

Missing policy - Carbon Neutrality and Designing for Low Carbon Infrastructure

Respondent number	Comment	Officer comment
ANON-KSAR-NKDG-N	<p>A Policy to designate Local Green Spaces should be added. The Council should undertake consultation to allow communities to put forward proposals for land to be designated as Local Green Spaces and these proposals should be assessed on the basis of the criteria a - c as set out in paragraph 102 of the NPPF - set out below:</p> <p>The NPPF states:</p> <p>The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.</p> <p>102. The Local Green Space designation should only be used where the green space is:</p> <p>a) in reasonably close proximity to the community it serves;</p> <p>b) demonstrably special to a local community and holds a particular local significance, for example because of</p>	<p>The Local Plan has a Policy NE10 on Protecting Open Space. No new information has come forward through the consultation process to demonstrate the need to identify any areas of land at Local Green Space.</p> <p>Recommended Change: No change.</p>

	<p>its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</p> <p>c) local in character and is not an extensive tract of land.</p> <p>This policy is necessary because it will provide a higher level of protection than that proposed for open areas as set out in Policy NE10.</p>	
<p>ANON-KSAR-NKKV-B</p>	<p>Two policies:</p> <p>1. The council must encourage retrofitting to LETI standards and retrofit training and set up a vehicle for local investors to invest in retrofitting enterprises.</p> <p>2. Livestock farming currently contributes around 15% of greenhouse gas emissions in the Winchester District. All applications for the use of land to raise livestock must be considered in this context.</p>	<p>Retrofitting in relation to the LETI energy efficiency policy was discussed with the Consultants as part of the evidence base that informed Policy CN3. However, it would not be reasonable to request that an applicant meets the LETI energy efficiency measures if for example, if it only involved putting an addition onto a property. Setting up a training is beyond the remit of the city council.</p> <p>Points note but this beyond the scope of the Local Plan.</p> <p>Recommended Response: No Change.</p>
<p>ANON-KSAR-N88Q-Z</p>	<p>15 minute neighbourhoods is an excellent policy but it is only about Transport.</p> <p>Transport should be its own Policy which would allow you to expand some of the policies and 'Sustainable Living' should include 15 minute neighbourhoods with new policies on the role of food in creating healthy communities. (See NPPF which says that planning</p>	<p>The concept of 15 minute neighbourhoods has been replaced with 20 minute neighbourhoods. It is important that the Local Plan (in particular policies T1 – T4) is read as whole. There are other policies in the LP that deal with high quality well designed place and living well and a separate topic on Carbon neutrality.</p> <p>Recommended Response: No Change.</p>

	<p>policies should aim to achieve healthy, safe and inclusive places with access to local shops, healthier food etc.) This new policy should also include policies around active travel in rural areas and climate change mitigation.</p>	
<p>ANON-KSAR-NKXV-R</p>	<p>There is no policy on creating a carbon sink and allocating land for that purpose. SDNP has done this: https://www.southdowns.gov.uk/major-tree-planting-under-way-as-new-research-reveals-potential-to-create-massive-carbon-sink-in-south-downs/</p> <p>As a district, we should be doing the same. This is a long term strategic policy relating to land use. It will help us to improve the carbon sequestration of existing fallow land, can generate additional income for landowners (through the creation of carbon credits) and will improve biodiversity and habitats for the District.</p>	<p>Points noted. However, no evidence has been put forward on the need for this policy – the Local Plan does encourage tree planting and from looking at the SDNPA website this is a separate initiative that stands outside of the Local Plan.</p> <p>Recommended Response: No Change.</p>
<p>ANON-KSAR-N8VY-6</p>	<p>See my comments on policy W11 and especially “fair and reasonable balance between current residents and corporate entities seeking new development on a medium and large scale, including demolition of residential properties, and the practice of “land banking”...allowing usable properties to deteriorate unoccupied over years.</p>	<p>Points noted. There is now a new Local Plan policy on embodied carbon. The city council does not have any control on land banking and this is outside the remit of the Local Plan.</p> <p>Recommended Response: No Change.</p>
<p>ANON-KSAR-N85N-T</p>	<p>15 minute neighbourhoods are a good idea, but make the developer provide local food shops within each new build community to reduce the carbon foot print.</p>	<p>The concept of 15 minute neighbourhoods has been replaced with 20 minute neighbourhoods. It is important that the Local Plan (in particular policies T1 – T4) is read as whole.</p>

Comments moved from other missing policy

<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> <ol style="list-style-type: none"> 1.) Protection of Mature Trees 2.) Land for offsetting <ul style="list-style-type: none"> - Link to Nature based Solutions SPD. 3.) Climate Change and Sustainable Construction Supplementary Planning Document (SPD). <ul style="list-style-type: none"> - Suggest creating something similar to: download (easthants.gov.uk) 4.) Nature-based Solution <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>This is covered by Policy NE15.</p> <p>Nature based solutions has now been woven into a number of Local Plan policies.</p> <p>The Council is waiting for Government to publish secondary legislation that will clarify the role and status of Supplementary Plans (which is the new terminology for documents that were previously called Supplementary Planning Documents). A decision on the SPD's can only happen when the secondary legislation and related government guidance has been published and when the new Local Plan is adopted.</p> <p>The need for any Technical Advice Notes will be reviewed once the Local Plan has been adopted.</p> <p>Recommended Response: No Change.</p>
<p>ANON-KSAR-N819-1</p>	<p>Exactly as ANON-KSAR-NKZ5-S with the addition of the below:</p> <ol style="list-style-type: none"> 5.) Whole-Life Carbon 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 	<p>Points noted. There is a new policy on Embodied Carbon in the Reg 19 LP (Policy CN8).</p> <p>Once the new Local Plan has been adopted, all of the policies will be monitored in the city council's Authorities Monitoring Report which is published at the end of each year. The city council is looking at digital agenda and</p>

	<p>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?</p> <p>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. This 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>how it can use digital technology in the future as part of its work on TC25.</p> <p>Recommended Response: No Change</p>
<p>ANON-KSAR-NK29-N</p>	<p>As above, but copied in full as provides more detail 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>1. Supporting renewable energy in the Local Plan</p> <ul style="list-style-type: none"> • 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) <p>o to support solar farms, wind farms, energy storage</p>	<p>The Council is waiting for Government to publish secondary legislation that will clarify the role and status of Supplementary Plans (which is the new terminology for documents that were previously called Supplementary Planning Documents). A decision on the SPD's can only happen when the secondary legislation and related government guidance has been published and when the new Local Plan is adopted.</p> <p>Nature based solutions has been woven into a number of policies in the Reg 19 LP. It is important that LP is read as a whole as there are policies on Blue/Green Infrastructure (Policy NE4), Flooding and Flood risk</p>

	<p>facilities, anaerobic digestors</p> <ul style="list-style-type: none"> 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. <p>2. Nature based Solutions - green ratio and biodiversity/ecosystem services</p> <ul style="list-style-type: none"> • 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. <ul style="list-style-type: none"> o For example, London Energy Transformation Initiative (LETI) – Embodied Energy Carbon Primer - App.8 - Materials guide 252d09_8ceffcbcafdb43cf8a19ab9af5073b92.pdf (leti.uk) + WinACC SuperHomes advice note: 'Choosing nature based building products and materials' o Urban opportunities should not be overlooked 	<p>(Policy NE6). Policy CN3 is based on the LETI energy efficiency standards</p> <p>See above comments.</p>
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<p>IGNITION - Greater Manchester Combined Authority (greatermanchester-ca.gov.uk)</p> <ul style="list-style-type: none">• Nature recovery is as crucial to our wellbeing as the elimination of carbon emissions and adaptation to changed climate. <p>3. Climate Change and Sustainable Construction Supplementary Planning Document (SPD).</p> <ul style="list-style-type: none">• Suggest creating something similar to: download (easthants.gov.uk)• To include Energiesprong UK for Whole Building Retrofits at scale and speed. <p>4. Land for offsetting</p> <ul style="list-style-type: none">• 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	<p>Policy NE15 deals with important Trees. Recommended Response: No Change</p>
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	<p>obligations</p> <ul style="list-style-type: none"> • 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 level of material recycling so much can be achieved to offset the rising cost of new materials. <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 	
<p>ANON-KSAR-NK29-N</p>	<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 polices - 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>	<p>The nature emergency is now referred to in the Reg 19 Local Plan. Nature-based solutions has now been woven into a number of policies in the Local Plan. There is a now a new policy on Embodied Carbon (Policy CN8).</p> <p>Recommended Response: No Change</p>

<p>ANON-KSAR-NKXV-R</p>	<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> <p>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.</p> <p>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.</p> <p>In the House of Lords Land use in England Committee report published on 13th December 2022</p>	<p>Points noted. However, food security is beyond the remit of the Local Plan. Policy CN1 includes a criteria on supporting opportunities for local food growing and composting. Farming methods are beyond the remit of the Local Plan.</p> <p>The wording of Policy CN5 has been reworded in light of representations. Since this representation was submitted there has been a change in government administration and we are awaiting further changes to the NPPF.</p> <p>Recommended Response: No Change</p>
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	<p>(https://committees.parliament.uk/publications/33168/documents/179645/default/) they concluded:</p> <p>"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.</p> <p>133. Energy and other large-scale infrastructure projects should be incorporated 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>	
<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>Points noted. However, this is beyond the remit of the Local Plan. Recommended Response: No Change</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.

Evidence of this is reported in the news and podcast below:

<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/7rUvj0ogd1tAoYvwRyzqmc>

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-uighur-slavery-xk5jr2ngz>

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