

NE9 - Landscape character

- Support - 25
- Neither support of object - 13
- Object - 11

The changes to the supporting text and the Local Plan policies have not only been informed by the responses to the Regulation 18 consultation but they have also taken on board any additional feedback that has come out of discussions/meetings with statutory consultees and members in order to improve the clarity and understanding of the contents of the Local Plan.

Comments in support of NE9 - landscape character		
Respondent number	Comment	Officer comment
ANON-KSAR-NKBD-G	Any development at Bushfield must protect historic views and be in sympathy with the local landscape and should not create light pollution,	Comments Noted. Please see Policy W5 and Policy D7. Recommended Response: No Change
ANON-KSAR-NKC8-5	please not allow the destruction of our rural character and green fields by allowing additional, unsustainable development	Comments Noted Recommended Response: No Change
ANON-KSAR-NKDW-5 Littleton and Harestock Parish Council	The landscape of the district is very important to its character and function. The policy permits new development where it protects and enhances the district's distinctive landscape character. Littleton and Harestock Parish Council supports the policy. Support Policy NE9	Support welcomed and comments noted. Recommended Response: No Change

<p>ANON-KSAR-NKXV-R</p>	<p>But there is no mention of Valued Landscapes.</p> <p>The up to date NPPF 2021 para 174a) talks about Valued Landscapes. There is clear guidance about the criteria that should be applied to assess whether a landscape is Valued.</p> <p>It is not only the LPA that can assess a landscape as being valued but it is important that our policies have active protection for landscapes which are assessed as being Valued.</p> <p>I would like to see the policy strengthened under point iv. by saying "Development proposals within designated landscapes, or the setting of designated landscapes(...) or landscapes assessed as being Valued Landscapes must be based on a demonstrable understanding of the design principles of the landscape and should be complementary to it."</p>	<p>General support welcomed.</p> <p>The NPPF does not require local authorities to designate 'Valued Landscapes'. The majority of the district is protected 'Countryside' under current Local Plan policies MTRA4 and CP20 of the current local plan Part 1, and Policies DM15 and DM23 of the Local Plan Part 2. If Valued Landscapes were to be applied, it is unclear which part of the above policies would apply to valued landscapes. It is also unclear what additional protection would be given over and above the existing 'Countryside' designation.</p> <p>In order for a landscape to be considered 'Valued', the Landscape Institute define this as an 'area having sufficient landscape qualities to elevate it above other everyday landscapes'. The institute has produced a guidance note entitled "Assessing landscape value outside national designations' which includes a range of factors to consider when assessing the value of a landscape.</p> <p>As the NPPF does not define what a 'valued landscape' is and contradictions in case law as to what defines a, 'valued landscape', the Local Plan will not be</p>
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		<p>seeking to designate 'Valued Landscapes'.</p> <p>In practice the countryside already enjoy protection from development through the current countryside policies in the adopted Development Plan.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-N8X5-4	The Dever Society made detailed points on landscape character in our response to the SIP consultation, with specific reference to the mid-Hampshire Downs and the Dever Valley. These points are still relevant and we would like them to be taken into account.	<p>Comments Noted and comments on the SIP taken into account.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-N85J-P	Please refer to submitted (emailed) representations titled 'Manor Parks Regulation 18 Representations' and accompanying appendices.	<p>Comments Noted. This is a specific representation promoting a site that has not been allocated for development in the Local Plan.</p> <p>Recommended Response: No Change.</p>
ANON-KSAR-N8Q5-W	<p>In supporting this policy, we particularly welcome paras ii and iii.</p> <p>We request that the policy is strengthened by adding reference to the nature recovery network, eg in iii) "enhances biodiversity, supports the local nature recovery network and contributes to the delivery of green infrastructure".</p> <p>We welcome the preference for native species in iii). We would further encourage the specification where possible of UK sourced and grown tree stock for new planting, to support biodiversity and resilience, eg " and uses native species, wherever possible of UK sourced and grown stock from biosecure sources".</p>	<p>Support Noted and comments welcomed.</p> <p>It is important that the Local Plan is read as whole as there are a number of other LP policies that deal with biodiversity, green infrastructure, nature recovery network and nature based solutions to tackle climate change.</p> <p>Recommended Response: No Change</p>

<p>BHLF- KSAR- N8T8-3 Olivers Battery Parish Council</p>	<p>OBPC supports Policy NE9, but Landscape Character Assessment makes no judgment on the value of the landscape and cannot be a substitute for identification and designation of Valued Landscapes.</p>	<p>General support welcomed.</p> <p>The NPPF does not require local authorities to designate 'Valued Landscapes'. The majority of the district is protected 'Countryside' under current Local Plan policies MTRA4 and CP20 of the current local plan Part 1, and Policies DM15 and DM23 of the Local Plan Part 2. If Valued Landscapes were to be applied, it is unclear which part of the above policies would apply to valued landscapes. It is also unclear what additional protection would be given over and above the existing 'Countryside' designation</p> <p>In order for a landscape to be considered 'Valued', the Landscape Institute define this as an 'area having sufficient landscape qualities to elevate it above other everyday landscapes'. The institute has produced a guidance note entitled "Assessing landscape value outside national designations' which includes a range of factors to consider when assessing the value of a landscape.</p> <p>As the NPPF does not define what a 'valued landscape' is and contradictions in case law as to what defines a, 'valued landscape', the Local Plan will not be</p>
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		<p>seeking to designate ‘Valued Landscapes’.</p> <p>In practice the countryside already enjoys a reasonable degree of protection from development through the current countryside policies in the adopted Development Plan.</p> <p>Recommended Response: No Change</p>
<p>BHLF- KSAR- N8RZ-3</p>	<p>I support Policy NE9 on Landscape Character but this should make a judgment based on the value of the landscape and must not be a substitute for the identification and designation of Valued Landscapes.</p> <p>It is an issue of some concern to me as Oliver’s Battery is surrounded by Valued Landscapes and that WCC’s opposition to this, as evident at WCC’s recent Local Parish Meeting, in not distinguishing the quality of landscapes, goes against designating some areas National Parks and AONB, as well as Valued Landscapes. It leaves this area less strongly protected against inappropriate development as similar landscapes in East Hampshire which cannot be equitable or appropriate.</p> <p>It is a major concern to me and I would support the need for a protected settlement gap and between Oliver’s Battery and Hursley, some of which fits the inclusion in the Local Plan criteria of Valued Landscape. I strongly support WCC in that no new allocation of housing is required at Texas Field, Port Lane, Pitt Vale and South Winchester Golf Course should be or needs to be included in this Local Plan.</p>	<p>General support welcomed.</p> <p>The NPPF does not require local authorities to designate ‘Valued Landscapes’. The majority of the district is protected ‘Countryside’ under current Local Plan policies MTRA4 and CP20 of the current local plan Part 1, and Policies DM15 and DM23 of the Local Plan Part 2. If Valued Landscapes were to be applied, it is unclear which part of the above policies would apply to valued landscapes. It is also unclear what additional protection would be given over and above the existing ‘Countryside’ designation</p> <p>In order for a landscape to be considered ‘Valued’, the Landscape Institute define this as an ‘area having sufficient landscape qualities to elevate it above other everyday landscapes’. The institute</p>

		<p>has produced a guidance note entitled “Assessing landscape value outside national designations’ which includes a range of factors to consider when assessing the value of a landscape.</p> <p>As the NPPF does not define what a ‘valued landscape’ is and contradictions in case law as to what defines a, ‘valued landscape’, the Local Plan will not be seeking to designate ‘Valued Landscapes’.</p> <p>In practice the countryside already enjoys a reasonable degree of protection from development through the current countryside policies in the adopted Development Plan.</p> <p>Recommended Response: No Change</p>
BHLF-KSAR-N8BQ-A	We welcome acknowledgement that much of the landscape is man-made and thereby noting the crossover between the natural environment and historic environment.	<p>Support welcomed and comments noted.</p> <p>Recommended Response: No Change</p>
BHLF-KSAR-N8BS-C	<p>BSP acknowledge the importance of landscape character and distinctiveness when considered in the context of development. The vision for the site at Lovedon Lane embeds a landscape-led approach and the design has been informed by the existing character and context.</p> <p>The landscape-led strategy for the site achieves the following:</p> <ul style="list-style-type: none"> - Continuation of the undeveloped edge of Kings Worthy to respect the immediate setting of the South Downs National Park and ensure that 	<p>Comments noted in relation to site specific elements of the proposal.</p> <p>Recommended Response: No Change</p>

	<p>the settlements of Kings Worthy and Abbots Worthy retain their identities as distinct and separate communities.</p> <ul style="list-style-type: none"> - Green 'gateway' to Kings Worthy, to complement the existing settlement, with the inclusion of a community orchard which has multiple benefits in terms of Green Infrastructure functionality and health. - Sustainable Urban Drainage, creating a new character to the open space provision on the settlement edge and enhancing Green Infrastructure functionality. - New woodland planting within the north-east of the site to ensure longevity of the dominant characteristics within this part of the site - Connecting the existing POS with new POS to connect communities both physically and perceptually ensuring community cohesion. 	
BHLF-KSAR-N8B3-C	<p>We support the positive wording of Policy NE9, and in particular the acknowledgement at iv. That:</p> <p>“development proposals within designed landscapes, or the setting of designed landscapes, (including those on the Historic England Register of Historic Parks and Gardens and Locally Registered Historic Parks and Gardens (Hampshire Gardens Trust) are based on a demonstrable understanding of the design principles of the landscape and should be complementary to it.”</p> <p>For us, this is an important acknowledgment that development can be located within the setting of important landscape features providing that they are based on a sound understanding of the site and its context, and should not be sterilised per se.</p> <p>In our view, Site CU39, with its mature landscaped edges can be developed in a way that makes a positive contribution to its context.</p>	<p>Comments Noted.</p> <p>Recommended Response: No Change</p>
BHLF-KSAR-N868-5	<p>We support the positive wording of Policy NE9, and in particular the acknowledgement at iv. that “development proposals within designed landscapes, or the setting of designed landscapes, (including those on the Historic England Register of Historic Parks and Gardens and Locally Registered Historic Parks and Gardens (Hampshire Gardens</p>	<p>Comments Noted.</p> <p>Recommended Response: No Change</p>

	<p>Trust) are based on a demonstrable understanding of the design principles of the landscape and should be complementary to it.” For us, this is an important acknowledgment that development can be located within the setting of important landscape features providing that they are based on a sound understanding of the site and its context, and should not be sterilised per se. In our view, Site BW12, with its mature landscaped edges can be developed in a way that makes a positive contribution to its context.</p>	
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Comments which neither support nor object to NE9 - landscape character		
Respondent number	Comment	Officer comment
ANON-KSAR-NKXA-3	Draft Policy NE9 (Landscape Character) permits development where it conserves and enhances landscape character. As per our representations to the policies above, further detail and greater flexibility should be applied to this policy, and allowances made for the provision of glamping, pods, lodges and ancillary uses and buildings, including storage, that supports existing tourism development where it is sensitively and appropriately designed.	<p>Comments Noted. It is important that the LP is read as a whole. Adding every use class to the policy would result in policy which contains too much wording.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-N8YM-W	BSP support the principle of permitting new development where it protects and enhances the district’s landscape character. In particular, this includes where development proposals have been informed by the existing landscape character. The proposals at Fairthorne Grange have been developed on a landscape-led approach, with careful consideration of landscape setting and features, both on and adjacent to the site. This includes creating a strong landscape defensible edge and strengthening the woodland belt adjacent to Shawfords Lake. In addition, through the inclusion of development set backs, there is the	<p>Comments Noted.</p> <p>Recommended Response: No Change</p>

	potential to reinforce the existing tree belt and hedgerows along the railway line and Botley Road which border the site.	
ANON-KSAR-NKAB-D	<p>BSP support the principle of permitting new development where it protects and enhances the district's landscape character. In particular, this includes where development proposals have been informed by the existing landscape character. The proposed draft allocation BW4 for Land North of Rareridge Lane has been predicated on a landscape-led design approach which is considered closely aligned with the strategic ambition of Policy NE9. The proposed landscape strategy has been developed to directly respond to the site's setting and ensure inclusion of necessary buffers, reflecting the site's position as the interface between the adjacent National Park, and the settlement of Bishop's Waltham itself. Key landscape features proposed as part of this opportunity include the following:</p> <ul style="list-style-type: none"> • Provision of woodland block on western boundary, comprising retained scrub, supplemented with native broadleaved trees; • Inclusion of a 10 metre wide shrub and tree belt to comprise entirely native stock, designed to replicate the existing settlement edge to the immediate west. This will help assimilate the built development with the agricultural landscape to the north. It is also envisaged that there will be a further minimum 10 metre wide open landscape buffer on the northern edge of the site to be planted with specimen parkland trees. • On the eastern edge of the site, it is proposed to include a 25 metre wide woodland belt. Within this zone, existing deciduous trees will be retained where possible, and there would be a phased removal and replacement of coniferous trees with locally prevalent native trees to preserve screening potential of structural planting and enhancing the landscape character. 	<p>Comments Noted.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-N81Y-1	Paragraphs 7.77 and 7.79 of the draft Local Plan refer to the local plan background document open space assessment which includes incorrectly the eastern fields of the Bushfield Camp site as open space.	Comments noted

	<p>We want to raise this issue with the Council and request that it can be regularised through the Local Plan process.</p>	<p>Thank you for raising this. The council agrees that there has been an error in the mapping. The eastern meadow will be taken off the map and an adjustment made to the adequacy table for Compton.</p> <p>Recommended response:</p> <p>We will correct any errors on the city council website. We can do that over the next few days. Revising the Assessment would wait until later. In the meantime, the corrections are being made to the GIS shapefile to ensure when the Open Space Assessment is reviewed the eastern fields of the Bushfield Camp site will not be noted as open space.</p>
<p>ANON-KSAR-NKFQ-1 Upham Parish Council</p>	<p>We believe that the introduction to this policy should be amended to read 'The Local Planning Authority will ONLY permit new development..... Development proposals may be permitted BUT ONLY IF they conserve and enhance landscape character by evidencing...</p> <p>The Landscape Character Assessment is a worthy document but it has not, for understandable reasons, been written with use as a tool in development management in mind. This requires the policy to be written in more explicit terms and we believe it should be made clear that failure to demonstrate compliance with all of clauses i-vi will result in refusal.</p> <p>in clause ii hedges should be explicitly mentioned as one of the</p>	<p>Comments Noted. The addition of “only” is not considered appropriate as the policy is already explicit in that new development will be permitted if it conserves and enhances the landscape. This also applies to the wording of the clauses.</p> <p>In regards to Hedges, this has been added to clause ii.</p> <p>In regards to ASLQ's, like Valued Landscapes' it is unclear what additional</p>

	<p>features contributing to local distinctiveness.</p> <p>The majority of lower Upham outside the Park is on the Durley Claylands, an area characterised by strong hedgerows with hedgerow oaks. Good exemplars of this distinctive landscape type used to be labelled an Area of Special Landscape Quality, a level down from an AONB and now discontinued. It would be helpful to the objectives of the plan if the formerly designated ASLQs could be redesignated within the Landscape Character Assessment and their special characteristics given enhanced protection.</p>	<p>protection over and above the 'Countryside' an ASLQ would provide with the same response to comments on "Valued Landscapes" being applicable to ASLQ's.</p> <p>Recommended Response: Add 'Hedges' to Clause ii.</p>
BHLF-KSAR-N8TJ-N	<p>Draft Policy NE9 (Landscape Character) permits development where it conserves and enhances landscape character. As per our representations to the policies above, further detail and greater flexibility should be applied to this policy, and allowances made for the provision of glamping, pods, lodges and ancillary uses and buildings, including storage, that supports existing tourism development where it is sensitively and appropriately designed.</p>	<p>Comments Noted. It is important to read the LP as a whole. Uses such as glamping and pods etc would need to meet the requirements of the policy.</p> <p>Recommended Response: No Change</p>
BHLF-KSAR-N8T1-V	<p>The policy should establish a framework to distinguish between the hierarchy of international, national and locally designated sites. The policy should also define how mitigation should be taken into account when considering new development and how it 'protects and enhances'.</p>	<p>Comments Noted. In regard to the framework, there is no requirement for inclusion of this as all these sites would be protected. In regard to mitigation, this would be determined on a case by case basis.</p> <p>Recommended Response: No Change</p>
BHLF-KSAR-N8R2-U Hursley Parish Council	<p>Valued Landscapes</p> <p>The National Planning Policy Framework Planning policies should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes in a manner commensurate with their statutory status or identified quality in the development plan).</p>	<p>General support welcomed.</p> <p>The NPPF does not require local authorities to designate 'Valued Landscapes'. The majority of the district is protected 'Countryside' under current Local Plan policies MTRA4 and CP20 of</p>

	<p>(Ref; NPPF para 174 – https://www.gov.uk/guidance/national-planning-policy-framework/15-conserving-and-enhancing-the-natural-environment)</p> <p>Court cases have established that a ‘valued landscape’ is a landscape outside a "designated landscape" (for example the national park or AONB) that is more than ‘mere countryside’ but is a landscape that has physical and demonstrable attributes which take it ‘out of the ordinary.’ Court cases also establish that development in a Valued Landscape should be restricted, on the basis that the social and economic benefit of development would be significantly outweighed by the environmental harm caused, and that this is a material consideration to be taken into account in the decision-making process.</p> <p>(Ref; Turley High Court Decision – https://www.turley.co.uk/comment/recent-high-court-decision-confirms-valued-landscapes-not-quite-so-valued#:~:text=Since%20the%20%E2%80%98Stroud%E2%80%99%20Court%20of%20Appeal%20decision%20in,them%20above%20the%20ordinary%20may%20constitute%20%E2%80%98valued%20landscapes%E2%80%99.)</p> <p>It follows that a Valued Landscape has more protection in planning terms than "ordinary countryside" (but less than landscape in a national park or AONB). Large scale housing or solar development will rarely be appropriate or sustainable in Valued Landscapes. So, it is clear that when significant development is being considered, such as housing or renewable energy schemes, it is important to know where the district has Valued Landscapes.</p>	<p>the current local plan Part 1, and Policies DM15 and DM23 of the Local Plan Part 2. If Valued Landscapes were to be applied, it is unclear which part of the above policies would apply to valued landscapes. It is also unclear what additional protection would be given over and above the existing ‘Countryside’ designation</p> <p>In order for a landscape to be considered ‘Valued’, the Landscape Institute define this as an ‘area having sufficient landscape qualities to elevate it above other everyday landscapes’. The institute has produced a guidance note entitled ‘Assessing landscape value outside national designations’ which includes a range of factors to consider when assessing the value of a landscape.</p> <p>As the NPPF does not define what a ‘valued landscape’ is and contradictions in case law as to what defines a, ‘valued landscape’, the Local Plan will not be seeking to designate ‘Valued Landscapes’.</p> <p>In practice the countryside already enjoy protection from development through the current countryside policies in the adopted Development Plan.</p>
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<p>Use of the Housing Distribution Sequence and policies for solar farms set out below will assist them in avoiding inappropriate development in Valued Landscape. The words in brackets in paragraph 174(a), added to the NPPF in 2018, indicate that in Local Plans adopted after 2018 Valued Landscapes should be "identified" by way of a map, with an accompanying protective Policy in the text.</p> <p>(Ref; NPPF Valued Landscape Policy – https://www.gov.uk/guidance/national-planning-policy-framework/15-conserving-and-enhancing-the-natural-environment)</p> <p>Valued Landscape corresponds quite strongly with the local landscape designations that used to be identified in Local Plans, such as Areas of Special Landscape Quality (ASLQ). Policy C7 of the Winchester District Local Plan 1998 designated areas (outside the then Area of Outstanding Natural Beauty, now National Park) as ASLQ the Dever Valley, Itchen Valley, Abbotstone, North Hursley, North Bishops Waltham, the Meon Valley, Durley Hall and Portsdown Hill.</p> <p>The valued landscapes in the Hursley Parish are considered to be the land between Olivers Battery and Hursley, the land between Hursley and Otterbourne and the land between Hursley and Braishfield.</p> <p>In these areas development was only permitted where it would avoid and or minimise any adverse effects on the character, quality and appearance of the area concerned. They are likely to be Valued Landscapes. Landscape Character Assessment is useful but does not assess the value of landscape. It follows that a district wide assessment (outside the South Downs National Park) is needed to identify and map Valued Landscapes for the emerging Local Plan, with policies in the text to give them appropriate protection. This would accord with the NPPF and a "landscape-led" approach. The key point</p>	<p>Recommended Response: No Change</p>
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	is that the local plan does not include a policy for designating valued landscapes and does not provide for neighbourhood plans to provide either. The parish would not wish the option to designate valued landscapes potentially closed off by the local plan. Provision could be made by amending Policy NE9.	
BHLF- KSAR- N87J-R Micheldever Parish Council	This policy reads as if it only relates to built environments but should also reflect the northern area of the district and others that are predominantly active / productive farmland.	Comments Noted. The policy relates to new development throughout the district. Recommended Response: No Change
BHLF- KSAR- N8Z7-8 South Downs National Park Authority	Policy NE9 – Landscape Character We welcome the inclusion of Policy NE9 and;	Comments Noted and support welcomed. Recommended Response: No Change
	· Paragraph 7.74 – The last sentence should be reworded to place an emphasis on an understanding of place, and using this to identify opportunities for positive place-making.	Comments Noted. Have added the following wording” <u>and their setting and place in the landscape is considered</u> ”. The Council would welcome further discussions with the SDNPA about this. Recommended Response: Add the following to Paragraph 7.71 <u>and their setting and place in the landscape is considered</u> ”.
	· Policy NE9 – We welcome the use of the word “evidencing”.	Comments Noted and support welcomed. Recommended Response: No Change

	<p>· Policy NE9, Criterion (ii) – Could be expanded to include greater explanation about “setting”, or an additional criteria addressing setting needs (especially in relation to SDNP).</p>	<p>Comments Noted. Whilst the point is noted, it is difficult to provide an explanation of setting as this may alter depending on the nature of each case.</p> <p>Recommended Response: No Change,</p>
	<p>· Policy NE9, Criterion (v) – Could be expanded to by explaining that the layout of development should be informed by settlement pattern and the character it creates.</p>	<p>Comments Noted. The following wording has been added at the end of the criterion: “Where possible, the layout of development should be informed by the existing settlement pattern and the character it creates”.</p> <p>The ‘where possible’ has been added as not all settlements, particularly smaller settlements, will not have a clear pattern.</p> <p>Recommended Response: Add the following wording at the end of criterion v: “<u>Where possible, the layout of development should be informed by the existing settlement pattern and the character it creates</u>”.</p>
	<p>· Policy NE9 – We refer you to the following criteria from Policy SD4 of the South Downs Local Plan for consideration in drafting Policy NE9:</p> <ul style="list-style-type: none"> o The design, layout, and scale of proposals conserve and enhance the existing landscape character features which contribute to the distinctive character, pattern, and evolution of the landscape; o The design, layout, and scale of proposals will safeguard the experimental and amenity qualities of the landscape; and 	<p>Comments Noted. Whilst the wording of Policy NE9 of the SDNP LP is noted, it is important that the WCC LP is read as a whole. A number of the criteria in Policy NE9 in the SDNP LP are covered in the topic on high quality, well designed and living well topic and appear to be based around the landscape of the National</p>

	<p>o The restoration of landscapes where features have been lost or degraded will be supported where it contributes positively to landscape character.</p> <p>In addition to the above, we recommend that the explanatory text should include the definition of “landscape” and “landscape character”. The definitions in the South Downs Local Plan Glossary have been replicated below:</p> <ul style="list-style-type: none"> - Landscape is defined in the European Landscape Convention (ELC) 2004 as “an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors”. The ELC refers to the following area types which are considered to be included within the definition of landscape: <ul style="list-style-type: none"> o Natural, rural, urban and urban fringe areas; o Land, inland water and marine areas; and o Landscapes that might be considered outstanding as well as everyday or degraded landscapes. <ul style="list-style-type: none"> - Landscape Character is about what makes an area unique. It can be defined as a distinct, recognisable and consistent pattern of elements, be it natural (i.e., soil and landform) and/or human (i.e., settlement and development) in the landscape that makes of landscape different from another, rather than better or worse. 	<p>Park. The SNPA Local Plan is based around a more landscape led approach.</p> <p>Recommended Response: No change.</p>
<p>BHLF- KSAR- N8ZE-P</p>	<p>Landscape Character</p> <p>The City Council supports the inclusion of Policy NE9 which focuses on protecting and enhancing the District's distinctive landscape character</p>	<p>Comments Noted and support welcomed. Separate discussions will take place with PCC regarding Portsdown Hill.</p>

<p>Portsmouth City Council</p>	<p>as defined by the Landscape Character Assessment (LCA) 2022. Portsdown Hill runs along the southernmost edge of Winchester District and forms a distinctive boundary with Portsmouth (as outlined in LCA19 of the LCA). PCC supports the key management strategies as outlined in the LCA, which focuses on protecting, maintaining and restoring farmland, agricultural processes, the rural character and panoramic views all while respecting the setting of Fort Southwick and Fort Nelson. The protection of these heritage assets is vital and therefore PCC further support Policy HE6 of the emerging Local Plan setting out the evidence required as part of an application that has the potential to impact a scheduled monument. We look forward to working with WCC on the protection of Portsdown Hill and its important character and features.</p>	<p>Recommended Response: No Change</p>
<p>BHLF-KSAR-N863-Z</p>	<p><u>Policy NE9 Landscape Character</u></p> <p>This Policy makes reference to development having regard to the Landscape Character Landscape Character Assessment (April 2022)(LCA). The Plan should be more explicit on what elements of the LCA might reasonably be expected to be delivered through new development. For example, for each Landscape Character Area, considered in the LCA sets out 'Built Form Strategies'. To aid interpretation, the Policy should make specific reference to development having regard to relevant 'Built Form Strategies' section of the LCA, rather than the document as a whole.</p>	<p>Comments Noted. It would not be relevant to list each element of the LCA in the policy as it is dependent upon the type of development, as well as the character area in which the new development is proposed.</p> <p>Recommended Response: No Change.</p>

Comments which object to NE9 – Landscape character

Respondent number	Comment	Officer comment
ANON-KSAR-NK79-T	There should be an evaluation of any potential valued landscapes (non-designated) in the district. A starting point might be the previous Areas of Special Landscape Quality used in the past.	<p>General support welcomed.</p> <p>The NPPF does not require local authorities to designate 'Valued Landscapes'. The majority of the district is protected 'Countryside' under current Local Plan policies MTRA4 and CP20 of the current local plan Part 1, and Policies DM15 and DM23 of the Local Plan Part 2. If Valued Landscapes were to be applied, it is unclear which part of the above policies would apply to valued landscapes. It is also unclear what additional protection would be given over and above the existing 'Countryside' designation.</p> <p>In order for a landscape to be considered 'Valued', the Landscape Institute define this as an 'area having sufficient landscape qualities to elevate it above other everyday landscapes'. The institute has produced a guidance note entitled "Assessing landscape value outside national</p>

		<p>designations' which includes a range of factors to consider when assessing the value of a landscape.</p> <p>As the NPPF does not define what a 'valued landscape' is and contradictions in case law as to what defines a, 'valued landscape', the Local Plan will not be seeking to designate 'Valued Landscapes'.</p> <p>In practice the countryside already enjoys protection from development through the current countryside policies in the adopted Development Plan.</p> <p>Recommended Response: No Change</p>
<p>ANON- KSAR- NKHU-7</p>	<p>Landscape Character (Policy NE9) OBPC supports Policy NE9, but Landscape Character Assessment makes no judgment on the value of the landscape and cannot be a substitute for identification and designation of Valued Landscapes.</p>	<p>General support welcomed.</p> <p>The NPPF does not require local authorities to designate 'Valued Landscapes'. The majority of the district is protected 'Countryside' under current Local Plan policies MTRA4 and CP20 of the current local plan Part 1, and Policies DM15 and DM23 of the Local Plan Part 2. If Valued</p>

		<p>Landscapes were to be applied, it is unclear which part of the above policies would apply to valued landscapes. It is also unclear what additional protection would be given over and above the existing 'Countryside' designation.</p> <p>In order for a landscape to be considered 'Valued', the Landscape Institute define this as an 'area having sufficient landscape qualities to elevate it above other everyday landscapes'. The institute has produced a guidance note entitled "Assessing landscape value outside national designations' which includes a range of factors to consider when assessing the value of a landscape.</p> <p>As the NPPF does not define what a 'valued landscape' is and contradictions in case law as to what defines a, 'valued landscape', the Local Plan will not be seeking to designate 'Valued Landscapes'.</p>
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		In practice the countryside already enjoys protection from development through the current countryside policies in the adopted Development Plan. Recommended Response: No Change
ANON-KSAR-NKJV-A	<p>Bloor Homes supports the principle of permitting new development where it protects and enhances the district's landscape character. In particular, this includes where development proposals have been informed by the existing landscape character.</p> <p>The proposal at Mill Lane, Wickham has been developed through careful analysis of the landscape features and character of the site and its surroundings. The site provides a gateway to both Wickham and the adjacent South Downs National Park, and in response the northern part of the site will be retained as open space, with new copse and tree planting to act as a landscape buffer along the northern boundary of the residential development.</p> <p>Existing woodland around the edge of the site and individual trees around the site perimeter are the subject of tree preservation orders. Proposed development at the site will retain these trees, respecting their root protection areas.</p>	<p>Support welcomed and comments noted about the site in Wickham.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-N8NY-X	Designation of areas as Valued Landscape would give them more protection. This would be appropriate in the case of Texas Field, Pitt Vale, Port Lane and South Winchester Golf Course - all potentially vulnerable to unnecessary and inappropriate development.	Comments Noted. By proposing a valued landscape, this would give a higher value to an area which is not supported by National Policy. All areas are protected by the Countryside designation.

		Recommended Response: No Change
ANON-KSAR-N85G-K	<p>Twyford is wholly within the South Downs National Park (SDNP) but is surrounded on three sides by Winchester District with multiple interactions in all directions with over a range of activities and land uses. The recognition of these interactions is vital; it is most encouraging that the Draft Local Plan refers to the Twyford Neighbourhood Plan (TNP) as one of the component parts of the Statutory Development Plan for this part of the SDNP.</p> <p>The Twyford Neighbourhood Plan (TNP) was made by the SDNP Authority (SDNPA) in February 2022. It looks at cross border issues and has framed its policies to mesh in with those of the WDLP.</p> <p>1. Landscape: policy NE9: Twyford commissioned a bespoke landscape study as one of the key building blocks of its Neighbourhood Plan. This study by Terra Firma builds on the existing studies of both Winchester and the SDNPA and also that of the City of Winchester Trusts (The Setting of the City of Winchester). Reference should be made to the Terra Firma Study in the WDLP Evidence base. This is available on the Parish Council's website: http://twyfordhants.org.uk/wp-content/uploads/2022/12/Twyford-Parish-LandscapeAssessment.pdf.</p>	<p>Comments Noted.</p> <p>Recommended Response: No change</p>
ANON-KSAR-N81F-E	Bargate Homes consider that criterion vi) should include some flexibility such that where it is necessary to amend green or blue corridors to achieve greater sustainability benefits, then an appropriate scheme of compensation will be required, prioritising other opportunities for these corridors within the site.	<p>Comments Noted. It is not considered appropriate to amend the policy to allow this. Each case would be treated on its own individual merits.</p> <p>Recommended Response: No Change</p>
ANON-KSAR-NKKV-B	Renewable energy developments should be recognised as supported and even appreciated by many and not be assumed to be out of keeping with the environment. Since solar and wind installations are essentially reversible simply	Comments Noted. The policy references 'new developments' which would include renewable

	<p>not liking the way they look should not be regarded as a reason to refuse permission although reasonable accommodations should be accepted.</p>	<p>energy. It is important to read the Local Plan as whole - please also see Policy CN5.</p> <p>Recommended Response: No Change</p>
<p>ANON-KSAR-N81B-A</p>	<p>These policies need strengthening to prevent inappropriate and unwanted development.</p> <p>Wording 7.74 'Designated and protected features should not be seen as a constraint to change, but as a catalyst for regeneration and diversification, bringing economic, cultural and educational benefits.' This sentence appears to encourage development of designated and protected features. The use of a 'catalyst' as an image appears to encourage change, rather than protection. We must needs remember that catalysts can at times cause experiments to explode !</p> <p>Protection is missing in this policy, but there is no judgement of any sort of landscape quality hierarchy here, no judgement is possible on the value of the landscape and cannot be used instead of an identification and designation of Valued Landscapes.</p>	<p>Comments Noted. This is a referenced in the supporting text rather than the policy, which ensures the protection of the landscape and no loss of Blue and Green Infrastructure.</p> <p>Recommended Response: No Change</p>
<p>ANON-KSAR-N819-1</p>	<p>Amend iii</p> <p>Insert after green infrastructure....., ecosystem services.</p> <p>For definition of ecosystem services and benefits see examples in SDNP Plan.</p> <p>A more flexible approach is required to Land scape Character.</p> <p>Consideration should be given in light of the Climate and Biodiversity crises to allow, on merit, changes in land practises to further creative use of best and most versatile agricultural and other land which does not hinder land production or impact on climate and biodiversity issues.</p> <p>The aim should be to support changes to regulations whether NPA or</p>	<p>Comments Noted. The policy references 'new developments' which would include renewable energy. The policy does not prevent solar farms coming forward as long as they are compliant with this policy. It is important to read the Local Plan as whole - please also see Policy CN5.</p>

	<p>otherwise. For example, if an opportunity to use the most versatile agricultural land is made with benefits to carbon net zero and biodiversity then this should be allowed. WCC need to capture this data and to aid arguments to changes in planning restrictions.</p> <p>Continuing blind acceptance of current legislation without a challenge to the guidance in planning for a "strong presumption" against solar farms on the best and most versatile (BMV) land is unacceptable and unethical in the face of the environment, energy and food crises.</p> <p>Crop and /or livestock production failing to use land and light twice for maximum net zero contributions inc. for biodiversity enhancement plus new green businesses and economy benefits is a missed opportunity for the two crises. Land production can be enhanced for economic benefits for land land users and nature protection. This dual approach with twin income streams benefits agriculture land managers and communities.</p> <p>Solar farms have the potential to introduce a greater net gain in biodiversity for agricultural land. For example, Agrivoltaic schemes combine land production with solar energy generation which avoids the use of other greenfield sites for solar use which then allows more opportunities for nature/rewilding/nature recovery improvements.</p>	<p>Recommended Response: No Change</p>
<p>BHLF- KSAR- N8R5-X</p>	<p>Landscape: policy NE9: Twyford commissioned a bespoke landscape study as one of the key building blocks of its Neighbourhood Plan. This study by Terra Firma builds on the existing studies of both Winchester and the SDNPA and also that of the City of Winchester Trusts (The Setting of the City of Winchester). Reference should be made to the Terra Firma Study in the WDLP Evidence base. This is available on the Parish Council's website: http://twyfordhants.org.uk/wp-content/uploads/2022/12/Twyford-Parish-Landscape-Assessment.pdf</p> <p>WDLP Policy NE 7 proposes a comprehensive network of gaps particularly for</p>	<p>Comments Noted. Twyford lies in the SDNP – in view of this it would not be appropriate to refer to this in the LP Evidence base. Settlement gaps will be published at the Reg 19 stage – there is no intention/justification to include one at Colden Common.</p>

	the villages surrounding Winchester. The gap between Winchester and Twyford is sufficiently protected by the Itchen Valley, St Catherine's Hill and Twyford Down and by the Motorway, but the gap between Colden Common and Twyford is a typical narrow separation of the two settlements with their own character; both communities see this separation as important to their identities. It is under pressure for development. The TNP includes it as a protected gap by LHE 1, but stops at the Parish/WCC boundary, leaving out the important parts of the gap in Colden Common Parish. The Parish Council seeks you to consider the inclusion of a matching policy to LHE1 in consultation with Colden Common Parish Council.	Recommended Response:
BHLF- KSAR- N86N-U	Criterion vi should include some flexibility such that where it is necessary to amend green or blue corridors to achieve greater sustainability benefits, then an appropriate scheme of compensation will be required, prioritising other opportunities for these corridors within the site.	Comments Noted. It is not considered that such compensation measures would be appropriate. Recommended Response: No Change

	Recommendations	Officer response
Comments from SA	N/A	N/A
Comments from HRA		

Amendments to supporting text

7.72. The district has a diverse landscape character which underpins its special character. The retention and enhancement of these landscape assets is essential for the conservation of the district's unique sense of place and character and can bring wider social, cultural, economic and environmental benefits.

7.73. In this regard, the local planning authority has and will continue to undertake a proactive approach to the conservation and enhancement of the district's landscape. This approach will include the production of management plans and any other necessary studies and strategies to support the protection, maintenance and enhancement of the district's landscape. In addition, the district's distinctive landscape character, which derives from a combination of natural and man-made assets, contributes to its special

qualities. The importance of the landscape, both as a whole and locally-important features as identified in the Winchester District Landscape Character Assessment 2022 and the Winchester City and its Setting study 1998, highlight the necessity for these special qualities to be retained and respected in planning for growth and change.

7.74. Designated and protected features should not be seen as a constraint to change, but as a catalyst for regeneration and diversification, bringing economic, cultural and educational benefits. It is critical that, when development proposals are considered, these assets are given due consideration **and their setting and place in the landscape is considered** at the design stage to ensure that any adverse impacts are either avoided or can be fully mitigated.

Amendments to policy

The Local Planning Authority will permit new development where it protects and enhances the district's distinctive landscape character as defined in the Landscape Character Assessment 2022. Development proposals may be permitted where they conserve and enhance landscape character by evidencing;

- i. They are informed by the existing landscape character and respond positively to the landscape type within which they are located;
- ii. Local distinctiveness, especially in terms of trees, **hedges**, other landscape features, tranquillity, sense of place and setting has been taken into account;
- iii. New planting is consistent with local character, enhances biodiversity, contributes to the delivery of green infrastructure and uses native species, unless there are appropriate and justified reasons to select non-native species;
- iv. Development proposals within designed landscapes, or the setting of designed landscapes, (including those on the Historic England Register of Historic Parks and Gardens and Locally Registered Historic Parks and Gardens (Hampshire Gardens Trust) are based on a demonstrable understanding of the design principles of the landscape and should be complementary to it.
- v. The settlement pattern and individual identity of settlements and the integrity of predominantly open and undeveloped land between settlements will not be undermined. **Where possible, the layout of development should be informed by the existing settlement pattern and the character it creates.**
- vi. Green and blue corridors will be safeguarded. Development proposals should identify and take opportunities to create and connect green and blue corridors.

A Landscape Visual Appraisal (LVA) or a Landscape Visual Impact Assessment (LVIA) proportional to the proposed development must be provided in order to assess potential harm to the character of the area.