

Missing policy - Other

Respondent number	Comment	Officer comment
ANON-KSAR-NKUQ-G	<p>The plan is good but is not bold enough in recognising the urgency of the climate emergency. For instance there seems to be little on taking traffic out of the city.</p> <p>Section 5.5-5.61 provides plan diagrams which are incomprehensible without keys which is a big problem.</p> <p>The plan and the consultation are incompatible. I have the plan up on screen and find it nigh on impossible to navigate back to be in line the structure of the consultation document structure. I read the document and took notes by paragraph re many comments only to find that on the consultation I am asked to comment by heading and subheadings. For example, if I want to comment on para 5.5 I can't using the consultation document other than make this comment in this current section on what is missing. I suggest that the consultation should be ended and rescheduled until such time as the plan can be commented upon using the paragraph headings which is surely the standard practice in these matters.</p>	<p>Comment moved to sustainable transport</p>
ANON-KSAR-NKWW-R	<p>I have been in discussion with WCC and its Leader about the potential closure of the Corner House Public House in Winchester.</p> <p>Within this discussions, it became clear that there is not sufficient criteria within the local planning policy to deal with decisions regarding the closure of Public Houses and/or their conversion to housing.</p>	<p>Moved to Missing Policies – Economy</p>
ANON-KSAR-NKWW-R	<p>It was suggested by Martin Tod that I write into this consultation and propose that more specific criteria be adopted into the future Local Plan. Specifically, with developers often citing "unviability" of Public Houses, and with the current Local Plan having no assessment criteria for "unviability" I would like to propose that the CAMRA Viability Test (or parts of it) be adopted within the Local Plan to provide a structured framework for assessing if a Public House is viable or not. Without, developers will simply cite unviability by virtue of having marketed a</p>	<p>Moved to Missing Policies – Economy</p>

	Public House at an excessive price for a period of time. I have found the process of submitting this feedback hugely complex - please excuse the fact that I have had to use the "other" category, but I'm afraid the process is not easy for someone who wants to make a simple comment.	
ANON-KSAR-NKWX-S	Within the commentary there is no scope to respond to or comment on the NE3	Moved to natural environment
ANON-KSAR-NK66-P	There is no mention of Local Green Spaces. I feel that current green spaces that are used for recreation should be listed as Local Green Spaces to protect their status. EG St Matthews Field is a much used local green space. It is used for sport, exercise, Walking, Dog Walking and general relaxation. It should not be difficult to identify the current parks that re used in this way. It should not be incumbent on local communities to have to apply for local Green Space protection after the local plan has been published. They should be included in the plan	Moved to natural environment
ANON-KSAR-NK6B-2	There is no mention of green sites for public access in Winchester area	Moved to natural environment
ANON-KSAR-NK67-Q	There appears to be no mention of protecting areas currently used for outside sporting activity. This is vital for the health both physical and mental of all users. In the case of Winchester Rugby Club and its 1300 members , we use all of North Walls Park including Devils Island and our three pitches as well obviously and the space is vital to us functioning . These areas and other areas such as King George V playing fields must be protected for the reasons stated.	Moved to natural environment
ANON-KSAR-NK65-N	REF. Policy SH2. In support of my email comment placed here as there is nowhere in the consultation application on citizenspace to make amendments to policies in the plan. Burrige and Swanwick Residents' Association We feel that the following clause 'v.' in Policy SH2 of the regulation 18 version of the Winchester is inappropriate as written. 'v. Complete Whiteley Way at an early stage of development, in an	Moved to SH2

	<p>environmentally sensitive manner which does not cause undue severance for the new community or encourage traffic from adjoining areas to use the new route to gain access to the strategic road network;’</p> <p>It is our understanding that the improvements to Junction 9 which provide direct access from Whiteley to the M27 motorway in a Southerly direction and the new Botley bypass being built to improve traffic flow to the North have been planned specifically to ease the pressure on the existing road network.</p> <p>Local residents have been repeatedly told that Whiteley Way is a District Distributer Road. It has been specifically planned with sufficient width and swept curves to allow buses and all other vehicles to use it for access to the strategic road network.</p> <p>Whereas we understand the desire to protect the residents of North Whiteley from excessive traffic it is totally unreasonable to expect the existing adjoining road network to take the strain of traffic from all the new developments taking place in this part of Hampshire.</p> <p>In the spirit of the co-operation expected in the National Planning Policy Framework the use of Whiteley Way for this purpose should be a choice for motorists and not in any way discouraged.</p> <p>Therefore we expect the phrase ‘or encourage traffic from adjoining areas to use the new route to gain access to the strategic road network;’ to be removed from Policy SH2 in the plan.</p> <p>If this causes some ‘severance for the new community’ it is the result of designing North Whiteley to be built on either side of Whitley Way. Such inconvenience will be minimal compared to the traffic issues faced by residents affected by the current traffic flows.</p>	
<p>ANON- KSAR- NKZ5-S</p>	<p>Creating these new Policies and/or SPDs is recommended to support the Local Plan and aid clarification on some key issues where detail and explanation is not available elsewhere. This will ensure a coherent approach to understanding and application of the Plan with its related sections.</p> <p>1.) Protection of Mature Trees</p>	<p>Moved to CN and NE</p>

	<p>2.) Land for offsetting - Link to Nature based Solutions SPD.</p> <p>3.) Climate Change and Sustainable Construction Supplementary Planning Document (SPD). - Suggest creating something similar to: download (easthants.gov.uk)</p> <p>4.) Nature-based Solution</p> <p>Each Policy or SPD can be enhanced with A Technical Advice Note (TAN) If required, I can offer some help to create the above.</p>	
<p>ANON-KSAR-N819-1</p>	<p>Exactly as ANON-KSAR-NKZ5-S with the addition of the below:</p> <p>5.) Whole-Life Carbon</p> <p>6.) GIS and rich spatial data Something needs to be said upfront about how the Local Plan will know it is achieving the optimal development and investing decisions with the right carbon emission reduction and biodiversity protection. How will WCC track the impact of Local Plan decisions in a transparent manner to reassure the public the right balanced decisions are made in delivering the Local Plan? These questions highlight the need for a more digital friendly approach to understand and support the Plan with the use of Digital technologies for everyone. These means adopting the widest use of GIS data maps underpinned with good data. Evidence shows this approach will help reduce carbon emissions by up to 15% - one-third of the 50% reduction required by 2030</p>	<p>Moved to CN and NE and monitoring</p>
<p>ANON-KSAR-NK29-N</p>	<p>Several Supplementary Planning Documents are recommended to support Local Plan and aid clarification on needs to optimise the Plan. Suggestions with some topics for content are shown below:</p>	<p>Moved to CN and NE and monitoring</p>

1. Supporting renewable energy in the Local Plan

- Require new builds to maximise onsite renewable generation (not to achieve a minimum). If onsite renewable generation insufficient for a Development – create opportunities to optimise with local renewable energy schemes, ideally Community Energy schemes. Where costs and/or planning do not allow installation of such schemes, developers should contribute (pay) for grid upgrades to future proof Community Energy at a later stage.
- Create WCC Policies and Technical Advice, similar to Community-led Renewables Technical Advice Note (southdowns.gov.uk)
 - o to support solar farms, wind farms, energy storage facilities, anaerobic digestors
 - o Including agrivoltaic guidance
- Publish simplified planning guidance on rooftop solar for permitted development, listed homes, conservation areas, etc.
- Include a statement of community engagement to explain how it will engage with communities, businesses & organisations in the planning process.

2. Nature based Solutions - green ratio and biodiversity/ecosystem services

- Nature-Based Solutions Actions to protect, sustainably manage, and restore natural and modified ecosystems that address societal challenges effectively and adaptively, simultaneously benefiting people and nature. They work by increasing the quantity and quality of natural capital stocks and can enhance biodiversity. Networks can be considered components of Blue-Green Infrastructure. E.g., natural flood management, SuDS and arable reversion
- Can also include policy to maintain and enhance green spaces - protect existing ecosystems, restore and connect previously degraded ecosystems
- Specifying natural building products and materials under accepted standards.
 - o For example, London Energy Transformation Initiative (LETI) – Embodied Energy Carbon Primer - App.8 - Materials guide [252d09_8ceffcbcafdb43cf8a19ab9af5073b92.pdf](https://www.leti.uk/252d09_8ceffcbcafdb43cf8a19ab9af5073b92.pdf) (leti.uk) + WinACC SuperHomes advice note: 'Choosing nature based building products and materials'.

o Urban opportunities should not be overlooked IGNITION - Greater Manchester Combined Authority (greatermanchester-ca.gov.uk)

- Nature recovery is as crucial to our wellbeing as the elimination of carbon emissions and adaptation to changed climate.

3. Climate Change and Sustainable Construction Supplementary Planning Document (SPD).

- Suggest creating something similar to: download (easthants.gov.uk)
- To include Energiesprong UK for Whole Building Retrofits at scale and speed.

4. Land for offsetting

- Link to Nature based Solutions SPD.
- In exceptional circumstances offsetting can be acceptable where no alternative in the immediate locality is available to achieve carbon net zero.
- Offsetting schemes must be regulated and combined with optimal NbS high standards of implementation and management to ensure they deliver optimal climate and biodiversity benefits.
- A highish (35%) uplift In Building Regs with residual carbon dealt with through payments to a carbon offset fund to pay for renewable energy and energy efficiency measures elsewhere can set a dangerous 'greenwash' precedent.
- Care is needed to ensure loopholes are avoided, as avoided emissions do not reduce carbon in the atmosphere to close the impact 'gap'! Offset loopholes must be closed especially for allowable solutions where developers use carbon offsets to avoid environmental obligations
- Only permanent carbon sequestration can reduce climate change Greenhouse Gas
- Emissions and protect biodiversity and alternative approached must be strongly justified.
- Need to ensure any offsets sequester as opposed to avoid carbon!
- Incredible performance and efficiency with natural building materials can be achieved. It's all about simplicity and it's scalable. Super-sustainable development is no more expensive than traditional building, and with the right

	<p>level of material recycling so much can be achieved to offset the rising cost of new materials.</p> <p>5. Protection of Mature Trees</p> <ul style="list-style-type: none"> • A complementary policy to protecting Veteran trees is needed in the face of the environmental crises. • This SPD could be combined with Nature-based Solutions 	
ANON-KSAR-NK29-N	<p>Foreword – The Biodiversity Crisis is concurrent and interdependent with the Climate Crisis, and should be referenced alongside the Climate Change crisis. Both crises need to be front and centre of the Local Plan to ensure all policies - actual or emerging - are considered for all place making decisions for people, communities and nature. Planning and designing for carbon neutrality and adapting to Climate Change needs to include considerations of nature-based solutions and explicitly whole life carbon. A change to mitigate/adapt to Climate Change has consequences for Biodiversity and vice versa.</p>	Moved to CN and NE
ANON-KSAR-NKDW-5	<p>There does not seem to be an area for general comments in this consultation:-</p> <p>The document is very long and would benefit from being edited to produce a more concise document, especially for ease of public accessibility. Additionally, many of the maps do not have a key which makes them difficult to understand.</p>	Moved to consultation
ANON-KSAR-N8UH-M	<p>You have omitted to include the obvious policy which this Council has adopted for the whole of its tenure - i.e. No matter what the residents want to achieve for their town, you will continue to follow your own agendas and do exactly what you want. In the 35 years I have lived in Winchester, the Council has allowed developers and 'alleged' further educational institutions to destroy the sole of the city and you will continue to do so until it becomes Basingstoke No 2.</p>	Moved to consultation
ANON-KSAR-NKXV-R	<p>There is no policy on Food Security or efficient Land Use</p> <p>Food Security has been shown by the situation in Ukraine to be as important as energy security. It can also have a significant effect on reducing our District's food miles and therefore make a big contribution to our desire to be carbon neutral.</p>	Moved to Missing Policies – Economy

We should be encouraging carbon sequestration through efficient and effective farming methods and encouraging our landowners to actually produce food rather than waiting for a developer to increase the value of their landholding from development.

We should also consider effective land use within our policies somewhere. Solar farms are notoriously ineffective use of agricultural land. An 85 acre site of solar panels will produce less power than one single wind turbine. We could instead use those 85 acres (if on agricultural land) for food production and sequestration of carbon. Solar panels only produce power when the country least needs it (summer and daytime). In the peak usage time of 4-7pm in the winter, it produces nothing. Battery storage only generally stores power for 1 hour and in the winter, panels would not produce sufficient excess energy for storage anyway. I would urge you to look at <https://www.solar.sheffield.ac.uk/pvlive/> and see how ineffective solar is at solving our issues of energy need.

In the House of Lords Land use in England Committee report published on 13th December 2022
(<https://committees.parliament.uk/publications/33168/documents/179645/default/>) they concluded:

"Although there are provisions within the NPPF to dissuade the development of solar farms on Best and Most Versatile land, from the evidence received we are concerned that too many exceptions are being made. We believe that a consistent policy toward encouraging the installation of solar panels on industrial, commercial and domestic buildings is needed and would negate the need for large- scale ground mounted solar farms. Alongside that, we would like to see stricter regulations put in place to prevent the development of solar farms on BMV land. We also believe onshore wind turbines still have a crucial role to play in achieving national energy self-sufficiency.

133. Energy and other large-scale infrastructure projects should be incorporated

	<p>into a land use framework. The Land Use Commission would be tasked with doing this in close cooperation with relevant bodies including the National Infrastructure Commission."</p> <p>Central government direction is towards the development of a proper land use framework.</p>	
ANON-KSAR-N8V6-3	I object to the sale of the River Park site to Southampton University / Art College This are should be retained for public use.	Moved to Winchester allocations
ANON-KSAR-N83W-1	<p>INFRASTRUCTURE DELIVERY</p> <p>There are lots of mentions in the plan of the need to ensure there is infrastructure capacity to meet the requirements of existing communities and of new development, and yet there is no single policy in the Local Plan that explicitly gives policy support to the provision of necessary new infrastructure to meet existing and future needs, and recognises the role of the Local Planning Authority in positively determining planning applications for such development. This is an omission that should be addressed.</p>	Moved to Homes for all
BHLF-KSAR-N869-6	<p>University Policy Introduction</p> <p>There is currently no University specific policy outlined within the Local Plan. High quality educational institutions are an important element in improving the educational, economic, and cultural life of the City and the Universities are amongst the largest employers in the City. Both Universities are seeking to secure the safeguarding of their campuses for their continued use and development for educational purposes, as such the Universities propose the inclusion of a University specific policy which would seek to embed the retention and development of the Universities within the City.</p> <p>Proposed Text</p>	Comments noted. Whilst the city council is supportive and recognises the extremely valuable contribution that the Universities in the play, there considered to be no specific need to safeguard the University campuses in a Local Plan policy. There are a range of Development Management policies in the Reg 19 Local Plan that any application for the intensification of the

	<p>In accordance with the commentary outlined above, the Universities propose the following Policy wording (denoted in <i>red</i>).</p> <p><i>Policy XX - Universities (Academic Related Development)</i></p> <p><i>The existing campuses of the University of Southampton and the University of Winchester (as shown on the policies map) will be safeguarded for academic buildings and spaces which accommodate learning, teaching, research, training, sport, and fitness (indoor and outdoor), student support related uses and other facilities compatible with and linked to wider academic uses including office spaces for facilitating relationships with businesses and providing incubator space.</i></p> <p><i>The Council will support proposals for (re)development and intensification of use at these sites, where the proposals meet the principles and policies outlined within the Local Plan.</i></p> <p>It is considered that the above policy wording provides the required comfort and flexibility for the Universities to continue to deliver high quality 21st Century educational institutions within the City.</p> <p>Both Universities would seek to work closely with the City Council beyond this consultation to ensure that the full areas of all academic and residential campuses are captured in the Policy Maps to be included in the adopted Local Plan. The University of Southampton's indicative safeguarded campus and residence's locations are shown at Appendix 1 with the University of Winchester's respective estate at Appendix 2 of this Representation Document.</p>	<p>University sites would be assessed against.</p> <p>Recommended Response: No Change.</p>
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ANON- KSAR- N8XT-3	<p>The policy missing is</p> <p>Listening to village councillors and parishioners and changing this document accordingly.</p> <p>A number of submissions have been made and have been completely ignored.</p> <p>The Sheela document is flawed and cannot be relied upon .</p> <p>This whole process has been a disappointment .</p> <p><i>When will Winchester become a number one desirable place to live again this should be a policy.</i></p>	<p>Moved to consultation process</p>
ANON- KSAR- NK65-N	<p>Correction to SH2 as explained above.</p>	<p>Moved to vision and objectives</p>
ANON- KSAR- NK29-N	<p>Monitoring Framework – Alongside monitoring the individual policies there should be a requirement to produce an annual monitoring report on the overall environment to ensure it is achieving the necessary carbon reductions and biodiversity protections. Including indicators such as an audit of charging points, numbers of people cycling or walking, modes of transport used, renewable energy generation, air quality etc. to indicate levels of success. Also, a statement to explain how the Council will engage with communities, businesses & organisations in the planning process to address any issues identified.</p>	<p>Moved to monitoring</p>
ANON- KSAR- NKDW-5	<p>There does not seem to be an area for general comments in this consultation:-</p> <p>Littleton and Harestock Parish Council make our comments in good faith and trust that they will be considered in that way so that together we can safeguard and enhance the quality of our parish and the wider city given the many challenges that we face in the coming years.</p>	<p>Moved to Introduction</p>

<p>BHLF-KSAR-N8TT-Y</p>	<p>Omissions: continuing studies. In several places (paragraph 10.19 for example) reference is made to ongoing studies that may result in further changes prior to the submission version of the Plan Surely some indication ought to have been provided at this stage as to whether these changes were likely or not to be substantive? On the one hand there would seem little point now in spending time and effort scrutinising the plan if it is likely to be changed: on the other hand the plan would be shown to have limited robustness if these studies did result in significant changes.</p> <p>Omissions: policies to manage development and change in existing urban areas. The document advises that the submitted plan will promote a pattern of social, economic and environmental development and change to achieve the vision for the District. If that is so it would benefit if it showed the main land uses in urban areas: what are the limits of town centres, where are community uses (education, health etc.) and what policies would be applied to managed their development as they react to changing pressures and demands. There are a wealth of policies covering conservation the landscape and other 'environmental' matters but few for the suburban areas where most people live and go about their daily business.</p>	<p>Moved to Introduction</p>
<p>ANON-KSAR-NKXV-R</p>	<p>A policy with regards to the ethical sourcing of materials within our District.</p> <p>I believe that we ought to have a policy that requires all large scale developments to provide evidence that they are not using slave labour within their supply chains.</p> <p>This stems from the astonishing and horrifying fact that around 97% of all solar panel manufacturing is likely to be linked at some point during its manufacturing process to the use of Uyghur forced labour - and our Draft Local Plan's commitment to increase solar provision in the district by so great an amount. We must not allow our policy in Winchester to drive this terrible trade in human life.</p> <p>Evidence of this is reported in the news and podcast below:</p>	<p>Moved to CN</p>

<https://www.theguardian.com/environment/2022/nov/29/evidence-grows-of-forced-labour-and-slavery-in-production-of-solar-panels-wind-turbines>

<https://open.spotify.com/episode/7rUvj0ogd1tAoYvvRyzqmc>

We note also that the Ministry of Justice only this year cancelled the planned installation of solar panels to prison rooftops because it had concerns about the supply chain.

<https://www.thetimes.co.uk/article/dominic-raab-rips-up-solar-contract-linked-to-ughur-slavery-xk5jr2ngz>

Issues of slave and child labour are also significant with regards to Lithium mining and the creation of large batteries.