (36 respondents 2 of which did not want their comments published) They have allowed for too much Greenfield / countryside development with loss of habitats (C99, C187, C199, C202, C211, C218, C232, C234, C257, C267, C281, C308, C318, C326, C331, C334, C339, C342, C346, C363, C382, C404, C409, C426, C489, C507, C511, C542, C573, M6, E1182, E1230, E1232, C580)
- (18 respondents) Current gap policies inadequate/ protect important settlement gaps (C119, C125, C160, C168, C226, C227, C231, C277, C306, C327, C347, C429, C464, C464, C573, C588, C589, E1233)
- (17 respondents) The policies have not achieved sufficient brownfield development / encourage brownfield development / brownfield first (C138, C218, C257, C308, C334, C342, C346, C376, C404, C409, C426, C428, C489, C511, C573, E288, E1232)
- (15 respondents) Developers eventually get past current policies to protect the countryside/planning system is developer-driven (C9, C33, C63, C79, C95, C101, C114, C118, C133, C150, C157, C214, C282, C285, E1230)
- (12 respondents 1 of which did not want their comment published) Need stronger/ more robust policies that inspectors can uphold at appeal (C372, C399, C404, C407, C421, C567, C568, C577, C603, E1230, E1237)
- (11 respondents) Existing policies don't protect the countryside / open spaces / too discretionary / not well enough enforced (C467, C516, C532, C561, C562, C567, C573, C580, C584, E1221, E1233)
- (8 respondents 1 of who did not want their comment published) Developers damage biodiversity and provide little consideration for drainage (damaging rivers with sewage) or flood risk/try to get away with minimum requirements (C17, C283, C314, C327, C398, C441, C452)
- (8 respondents 1 of who did not want their comments published) Planning policy enforcement is too weak (C93, C101, C186, C198, C208, C282, C305)

- (8 respondents) CP18 has been ignored in certain circumstances / needs to be stronger / important to keep settlement gaps (C333, C392, C404, C487, C488, C497, C561, C569)
- (7 respondents) Existing policies have not prevented risk of over-development in environmentally sensitive areas and ecologically diverse greenfield sites (such as downland to north of Winchester) (C3, C78, C79, C162, C217, C235, C573)
- (7 respondents) Existing policies not effective in protecting the countryside (C358, C372, C488, C494, C495, C510, E1233)
- (5 respondents) Large new developments are devastating for local environment and transport (C317, C318, C404, L30, H124)
- (4 respondents) No evidence of desire to protect countryside (C463, C579, C580, M11)
- (4 respondents) Policies are currently unclear and open to interpretation/have loop holes (C144, C186, C278, E1221)
- (3 respondents) New homes being permitted on plots that are too small/dense e.g. Oliver's Battery, Hursley, and Compton (C170, C286, C567)
- (3 respondents) Insufficient recognition of the length of time it has taken for much countryside habitat to reach its current composition, and the consequent short-term irreplaceability of established habitat once it has been destroyed / too much destruction of habitat allowed – (C236, C314, C344)
- (3 respondents) Proposals for new towns and settlements in green field sites/farmland and golf course (C164, C174, C379)
- (3 respondents) Existing policies don't protect countryside (C417, C420, E1233)
- (3 respondents) Decline in wildlife populations (C296, C301, C585)
- (2 respondents) Conversion of barns should be covered by same considerations as dwellings (C352, C439)
- (2 respondents) Policies fail to promote biodiversity / don't meet targets (C223, C418)
- (2 respondents 1 of who did not want their comment to be published) Don't fully recognize the irreplaceability of established habitat and the true environmental cost of development on the countryside (C428)
- (2 respondents) Developments starting without permission, with corrective actions being taken after damage already done or being given retrospective permission (C263, C295)
- (2 respondents) Development should only be approved if it takes account of flora and fauna (C376, C591)
- (2 respondents 1 of who did not want their comments published) Developers should not be allowed to cut down trees / remove hedges (C453)

- (2 respondents) Countryside and species in our countryside are as important as SDNP / more important since lockdown (C395, C496)
- (2 respondents) Frequently VDS and conservation appraisals are ignored (C144, E1221)
- (2 respondents) Constant speculative applications for housing on green field sites, golf courses and HCC farmland (C478, C481)

Single respondents:

- Impact of building on SSSIs is not considered (not shown on building plan maps) (C274)
- Provision for excessive numbers of housing (C290)
- Too many trees lost and not replaced (C416)
- Local value of countryside, footpaths etc not properly recognized in the local plan (C573)
- Developments do not include requisite infrastructure development (C125)
- Developments not completed on schedule so countryside destroyed to prepare for useage but stands idle (C177)
- Developers overdevelop for profit (C441)
- Applications can be misleading and there is no penalty for this (C445)
- SHELAA submissions are misleading / inaccurate with no redress (C445)
- Don't build on gardens (C453)
- Some current policies are contradictory (e.g MTRA 3 allows infilling of sites because there is no local plan while MTRA4 prevents infilling of sites because there is a local plan) (C121)
- Distrust in Council, potential for monetary negotiations to allow countryside development (C40)
- Too many landowners have learnt that they can ignore Planning rules and use land for industrial and storage purposes, or even for residences (C305)
- Seeing developments where biodiversity is being reduced (C197)
- Provision of recreational land has significantly reduced over time (C216)
- Too many developments allowed with no regard to biodiversity (C398)
- Need stronger proactive powers to prevent inappropriate development in the countryside don't let it be developer led (C493)
- Don't allow developments larger than 100 houses (C498)

- Too much housing being built (C475)
- Pressure on facilities / more people accessing footpaths and countryside / too many people loss of tranquility (C488)
- Small scale developments better for ecology (C478)
- Planning approval granted in rural areas against wishes of local people (C300)
- People live in the area because of the countryside (C364)
- Current policies lack expert input from knowledgeable wildlife organisations and individuals (C294)
- Council should use powers to develop brownfield land (C511)
- Infill should be encouraged (C347)
- People often don't know about applications (C489)
- Need better enforcement of policies (C580)
- Local opinion ignored (C584)
- Reference to specific development sites:
- (30 respondents 2 of which didn't want their comments published) Texas Drive development (17/02190/FUL) / Olivers Battery (C192, C226, C227, C231, C291, C292, C325, C326, C347, C361, C363, C372, C382, C399, C407, C408, C421, C425, C432, C461, C471, C497, C568, C569, C577, C603, E1176, E1230)
- (27 respondents 1 of who did not want their comments published) Royaldown proposals (C19, C59, C100, C114, C249, C272, C287, C314, C388, C397, C406, C409, C488, C497, H116, H124, E288, E605, E677, E685, E694, E774, E827, C403, E1030, C497)
- (18 respondents 1 of who did not want their comment published) Barton Farm development (C33, C61, C100, C114, C193, C310, C313, C336, C388, C394, C452, C507, C573, C597, E990, E574, E1030)
- (9 respondents) Micheldever new town proposals (C59, C70, C129, C379, C425, C338, C598, L13, L30)
- (5 respondents) South Winchester Golf Course proposals (C233, C339, C397, C233, C242)
- (3 respondents) Olivers Battery, Pitt, Hursley and Compton (C339, C394, C489)
- (3 respondents) Fields around Winchester becoming filled with houses / south of Winchester (C124, C573, E990)

- (3 respondents) Businesses have set up that should be sited in industrial/commercial areas / use vacant industrial sites not countryside: minerals recycling, timber storage and distribution (Shedfield), aggregate storage and distribution (Knowle), retail park (Shedfield) (C277, C386, C489)
- (2 respondents) South Winchester Village (C573, E1232)
- (2 respondents) Rural areas of the Southern Parishes have been overdeveloped with mobile homes which are unsustainable in their locations, construction and running costs: (eg Boarhunt, Durley, Swanmore, Shedfield, Knowle) (C277, C386)
- (2 respondents) Take note of One Great Win and WCC vision states that green areas should be protected and housing on brownfield sites such as Bushfield Camp, Town centre sites, Riverpark Leisure Centre site (C478, C481)
- Gladman development proposals Otterbourne (C554)
- Recent housing developments in South of District/along M27 corridor reducing quality of life and countryside (C42)

Question 2b: Please explain your view on what new policy measures should be adopted:

Summary of responses and comments received.

Most of the respondents to this question considered that a green belt policy was needed to restrict the threat of development spread. It was also considered that Local Green Spaces should be identified, allocated and protected. Need to recognise the importance of landscape character and valued landscapes and the links to good health and wellbeing. There was emphasis on a brownfield first development strategy with no or restricted development on any green field sites. Policy should require all new developments to have open space and biodiversity included in them. Consideration needs to be given to more than planting, there are many other aspects such as hedgehog holes, bird and bat boxes, pond, bogs, roof gardens and more that need to be taken on board. Agricultural land should be preserved for food production. There was a suggestion that a policy is needed for MOD sites in the countryside. Environmental cost and impact should be the decider not economic considerations. Do something about permitted development in the countryside that can damage biodiversity. A Nature Recovery Network policy was suggested.

All of the existing policies need to be updated in any case to reflect the new NPPF and the new local plan should be landscape led. There were many more suggestions of actions which could be included within policies as well as specific proposals for areas that should be allocated as Local Green Space and these are set out in summary below.

Suggested new policy measures:

- (251 respondents 3 of which did not want their comments published) Implement green belt policy / restrict threat of development spread – (C19, C42, C63, C66, C97, C101, C103, C104, C110, C111, C112, C118, C120, C124, C126, C131, C133, C141, C147, C148, C151, C152, C155, C156, C161, C166, C167, C172, C174, C182, C193, C195, C215, C217, C220, C232, C237, C239, C240, C242, C248, C254, C282, C291, C292, C304, H109, C19, E85, E95, E97, E102, E105, E110, E119, E165, E167, E187, C35, E216, E228, E240, E242, E248, E249, E254, E278, C162, E282, E286, E292, E299, E311, E322, E330, E333, E335, E344, E368, E389, E399, E454, E499, E528, E546, E563, E577, E583, E595, E605, E619, E649, E658, E685, E694, E702, E705, E727, E733, E736, E741, E745, E774, E827, C403, E859, C588, E877, C461, E882, E886, E887, E888, E889, E890, E892, E893, E895, C364, E897, E898, E900, E901, E902, E907, E909, E910, E911, E912, E913, E914, E915, E916, E917, E919, E923, E925, E926, E927, E928, E929, E930, E931, E938, E939, E942, C233, E944, E946, E947, E950, E953, E955, E956, E961, E964, E966, C140, E969, E970, E971, E973, E974, E976, E977, E978, E979, E980, E983, E986, E987, E992, E993, E995, E996, E999, E1001, E1002, E1003, E1004, E1006, E1007, E1010, E1013, E1016, E1017, E1022, E1023, E1025, E1029, E1030, E1031, E1033, E1034, E1042, E1043, E1044, E1048, E1052, E1059, E1061, E1063, E1073, E1075, E1076, E1086, E1087, E1091, E1093, E1094, E1096, C534, E1109, E1112, E1117, E1122, E1125, E1135, E1136, E1140, E1141, E1145, E1146, E1150, E1153, E1154, E1155, E1157, E1159, C579, E1166, E1169, E1173, E1176, E1178, C497, E1181, E1186, E1188, E1189, E1191, E1193, E1194, E1200, E1202, E1205, E1206, C352)
- (32 respondents 2 of which did not want their comments published) Local Green Spaces should be identified, allocated and protected/ recognize importance of landscape character and valued landscapes / good for health and wellbeing / wildlife / gaps (C331, C334, C347, C353, C361, C372, C392, C399, C404, C407, C421, C429, C461, C471, C481, C487, C407, C567, C568, C569, C573, C577, C412, C588, C603, M38, E1209, E1218, E1230, C580)
- (19 respondents 1 of who did not want their comments published) Use of brownfield development should be prioritized before developing greenfield sites – (C17, C36, C87, C164, C199, C217, C232, C236, C248, C267, C310, L12, L13, H12, E990, H109, H116, H124)
- (19 respondents) Identify priority areas of countryside and direct development elsewhere/Allocate local green spaces, recognising the importance of real gaps between settlements, protect local green spaces, landscape character, local

distinctiveness and Valued Landscapes – (C63, C79, C119, C192, C226, C227, C231, C253, C255, C262, C291, C292, C304, C326, C339, C361, C548, C580, E1244)

- (10 respondents 1 of who did not want their comment published) Future developments should only develop brown or grey areas / do not build on green field sites – (C32, C59, C117, C146, C164, C187, C193, C211, C272)
- (9 respondents 1 of who did not want their comment published) Ensure all developments have green space / biodiversity factored into plans (C88, C286, C543, M38, H59, H72, H91, E1237)
- (8 respondents) No more greenfield developments / recind existing green field permissions without compensation / don't build over the countryside (C529, C555, H12, H55, H93, H98, H109, H116)
- (8 respondents) Planting is not enough read - Putting a few plants in the ground is not enough. Read 'Wilding' by Isabella Tree or 'The Garden Jungle' by Dave Goulson to get an idea of how far we need development policies to go in order to get anywhere close to what we should be doing in terms of acquiring a biodiversity net gain. Minimum numbers of different species of plants should be planted. Peat compost prohibited. Little mini biodiversity hubs should be set up throughout a whole development. Fruit trees could be grown everywhere so that people benefit but also wildlife Only UK-specific plants planted. Lots of species-specific criteria such as hedgehog holes in fencing between houses or bird boxes up every tree, ponds, bogs, better farming practices, reduce farm animals, reduce hard surfacing, roof gardens, edible landscaping, rewilding, allotments, carbon capture and community gardens. (C321, C343, C365, C516, C352, C535, C580, H109)
- (6 respondents) Positive actions need to be taken to encourage wildlife and link natural areas together e.g. routes for animals/wildlife corridors, insect/bird/bat boxes, reduce night lighting, swift brick per house (C7, C11, C36, C118, C127, C294)
- (6 respondents 1 of who did not want their comment published) Preservation of areas of food production/promote sustainable agriculture (C57, C241, C252, C274, C304)
- (4 respondents) Small developments with houses that enhance countryside e.g. enhance viability of rural communities (C61, C63, C267, C310)
- (4 respondents) Retain strategic settlement green gaps (C175, C198, C202, C248)
- (4 respondents) Increase planning enforcement action (C103, C278, C283, C516)
- (3 respondents 1 of who did not want their comment published) New developments should have many trees, hedges, water features, and wild gardens, bug hotels, compost bins, beetle mounds, swift and bat boxes as well as parks for playing in. Hard landscaping should be minimal (C127, C585)

- (3 respondents) Policy needed to protect settlements from landowners putting forward land for development solely for financial gain (C5, C87, C216)
- (3 respondents) Stronger policy measures to prevent powerful individuals/organisations having stronger influence (C48, C157, C192)
- (3 respondents) Redevelop city centre with more homes and better green transport links to create cohesive communities (C75, C87, C232)
- (3 respondents) If development outside the major urban centres is essential, it would be better to concentrate development in larger zones such as Barton Farm, North Whiteley and West of Waterlooville which can be planned in an integrated way (C160, C164, C168)
- (3 respondents) Major reductions in farming emissions, and reductions in emissions from farm animals / advice to farmers, growers and land managers / encourage sustainable farming (C343, C534, C549)
- (2 respondents) Need a specific policy for MOD sites in the countryside (E1070, E1092)
- (2 respondents) Well-designed housing with wildlife connectivity build in can be more beneficial than fields (C591, C598)
- (2 respondents) Areas which were previously “special landscape quality” should be designated as “valued landscapes” (C580, E1209)
- (2 respondents) Stop destroying nature / work with nature (C355, H116)
- (2 respondents) Need analysis of potential for settlement coalescence and policy to avoid it (C429, E1209)
- (2 respondents) Don’t build on open spaces (C556, C560)
- 2 Policy measures should be flipped and established around environmental cost and impact first, not GDP (C252, C296)
- (2 respondents) Use more sustainable methods in new developments such as rain water harvesting, solar and wind power (C501, C516)
- (2 respondents) Clear definitions for policy (C144, C273)
- (2 respondents) Maintain rigour in the planning process with consistent approach (C264, C296)
- (2 respondents 1 of who did not want their comment published) Extensive consultation and resulting support from communities when developing villages outside of current boundaries (C244)
- (2 respondents) Policy should reflect local resident wishes (C101, C285)

- (2 respondents) WCC should lobby central government to amend national planning policy to prevent biodiversity destruction through change of use and PD rights in rural areas and give rural communities more say in local development. (C243, C244)
- (2 respondents) A rapid increase in rewilding, ponds and bogs, and wildlife corridors (C343, C595)

Single responses:

- Support “intention to identify, enhance and protect networks of interconnected habitats to benefit biodiversity in the long term” but unclear how this will be translated into proposed policy (E1203)
- strongly recommend that the council commits to the creation and maintenance of a functioning Nature Recovery Network (E1203)
- Identify areas within the local plan area that are of special importance within the context of the Nature Recovery Network, including: existing habitats that are of highest value, areas that buffer existing core habitat, and gaps within the existing ecological network that, if filled, would improve ecological connectivity and reduce fragmentation (E1203)
- Assess, identify and prioritise opportunities for ecological enhancement through local plans and strategies (E1203)
- Identify the best sites for development and those areas where development should be avoided. Sites of core importance to the Nature Recovery Network should be protected and development should not result in severance of ecological connectivity within the network (E1203)
- Inform the design of any development in such a way that it makes a net contribution to the Nature Recovery Network (E1203)
- Inform and target biodiversity net gain delivery and other nature-based solutions (E1203)
- Inform the use of building standards that promote biodiverse developments within local plans (e.g., Building with Nature standards) to ensure that development targets action to most effectively contribute to restoring nature (E1203)
- Send a clear market signal to developers of your expectations for all future planning to contribute positively and meaningfully to nature’s recovery (E1203)
- Old policies need to be updated to reflect NPPF (C588)
- Need a landscape led approach to development in the new local plan (E1244)
- Policies should ensure preservation of tranquility and intrinsic dark landscape (E1244)
- CP20 is too weak in terms of landscape protection and should come earlier in the plan (E1244)

- No large events until impact on biodiversity and natural environment is known (E1245)
- Policies should align with SDNP and other neighbours (E1245)
- Chalk stream conservation and flooding important to Cheriton (E1245)
- Take account of Winchester and its setting (E1199)
- Specifically allocate land for open space (E1221)
- Use Buffer zones to protect nature important sites from domestic animal disturbance (C591)
- Build flats with large communal gardens (C346)
- Farming must improve, less pesticides, improve biodiversity, take land out of agriculture for wildlife corridors (C580)
- DEFRA subsidies need to be examined (C580)
- If going for more than 10% BNG then will need to be viability tested (E1060)
- Policy should ensure developers implement mitigation for any damage for each building built e.g. green infrastructure (C33)
- NPPF requires policies that contribute to and enhance the natural and local environment and valued landscapes (C548)
- Protect hedgerows (C350)
- Don't use old agricultural buildings for employment, people will have to drive there (C586)
- Good development standards / practice is an absolute (C539)
- Take advice from ecologists not economists (C385)
- Support traditional methods of land management (C542)
- Analogous policies exist in the management of waterways and flood prevention (C542)
- Protect flood plains / don't build on them (C390)
- Protect the Itchen / stop water pollution (C574)
- New infrastructure should take into account local opinion, traditional land and path use (C390)
- Planting and mitigation should be in place before the development (C452)
- Manage areas of woodland, scrub, grassland, and rivers in a 'wilder' way (C11)
- Protect chalk streams and local rivers from extraction and pollution, including storming (C29)
- Large scale tree planting needed urgently (C252)
- SSSI's need better protection and care (C118)
- More green space in the city (H116)

- 2 mile perimeter around built up areas should be enforced for biodiversity, aesthetics and recreation (C424)
- Don't sell open space such as Badger Farm (H102)
- Protect hedgerows (H98)
- Fauna and flora must be protected (H9)
- Support the idea of asking for green sites (C559)
- Stronger requirements for indigenous planting for agriculture and for house developments (C244)
- Make bigger gardens / help flooding / avoid paving over small gardens/ allow for planting vegetables / mindful spaces (C437)
- Increased protection needed for areas of great visual and landscape value (C337)
- Stronger policies on appropriate fencing and landscaping (C244)
- Stronger policies on light pollution (C244)
- Cumulative effect of land use should be a strong consideration (C244)
- Carbon neutrality targets will not be achieved without massive boost to biodiversity and the natural environment (C365)
- Sustainability must not be a reason to consider inappropriate major developments in rural areas (C81)
- If land deemed inappropriate for development, the decision should be maintained and not subjected to repeated reviews (C95)
- Regenerate inner city housing (H109)
- Building in the countryside last resort only (C335)
- Protect agricultural land for edible and energy generating crops (C469)
- Allocate sites for industrial/commercial uses and not permit these developments outside of allocated areas (C277)
- Need a strategic landscape policy (quote New Forest District Local Plan as good example)(E1244)
- Need to identify and protect tranquil areas (E1244)
- Limit light pollution (E1244)
- Need policies for equestrian and leisure development to avoid negative impacts on landscape and reuse existing buildings where possible (E1244)
- SDNP has relevant policies SD4, SD5, SD6, SD7 & SD8. (E1244)
- CP19 will no longer apply but new plan will need a policy which confirms the legal obligation on WCC to have regard to the national park purposes (E1244)

- Ecosystem services and natural capital policy required should align with SDNP policy SD2 (E1244)
- Plan should clearly state how the authority will assess and weigh natural capital consistently against increasing population pressures (E1244)
- Great weight should be given to the natural capital value of soil quality in deciding where to put development (E1244)
- Stronger policies needed to protect the landscape setting of Winchester (C462)
- Road plans and building plans should display current land use in background to show what is being changed (C274)
- Stronger pre-planning consultation with public and wildlife organisations such as HIWWT (C301)
- Ensure environmental impact of building is properly mitigated (H24)
- Plan should take a long term view to enhance and protect area (including population predictions of falling UK population) – (C256)
- Protect grades 1 and 2 land for growing and commercial sustainable agriculture (C535)
- Stop building new roads or anything (C436)
- Plant trees (H109)
- A rapid increase in zero-carbon energy production to balance energy use (C343)
- Widespread introduction of negative-carbon farming methods such as ‘no dig’ growing and fruiting trees (C343)
- Reduction in farm-based pollution and toxic run-off. (C343)
- Less focus on planning and more on natural systems (E835)
- Don’t need new policies just make sure the strategic gap policies are properly enforced E1233)

Response relating to question itself:

Monitoring reports should be provided (C291, C292, C361, C372, C399, C567, C568, C569, C577, C603, E1230)

More detail about policies should be provided (C111, C198)

Loaded question (C189, C191)

Proposal for specific designations of Local Green Space and comments on specific proposals.

444 supports for land at 'Five Oaks Farm', Shedfield, to be designated as a Local Green Space because of its beauty, historic significance, recreational value, tranquility and rich wildlife and is important settlement gap to the communities of Shedfield Parish.

L15, L16, L19, L21, L22, L23, L24, L26, L31, L32, L33, L34, L35, L36, L37, L38, L39, L40, L43, L44, L45, L46, E350, E1, E2, E3, E4, E5, E6, E7, E8, E9, E10, E11, E12, E13, E15, E17, E19, C67, E22, E32, E33, E34, E35, E36, E103, E114, E116, E145, E162, E166, E198, E209, E215, E237, E274, E296, E298, E300, E301, E302, E305, E306, E307, E308, E310, E313, E315, E316, E317, E318, E319, E323, E325, E326, E327, E328, E329, E334, E336, E337, E338, E339, E340, E345, E346, E347, E348, E349, E351, E352, E353, L15, L16, L19, L21, L22, L23, L24, L26, L31, L32, L33, L34, L35, L36, L37, L38, L39, L40, L43, L44, L45, L46, E350, E1, E2, E3, E4, E5, E6, E7, E8, E9, E10, E11, E12, E13, E15, E17, E19, C67, E22, E32, E33, E34, E35, E36, E103, E114, E116, E145, E162, E166, E198, E209, E215, E237, E274, E296, E298, E300, E301, E302, E305, E306, E307, E308, E310, E313, E315, E316, E317, E318, E319, E323, E325, E326, E327, E328, E329, E334, E336, E337, E338, E339, E340, E345, E346, E347, E348, E349, E351, E352, E353, E355, E356, E357, E358, E359, E360, E361, E362, E363, E364, E365, E366, E367, E369, E370, E371, E374, E375, E376, E377, E378, E379, E380, E381, E382, E383, E384, E385, E386, E387, E388, E390, E391, E392, E393, E394, E396, E397, E398, E400, E401, E402, E403, E404, E405, E406, E407, E408, E409, E410, E411, E412, E413, E414, E415, E416, E417, E418, E419, E420, E421, E422, E423, E424, E425, E426, E427, E428, E429, E430, E431, E432, E433, E434, E435, E436, E437, E438, E439, C213, E441, E442, E443, E444, E446, E447, E448, E449, E450, E451, E452, E453, E455, E456, E457, E458, E459, E460, E461, E462, E463, E464, E465, E466, E467, E468, E470, E471, E472, E473, E474, E475, E476, E477, E478, E480, E481, E482, E484, E486, E488, E489, E490, E491, E492, E494, E495, E496, E497, E498, E500, E501, E502, E508, E509, E511, E512, E513, E515, C27, E518, C42, E520, E521, E522, E523, E524, E525, E526, E527, E529, E530, E531, E533, E534, E535, E537, E538, E539, E540, E541, E544, E545, E548, E550, E552, E553, E555, E558, E559, E562, E564, E565, E568, E569, E576, E579, E580, E581, E582, E584, E585, E587, E588, E589, E591, E592, E596, E598, E599, E600, E602, E603, C266, E607, E608, E609, E610, E611, E613, E616, E620, E624, E626, E628, E632, E633, C589, E637, E638, E640, E641, E642, E643, E646, E650, E651, E652, E655, E656, E662, E666, E667, E669, E671, E673, E680, E681, E682, E691, E693, E695, E704, E710, E711, E714, E717, E724, E725, E726, E731, E734, E735, E740, E746, E747, E748, E750, E751, E752, E753, E754, E755, C230, E757, E758, E760, E761, E762, E765, E766, E767, E768, E769, E770, E773, E776, E777, E778, E779, E780, E781, E782, C213, E787, E788, E790, E791, E793, E796, E798, E799, E807, E810, E814, E816, E819, E821, E823, E826, E828, E830, E832, E834, E836, E839, E844, E853, E854, E855, E862, E863, E864, E868, E873, E874, E876, E879, E883, E899, E918, E935, E940, E948, E975, E984, E988, E991, E1011, E1012, E1018, E1036, E1037, E1038, E1041, E1047, E1049, E1050, E1067, E1081, E1089, E1090, E1098, E1101, E1103, C200, E1115, E1126, E1127, E829, E1168, E1170, E1175, E1190, E1247, E1248, E1249, E1250, E1251, E1252, C175, C200

(5 respondents) Proposal for Local Green Space to be designated between Swanmore and Waltham Chase villages along Lower Chase Road (E582, E829, E924, E899, E952, E985)

(3 respondents) Proposed Local Green Space between Wickham and Knowle and Fareham (E662, E1054, C200)

Proposal for land at Flowerdown MoD estate to be protected (H37)

Proposal for land surrounding Shirrell Heath to be designated as Local Green Space (E198),

Comments relating to individual sites promoting / questioning BNG credentials.

(17 respondents) Objections to Micheldever New Town due to adverse impact on environment, biodiversity, protected species and irreplaceable natural asset including gap between Winchester and Basingstoke. (E186, E192, E195, E196, E197, E199, E217, E222, E226, E229, E247, E257, E272, E293, E618, E647, E920).

(2 respondents) Against housing development on the site of South Winchester Golf Course (H108, E282)

Crawley SHELAA sites would adversely impact on BNG (C474)

Land at Denmead (E1055)

Support for Shedfield Quarry application provided land is returned to pasture after extraction (E506)

Micheldever Station: building in nature, planting trees, protect existing landscape, significant BNG (E739)

Mill Lane Wickham: retention of trees and hedges, wildlife habitat proposed planting (E1005)

Land east of Down Farm Lane Headbourne Worthy: Green infrastructure and BNG as part of development proposals.

Rareridge Lane Bishops Waltham: (E1051),

Land at Brightlands Sutton Scotney: Increase ecological interest, BNG, nitrate neutral development (E1082)

Sir John Moore Barracks: brownfield development (E1092)

Land north of Abbott's Barton: increase ecological interest and BNG, offset for other development sites, nitrogen neutral (E1114)

South Winchester Golf Course: green infrastructure, BNG, access to open green space as part of development (E1116)

Land north of Winchester: green infrastructure, BNG, Nitrogen neutrality, green space (E1121)

Morgans Yard Waltham Chase: increase BNG, impact on viability and development costs (E1138)

Pitt Vale: BNG, nutrient neutral, open space, increase ecological interest, retain hedges and trees, new planting (E1149)

3: Question 3: Do you think a new Green Belt is needed in the south or north of the district?

Should not be considering Green Belt under biodiversity as it is a tool for controlling urban development and not a measure of biodiversity C540,

Option	Citizenspace	Letters	Emails	Have Your Say Polls	Social Media	Total	Percent
Yes	357	L6, L10, L12, L14, L17, L20, L49	E187, E1221, E156, E85, E293, E859, E1209, E1218 E1219, E1220 E1221, E1230, E1232, E1242, E1244	H29, H108,	M7, M9,	383	84%
No	70		W1123, E1123 E1162, E1216 E1225			75	16%
Totals	427	7	20	2	2	458	100%

Summary of responses and comments received.

A total of 458 people responded to this question with around 84% agreeing that a new green belt is needed in the north or the south of the district. Around 16% of respondents disagreed that a green belt designation is needed. Based on a 'yes/no' question, the majority of respondents to this question agree that a green belt designation is needed and then some commented on whether they felt it was needed in the north or the south and some had specific proposals which are summarised below. Natural England advises that work on establishing a Green Belt in the south of the district should ensure it considers the value of green belt land for the provision of multifunctional greenspace in close proximity to existing development. This should include opportunities for providing publicly accessible natural greenspace, enhanced wildlife value and ecological connectivity, reduced nutrient runoff including treatment wetlands and carbon sequestration.

Comments received supporting the allocation of a green belt.

The largest number of respondents considered that a green belt to the south of Hampshire should be allocated to provide the highest level of protection for the countryside. A smaller number supported greenbelt to the north of Winchester and several thought both north and south would be appropriate. Other respondents identified particular areas that they would like to see included within a green belt designation including between Winchester and Basingstoke, Eastleigh / Fareham / Havant, Winchester / Southampton, Denmead / West of Waterloo, Welbourne / Whiteley / Boorley Green, Bishops Waltham / Eastleigh and others which are listed below. One more strategic comment suggested a joined up approach with the green belt in Bedfordshire down to the south coast at Brighton.

Comments received against allocating a green belt.

Most respondents against allocating a green belt considered that the existing countryside and gap policies do this job provided they are properly enforced. It was also considered that designating a green belt would limit the amount of land available for development and risk pushing development into less sustainable areas and put additional pressure on the areas of land that are left as well as some unknown unintended consequences. Some questioned whether the National Park already performs the function of a green belt and if there would be room for a green belt between the PfSH area and the boundary of the SDNP. One respondent made the comment that designating a green belt could effectively price people out of the district by restricting housing land supply. A couple of respondents noted that a green belt designation would do little to deliver BNG, contribute to nature recovery or provide high quality green infrastructure because it is just a tool for controlling urban growth.

Support for green belt to south including around Winchester.

A Green Belt offers the highest level of protection and Test Valley BC now also support a **Green Belt south of Winchester / South Hampshire** including the settlements in Oliver's Battery, Compton and Hursley.

(172 respondents with 14 of them not wanting their comments published) (C588, C603, C577, C568, C569, C567, C562, C498, C497, C432, C429, C407, C404, C399, C403, C388, C377, C372, C363, C351, C351, C72, C93, C97, C98, C103, C104, C110, C111, C112, C118, C119, C120, C123, C126, C130, C131, C133, C141, C145, C147, C148, C151, C152, C155, C156, C165, C166, C167, C172, C174, C177, C180, C181, C182, C192, C193, C197, C198, C215, C220, C226, C228, C231, C235, C237, C239, C240, C241, C242, C247, C248, C253, C254, C255, C259, C261, C262, C263, C274, C285, C286, C291, C295, C292, C304, C306, C314, C327, C331, C332, C336, C338, C342, C347, C348, C352, C358, C360, C361, C363, C364, C372, C376, C388, C392, C393, C399, C401, C403, C407, C402, C407, C408, C409, C420, C430, C433, C435, C439, C441, C443, C445, C449, C461, C467, C470, C471, C473, C476, C487, C488, C491, C494, C496, C497, C510, C513, C518, C521, C531, C548, C552, C558, C567, C568, C569, C573, C577, C580, C596, C603, E859, E1209, E1218, E1230, C580, E1244,

Support for a green belt to the North of the district including Winchester

C351, C359, E1219,

Support Green Belt non specified location.

L12, C596, C580, C512, C510, C496, C494, C467, C409, C408, C401, C402, C393, C391, C361, C338, C325, C319, C84, C174, C256, C294, C318, C321, C346, C475, C517, C523, C562, E1220,

Support Green Belt to protect settlement gaps.

C517,

Support Green Belt in north and south

C202, C246, C249, C326, C339, C455, C489, E1221, E1232,

Support for specific areas in the green belt.

(17 respondents 2 of which did not want their comments published) To protect gap between Basingstoke and Winchester (C59, C70, C78, C79, C81, C127, C129, C164, C283, C355, C428, C455, C471, E1219, E1242)

(16 respondents 2 of which did not want their comments published) To keep separation between Havant/Eastleigh/Fareham (C305, C361, C372, C401, C402, C404, C407, C429, C511, C567, C568, C569, C603, E1230)

(12 respondents) To protect gap between Winchester and Southampton (C70, C79, C81, C99, C133, C136, C164, C192, C208, C375, C510, C511)

(5 respondents) Keep separation between Denmead and West of Waterlooville (C300, C455, C513, C561, E1244)

(4 respondents) Keep separation between Wickham / Winchester and Fareham (C208, C295, C305, E1230)

(3 respondents) To keep open areas north of Welbourne, Whiteley and Boorley Green (C208, C295, C305, E1244)

(2 respondents) To Keep separation between Bishops Waltham and Eastleigh (C208, E1244)

To join up with GB in Bedfordshire to the north Wilshire in the west and down to south coast at Brighton C3,

Waltham Chase, Shedfield, Wickham and, Curdridge, Durley and Botley / Upham and Fair Oak, Colden Common and Bishopstoke, Otterbourne and Chandlers Ford, Compton, Shawford, E1244,

Green belt should include land in Winchester, Test Valley, Eastleigh and Fareham E1244

Protect the gap between Chandlers Ford and Southampton H29,

Comments raising issues against / potential issues with Green Belt designation.

(7 respondents) Current policies / gap policies do the job if enforced properly (C309, C343, C516, C540, E1128, E1233, E1216)

(6 respondents) Will limit land available for housing (C533, C542, C577, E1123, E1225, C597)

(5 respondents) Risks pushing development further from established areas against stated objectives for sustainable location for development (C23, C58, C79, C564, C597)

(4 respondents) There are no exceptional circumstances (C170, C406, E1123, E1225)

(3 respondents) Question whether a green belt is needed (C556, E1162, E1242)

(3 respondents) It is not necessary (C186, E1072, E1233)

(3 respondents) GB can have unintended consequences (C593, E1182, E1228)

(3 respondents) Will put additional pressure for development on remaining undesignated areas (C440, C507, E1182)

(2 respondents) National Park already performs this function (C36, E1237)

(2 respondents) Is there room for GB between PfSH area and boundary of SDNP? (C277, C386)

2 respondents) How will GB stop erosion of the rural fringes? (C277, C386)

Must meet the 5 tests in the NPPF (C533),

Existing policies have allowed for encroachment in the countryside (C529)

SDNP and NFNP areas already reduce land available for housing (C593)

No need for small housing number (C315)

GB can result in barren non biodiverse areas (C516)

Consider extending national park to cover the area around Winchester instead (H29)

Not needed already got SDNP (E1216)

Green belt is only planning tool for controlling urban growth it doesn't deliver biodiversity gain, contribute to nature recovery or provide high quality green infrastructure (E1203),

Should focus instead on policies to join exiting habitats to create a functioning Nature Recovery Network (E1203)

Q3b If so, what changes in circumstances make this 'exceptional measure' necessary:

Comments received on what changes in circumstances make the exceptional measure of designating green belt necessary.

The majority of respondents said that they thought the change in circumstances that warranted designation of a green belt were concerned with the need to protect land from development, stop urban sprawl, protect gaps between settlements, protect the countryside from aggressive developers and retain agricultural land for food growing. The second highest stated reason was that green belts are needed to protect biodiversity and provide connectivity. The next most stated reason was to preserve the setting of Winchester and protect it from further development. A number of respondents noted that designation of a green belt would aid urban regeneration and encourage a brownfield first approach to development therefore making best and most efficient use of the land available. Another popular reason was that green belts are needed to protect green space and to protect the natural environment and countryside which has become all the more important after the covid pandemic. Others noted that protection of green space will be needed to help towards solving the climate crisis. Several respondents indicated that a green belt designation could help stop the formation of new towns in the countryside and take away the incentive for developers to keep promoting land for development in the countryside. A green belt is considered a way of improving air quality, avoid flooding, protect water quality and allow trees to be planted. There were other suggestions which are set out below.

(141 respondents of which 8 did not want their responses published) To protect land from development / urban sprawl / protect gaps / protection from aggressive developers/ keep it for food growing; (C5, C6, C17, C19, C22, C25, C27, C40, C42, C50, C61, C63, C66, C70, C75, C76, C87, C100, C103, C108, C111, C114, C122, C131, C138, C144, C149, C161, C175, C176, C183,

C187, C191, C192, C195, C198, C199, C211, C214, C218, C226, C229, C231, C232, C236, C243, C244, C252, C254, C280, C281, C282, C283, C285, C291, C292, C301, C304, C305, C313, C316, C321, C306, C319, C325, C333, C334, C335, C351, C361, C372, C379, C382, C385, C397, C399, C401, C402, C404, C407, C417, C414, C403, C429, C434, C439, C443, C472, C469, C449, C452, C455, C463, C471, C482, C481, C478, C488, C494, C497, C498, C501, C502, C510, C511, C513, C514, C518, C531, C537, C538, C543, C554, C55, C563, C579, C589, C593, C598, C603, E1221, H29, H90, E877, E1059, C394, C461, E1182, E1209, E1220, E1230, E1232, E1244)

(65 respondents of which 5 did not want their responses published) To enhance and protect biodiversity and provide connectivity (C3, C11, C130, C149, C199, C226, C231, C232, C241, C235, C253, C255, C258, C262, C263, C279, C294, C304, C308, C314, C331, C332, C338, C347, C348, C350, C360, C363, C379, C382, C392, C395, C402, C401, C408, C428, C430, C435, C437, C443, C461, C467, C470, C473, C476, C478, C481, C487, C488, C492, C496, C497, C549, C588, E859, E877, E1232, E1233, E1240, C580)

(52 respondents) To preserve the setting of Winchester C192, C193, C196, C234, C241, C244, C253, C254, C262, C275, C291, C292, C304, C310, C314, C327, C339, C342, C352, C358, C361, C372, C377, C382, C388, C393, C399, C404, C407, C412, C417, C434, C441, C442, C453, C462, C493, C513, C538, C548, C552, C554, C567, C568, C569, C570, C577, C596, C603, E1230, E1232, E1244,

(34 respondents) To encourage urban regeneration and brownfield first approach / efficient use of land C244, C236, C253, C258, C291, C292, C307, C313, C314, C345, C361, C372, C399, C404, C407, C412, C414, C428, C434, C448, C453, C482, C487, C513, C567, C568, C569, C603, H29, C50, E1221, E1230, E1232, E1244,

(26 respondents 2 of which did not want their comments published) Provide / protect green space for health, recreation, wellbeing, tourism (C149, C280, C283, C310, C382, C397, C401, C402, C430, C435, C444, C488, C486, C497, C513, C537, C539, C579, H108, E85, E877, E1230, C580, E1244)

(21 respondents 1 of which did not want their response published) Protect green space / countryside needed after Covid (C32, C33, C57, C95, C101, C104, C144, C263, C306, C307, C352, C382, C432, C435, C439, C444, C488, C497, C554, C560)

(18 respondents 1 of which did not want their comments published) Need to protect our special environment/ natural environment / countryside (C48, C125, C197, C218, C382, C475, C556, C567, C568, C569, C574, C576, E1182, E1219, E1221, E1232, E1244)

(18 respondents 3 of which did not want their comments published) To help climate crisis (C9, C125, C149, C198, C236, C326, C365, C394, C478, C481, C487, C497, C550, C588, E877)

(14 respondents) Existing green belt / green areas should be respected / protected (C58, C87, C146, C245, C252, C263, C272, C274, C279, C287, C329, C435, C444, C463)

(9 respondents) To stop new towns / development (C252, C264, C285, C286, C290, C319, C425, C464, E1219)

(6 respondents) To protect air quality (C263, C398, C463, C478, C481, E877)

(4 respondents) Need more green areas / protect green space / countryside (C124, C117, C216, C513)

(4 respondents) Local plan already contains strategic and local gaps which must be enforced / protected from development (C194, C343, C566, C593)

(4 respondents) Will take away the incentive for developers to keep promoting land (C425, C530, E1218, E1244)

(3 respondents) Winchester currently unprotected and surrounded by national park etc will put it under increased pressure for development (C3, C464, E1244)

(3 respondents) To achieve sustainability targets (C150, C258, C263)

(3 respondents) The protection of the countryside that seems to fall through the gaps of current protection policies / existing policies not strong enough (C278, C432, C429)

(2 respondents) Not possible to identify one area which justifies exceptional measure (C160, C168)

(2 respondents) To ensure that development is beneficial to society rather than developers (C217, C464)

(2 respondents) To protect history / heritage throughout district not just Winchester (C464, C493)

There is no strategic overview for development in South Hampshire since the Structure Plan, PFSH position papers are non examined and non statutory (E1244),

Would meet the 5 tests in the NPPF (E1244)

Green belt is the best way to protect the countryside and prevent sprawl and coalescence (E1244)

Assist in safeguarding the countryside from encroachment including NPPF valued landscapes (E1244)

Probably too late (C136)

To protect against flooding (C218)

To protect water quality (E877)

Create a buffer for the SDNP (E1244)

To allow trees to be planted (C274)

Whole of area should be designated as National Park (C252)

Inspector at LPP1 thought GB designation might be appropriate in the future (E1218)

Protect against rogue planning decisions (E1221)

Need comprehensive research and engagement to understand impact on the whole of south Hampshire especially for housing and economic growth. Continue to work with PfSH and statement of common ground (E1220)

Would be interested in how green belt would interact with SDNP (E1240)

Good for the local economy research has found that the countryside north of the urban centres of South Hampshire could generate almost £26 million a year in terms of health, wellbeing, economic and ecosystem benefits if protected by a green belt (E1244)

“Planning for a South Hampshire Green Belt” paper presented to PfSH as evidence to support the need for green belt (E1244)

Question 3c: How would a Green Belt designation contribute to achieving sustainable development in the district and adjoining areas?

Comments received on how a green belt designation would contribute to achieving sustainable development.

The majority of respondents identified that a green belt designation would force developers to build in a sustainable, brownfield first manner with urban regeneration focus and the landscape respected. It would help direct development to existing settlements. Several respondents considered that a green belt could lead to higher density mixed use developments with more imaginative housing solutions which could enhance a sense of community and result in sustainable development. Respondents also considered that it could protect green space and countryside close to communities which would be a benefit for health and wellbeing, maintain the attractiveness of the area as a place to live and work and increase the quality of life for residents. Several respondents made the point that the green belt needs to be sustainably managed for biodiversity, carbon capture, recreation in order to be successful. It is considered a green belt will stop speculative development proposals and stop large developments by restricting land. There were other reasons stated which are summarized below.

Comments received with reasons why a green belt would not contribute to achieving sustainable development.

The majority of these respondents thought that it could be counterproductive to sustainable development and something more radical is needed. It is considered unlikely that there will be enough brownfield sites to accommodate the housing need. Question whether it is needed as 40% of the district is already allocated as National Park.

(183 respondents) Would force developers to build in a sustainable / brownfield first / urban regeneration, limited and controlled manner and respect landscape (C3, C5, C25, C87, C97, C100, C98, C104, C110, C112, C114, C119, C120, C124, C126, C127, C128, C131, C133, C141, C144, C145, C147, C148, C151, C152, C155, C156, C162, C164, C166, C167, C172, C174, C180, C181, C182, C187, C193, C198, C211, C214, C215, C219, C220, C226, C227, C231, C232, C235, C237, C239, C240, C241, C242, C245, C248, C254, C255, C256, C261, C262, C263, C275, C279, C281, C283, C285, C286, C288, C244, C291, C292, C304, C306, C308, C310, C314, C319, C326, C327, C331, C338, C339, C342, C346, C347, C348, C351, C352, C358, C361, C363, C364, C375, C376, C377, C379, C382, C387, C388, C391, C392, C393, C399, C401, C402, C403, C404, C406, C407, C408, C409, C417, C420, C421, C425, C428, C429, C430, C432, C434, C437, C439, C441, C422, C445, C449, C453, C456, C461, C464, C467, C471, C475, C481, C486, C487, C488, C494, C496, C497, C498, C503, C510, C511, C513, C517, C533,

C537, C540, C543, C546, C558, C562, C567, C568, C569, C573, C577, C588, C596, C603, L6, E187, L10, L12, L17, L20, L51, L53, E1221, L49, E156, H19, C588, E320, E504, C342, E1092, E1221, E1230, E1232)

(29 respondents) It wouldn't / could be counterproductive to sustainable development / need something more radical (C23, C32, C36, C59, C293, C309, C315, C323, C341, C365, C381, C383, C386, C397, C398, C412, C413, C414, C483, C492, C500, C501, C507, C584, C593, C602, E1116, E1123, C597)

(26 respondents 3 of which didn't want their comments published) Would direct development to existing settlements / encourage infrastructure provision / use existing infrastructure (C2, C17, C75, C76, C79, C123, C129, C249, C252, C259, C304, C329, C334, C348, C425, C439, C449, C482, C529, C548, C554, E1218, E1232)

(14 respondents) Would enhance sense of community and sustainable compact / mixed use / high density developments / more imaginative housing solutions C11, C263, C283, C286, C292, C321, C346, C382, C436, C437, C452, C453, C515, C579,

(11 respondents) Protect green space / countryside / close to communities (C87, C101, C195, C202, C304, C394, C403, C406, C428, C453, C490)

(10 respondents) Less development and more space to exploit green initiatives / sustainable farming, sustainable forests, community farms, biodiversity projects (C28, C78, C241, C280, C282, C305, C343, C394, C478, C549)

(7 respondents) To avoid financial gain for sellers of greenfield sites / greedy developers (C99, C118, C149, C236, C408, C491, E287)

(6 respondents) Security against inappropriate developments / over development / no development (C66, C81, C95, C103, C116, C394)

(6 respondents) Maintain attractiveness of place to live and work / quality of life for residents (C360, C448, C521, C586, M17, E1230)

(5 respondents) Allow access to green space is sustainable and good for health and wellbeing (C33, C57, C313, C333, E1238)

(5 respondents) Green belt land must be sustainably managed for biodiversity, carbon capture, recreation, etc (C434, C344, C516, C535, C589)

(4 respondents) Green belt and sustainable development go hand in hand (C33, C129, C138, C314)

(4 respondents) Put development where it will have least environmental impact (C165, C337, C406, C452)

(3 respondents) Improve air and water quality (C199, C208, C233)

(3 respondents) Stop speculative development applications (C235, C486, E1230)

(3 respondents) Will protect wildlife (C350, M8, E279)

(2 respondents) Stop large developments by restricting land (C514, C530)

(2 respondents) Allow for sustainable outdoor recreation (C280, C313)

(2 respondents) Should help avoid harmful development eg impact on infrastructure / water / natural resources (C63, E1025)

(2 respondents) Protect gaps (C146, E1232)

(2 respondents) Force developers to consider developing sites that are less economically profitable (C217, C475)

Emphasis importance of rural and historic landscapes (C231),

Brownfield land won't provide sufficient houses (E190)

Allocate sufficient sites for development to avoid speculative development proposals in the countryside (E1060)

Need to see it on a map to be able to comment properly (E1162)

Would focus development on urban areas where housing is needed and not on villages which lack infrastructure (C17)

Area is already constrained and greenbelt won't leave enough land for housing (E1116)

Question whether it is needed given 40% of the district is protected under SDNP (E1060)

Would reduce pollution (C31)

Generic approach is not appropriate need good land use on a place by place basis (C47),

Help meet carbon neutrality objectives (C144),

Additional comments relating to biodiversity and the natural environment

Natural and historic features such as trees should be conserved and enhanced. They are ecosystem services and habitats and climate change mitigation and can help mitigate flood risk and CO2 emissions(E1240)

GI study showed J9 M3 / A34 difficult to cross as pedestrian to get to SDNP, the tunnels under the road are unpleasant. The landscape is degraded in this area and recognition of landscape sensitivity, dark night skies and views and tranquillity is needed (E1240)

Call for sites

In addition, whilst we consider your call for sites during the designing of the Local Plan to be a step in the right direction, mitigation sites should be strategically decided based on spatial mapping of the Nature Recovery Network to ensure maximum benefit for people and nature. The process governed by the Strategic Housing Land Availability Assessment (SHLAA) has been a source of discord for local communities and inadvertently issued a presumption on future use or value of land put forward. This has been counterproductive for considering the Nature Recovery Network, opportunity areas or strategic green infrastructure. The new call for sites, which includes for biodiversity net gain, carbon and nutrient mitigation needs to assign equal weighting to the SHLAA in order to support effective strategic spatial planning and not be governed by the presumed availability and narrow focus of land coming forward. This approach will enable a multitude of benefits for the Local Plan optimising improvements to air quality and water management, public health and wellbeing, social cohesion all with the parallel objective of climate change adaptation and mitigation (E1203),

Green infrastructure

Winchester District's position, at the juncture of a range of protected landscapes and designated sites needs to make bold interventions through the emerging Local Plan to account for an acute deficit of robust open space for people, while being more

effective at protecting the special qualities or designations of those protected areas. It should provide an ambitious framework that will ultimately ease the planning process by providing investment in high quality green infrastructure.

Barton Meadows Nature Reserve in Winchester City is one such example of quality, sensory rich green infrastructure, negotiated through the planning system. The scale, proximity to residential areas, thoughtful approach to access alongside wildlife management and protection sets a bar of what can be achieved through the Local Plan. In conjunction with nearby, more formal open spaces and recreation grounds, this example ensures that local people benefit from the presence of more natural areas, while being able to sensitively utilise a functioning part of the local nature recovery network. A more definitive approach in this way would show commitment to working effectively in favour of sustainable development, delivering against the revised National Planning Policy Framework NPPF 2018) where it states, “development and policies should make sufficient provision for conservation and enhancement of the natural, built and historic environment, including for landscapes and green infrastructure and planning measures to address climate change mitigation and adaptation.” (E1203)

The pressure on Winchester’s wildlife rich and sensitive sites highlights both the problem for wildlife protection and recovery but also demonstrates what people are seeking in terms of their outdoor recreation. Traditional amenity spaces lack the enjoyment and fulfillment of more natural settings, amplified during Covid restrictions by a significant proportion of the public. A green infrastructure policy that commits to delivering these aspects within new and existing spaces will encourage active lifestyles, safe places and community engagement with nature. We would like the Local Plan to include a green infrastructure policy that adopts high quality principles across the built footprints of new and existing areas, in conjunction with open spaces and the nature recovery network. This would lead to increased sustainability of developments, boost climate resilience and public wellbeing, as well as increase value, support a resilient economy and desire to live in the district. An exemplary approach to achieving this is the Building with Nature Standard where wellbeing, biodiversity and water are core foundations to providing a pathway through planning with reduced uncertainty and setting the bar to what good looks like in high quality green infrastructure for all communities. Nature-based solutions(E1203)

Whilst you mention the call for mitigation sites, including for biodiversity net gain and nitrate mitigation, within your strategic issues and priorities document, we are disappointed that you haven’t recognised the importance of nature-based solutions to tackle some of the key issues you have identified in your new local plan, such as tackling the climate crisis.

Considering your overarching objective is carbon neutrality, we would also encourage you to consider including nature-based solutions as a strategic objective and priority to be considered for the local plan. For example, South Downs Local National Park Authority Local Plan in 2019 adopted an Ecosystem Services Policy as one of three core principles which provide the overarching

framework for evaluating all development proposals in the National Park, recognising the value of nature-based solutions and embedding them into planning and decision making.

Hampshire and Isle of Wight Wildlife Trust is well positioned to deliver biodiversity net gain and mitigation for nitrates or carbon, prioritising significant added value. We are currently one of the only organisations delivering an established nitrates mitigation programme and will soon be launching other nature-based solutions services. We would be pleased to discuss these in more detail with you.(E1203)

Vision for a Wilder Hampshire

The Wildlife Trusts are calling for at least 30% of land and sea to be restored for nature and climate by 2030 – planned and delivered as a nature-recovery network and providing nature-based solutions such as pollution reduction, carbon removal and flood management. As part of this we have an ambition to double the land that we manage for nature including new nature reserves, rewilding sites and creation of new wildlife habitats. We would welcome Winchester City Council joining this ambition and putting in place a clear commitment backed by mapping and appropriate policy mechanisms to ensure that the state of nature is turned around and wildlife starts to recover during this decade (E1203)

Response from Natural England Statutory Consultee.

• Issue 2: Biodiversity and the Natural Environment

Nutrient neutrality

It is welcomed that the Council is seeking to allocate land through the local plan process to strategically address the impact of nutrients from new development on the River Itchen SAC and Solent marine designated sites, which are currently showing levels of eutrophication with consequential effects on protected species and habitats.

It is advised a nitrogen budget is calculated for the Local Plan and a strategy is devised for delivering nutrient neutral mitigation for all sites. Mitigation can come forward via several different options including on-site provision by larger development sites through green infrastructure/open space or by a local authority-led scheme for the smaller/windfall development or where any top-up is required from larger developments. Other wider strategic schemes approved by the local authority and Natural England may also be available and where these are relied upon it is advised that credits are secured/reserved to ensure that there is adequate supply available for the local plan growth. Bespoke solutions at Neighbourhood plan or development level can also come forward.

Please note that the term 'nutrient' or 'nitrogen' should be used when discussing eutrophication of the marine Solent designated sites ('nitrates' specifically is a component of total nitrogen). When discussing eutrophication of riverine systems, 'phosphorus' should be the term used rather than 'phosphates'.

River Itchen – phosphorus

With regards to eutrophication, phosphorus is currently a limiting factor within the River Itchen SAC. The local plan should seek to preserve water quality on the Itchen and ensure that local plan and windfall development within the district will not increase the phosphorus loading on the SAC from wastewater and surface run off.

Water resources

The intention for stricter water use in the district is discussed under Issue 1 Carbon Neutrality. The water resource problems in the region also have implications for protected sites within the district, particularly the River Itchen Special Area of Conservation (SAC).

Natural England strongly recommend that all new development adopt a higher standard of water efficiency of 100 litres/per person/day, including external water use and re-use, in line with

Southern Water's Target 100 demand reduction programme. Consideration should be given to the use of grey water recycling systems and efficient appliances.

River Itchen compensatory habitat

It should be noted that following the Environment Agency changes to Southern Water abstraction licences to protect the River Itchen SAC, compensation packages have been agreed between the Environment Agency, Natural England and Southern Water as a result of the Test and Itchen Public Inquiry and the S20 agreement. The River Meon is being considered as compensatory habitat for Atlantic Salmon, therefore it is advised that the local plan HRA considers the River Meon as a proposed SAC for Atlantic Salmon. This is also likely to have implications for the headwaters of the Meon. Further details on locations of this compensatory habitat will be provided once Natural England has had confirmation of its location.

Biodiversity Net Gain

Natural England strongly supports the requirement for development to deliver a 10% net gain in biodiversity. Net gain calculations can however be complex and open to a considerable degree of interpretation and wide margin of error that could potentially lead to

biodiversity loss if not properly validated. Natural England therefore strongly advises that developers are required to agree their calculations with your Council through a suitably designed process or protocol.

The plan's approach to biodiversity net gain should be compliant with the mitigation hierarchy, as outlined in paragraph 175 of the NPPF. The policy should ensure that biodiversity net gain is not applied to irreplaceable habitats and should also make clear that any mitigation and/or compensation requirements for Habitats sites should be dealt with separately from biodiversity net gain provision.

Please see further detailed advice on biodiversity net gain at Annex A of this letter, including advice on evidence and monitoring.

Blue/green infrastructure

It is recommended the work on the Green/Blue Infrastructure Framework and Action Plan, that will go on to inform the local plan, assesses the equivalent economic value (natural capital) of new greenspaces, including the increased desirability and value of houses provided with high quality green infrastructure and the value to improved health and wellbeing.

We recommend the Plan outlines the need for securing the long term management of new and existing green infrastructure (GI) and for protecting it from future development. Options could include the use of conservation covenant agreements, LNR declaration, Fields in Trust designation, green space designation in neighbourhood plans or Town and Village Green registration. Alternatively land can be passed on to a suitable NGO, or to your Council, or a Town or Parish Council.

Policy and supporting text should set minimum accessibility, quantitative and quality requirements for new green infrastructure. Natural England recommends this is achieved by adopting Accessible Natural Greenspace Standards (ANGSt) or replacement standards if revised, as a minimum requirement for new housing development. ANGSt includes the quantity, accessibility, quality and services standards for accessible greenspaces. Natural England is currently leading national work on a Green Infrastructure Standards project, expected to launch later this year. This will be a vital contribution to delivery of the 25 Year Environment Plan. We will be happy to continue to advise your authority as this work progresses.

The Local Plan should also reference the following green infrastructure policy standards:

➤ Keep Britain Tidy runs the Green Flag Award scheme on behalf of Government. Anyone can apply to have their greenspace assessed against the Green Flag Award Quality standard, for payment of a fee. The Award is adaptable to a range of types of greenspace including parks, gardens, social housing, etc.

- The Sensory Trust published 'By All reasonable Means' which sets good practice guidance on providing access to the natural environment for people of all abilities. Although not all areas will be able to provide this (such as some wildlife areas), the aim is to get the majority of areas accessible to all at least in part.
- The Forestry Commission has developed guidelines for Tree canopy cover, to be set for a local area, based on evidence showing that 20% is a good aspiration, depending on the current level.
- The Woodland Trust recommend woodland access standards. Accessible woodland of at least 2 ha should be available with 500 m of new homes and woodland of at least 20 ha within 4 km.

The plan should ensure new green infrastructure and habitat creation is monitored to ensure that it develops in accordance with its stated intention.

New development located in easy walking distance from existing natural greenspace and publicly accessible nature reserves will benefit substantially by the presence of such facilities in the locality and will through an increase in visitors, inevitably increase ongoing visitor management costs.

Where the management of the green infrastructure is not already secured (e.g. through SANG payments), local plan policy should require development to make a financial contribution appropriate to the scale of the development to the managers of the reserve / greenspace to cover these additional costs. This is particularly important where the nature reserves, or nature parks, are run by charities that do not have secured income to cover the in perpetuity management costs associated with new housing development.

The Plan should commit the authority to developing a strategic approach to maintaining and enhancing networks of habitats and green infrastructure (as required by NPPF paragraph 171). This should include detailed requirements for new areas of green infrastructure along with a review of existing to ensure that they are meeting the multifunctional benefits and thereby maximising their Natural Capital.

Green Belt

Natural England advises that work on establishing a Green Belt in the south of the district should ensure it considers the value of green belt land for the provision of multifunctional greenspace in close proximity to existing development. This should include opportunities for providing publicly accessible natural greenspace, enhanced wildlife value and ecological connectivity, reduced nutrient runoff including treatment wetlands and carbon sequestration.

