

### Consultation comments on SP3 – Development in the Countryside

- Support - 27
- Object - 28
- Neither support or object - 9

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.

<b>Comments in support of SP3 – development in the countryside</b>		
<b>Respondent number</b>	<b>Comment</b>	<b>Officer comment</b>
BHLF-KSAR-N8TB-D ANON-KSAR-N856-2 BHLF-KSAR-N87J-R BHLF-KSAR-N8TG-J	<b>Balancing conservation and development needs</b> Recognises the challenge of protecting the countryside while accommodating growth near settlements or in sustainable locations with good access to public transport. Specific concerns regarding impacts of Mill Lane sports proposals Suggestion that the policy state that current farm land should not be used for development given it's importance to food supply.	Comments are noted. Comments on Mill Lane are noted, though this proposal is the subject of a planning consent and Policy WK1 of this Plan. It is not considered appropriate to make specific reference to Mill Lane in this policy. Whilst the need for farm land to produce food, the plan also needs to ensure that other development needs, including housing, are met. Certain policies in the Plan do give specific consideration to the best and most versatile agricultural land.
ANON-KSAR-N856-2 BHLF-KSAR-N87J-R BHLF-KSAR-N8TG-J	<b>Environmental and rural character preservation</b> Stresses careful management of countryside developments to preserve landscapes and rural character while allowing for community growth.	Comments noted.
ANON-KSAR-NK6N-E BHLF-KSAR-N8TG-J ANON-KSAR-N856-2	<b>Infrastructure and transportation impact</b> Concern 15 minute city principles are not deliverable across the Plan area	It is accepted that 15 minute city principles cannot be delivered to the same extent across the plan area. But the principle remains appropriate, with the aim of

BHLF-KSAR-N8TB-D	<p>Support for footnote setting out considerations for assessing sustainability and accessibility of rural proposals.</p> <p>Raises concerns about increased car use and its impacts unless public transport and active travel options improve.</p> <p>Suggested that traffic impacts are zero carbon through offsetting.</p>	<p>reducing the need to travel to access services. The wording throughout the Plan has been updated to refer to 20 minute neighbourhoods, in line with the County Transport Plan LTP4. This better reflects what is trying to be achieved.</p> <p>Whilst desirable, zero carbon transport goes beyond the remit of the Plan to secure, though the measures included in this will help.</p>
ANON-KSAR-NKF6-6	<p>The word " inappropriate" in the last sentence "or create inappropriate noise/light and traffic generation" is ambiguous and should be removed completely,</p>	<p>Agreed wording should be amended.</p> <p><b>Proposed Response:</b></p> <p>Amend final paragraph of policy SP3 as follows –</p> <p>Development proposed in accordance with this policy should not cause harm to biodiversity and the water environment, to the character and landscape of the area or neighbouring uses, or create <u>inappropriate unacceptable</u> noise/light and traffic generation.</p>
ANON-KSAR-NKDW-5 Littleton and Harestock Parish Council	<p>The policy seeks to restrict development to that which has a need to be located in the countryside. It is a key policy for managing development proposals outside of defined settlement boundaries. The Parish Council considers that the countryside is one of the district's most important assets and any development should be fully justified. The Parish Council supports the policy.</p> <p>Support Policy SP3</p>	<p>Noted.</p>

<p>ANON-KSAR-N8X5-4 The Dever Society</p>	<p>The Dever Society supports the third bullet in paragraph 3.5 that development will be delivered to achieve the following outcome: "The market towns and rural villages will remain attractive settlements, accommodating changes to support evolving communities and the economy, with modest growth to meet their needs underpinning the resilience of local services and facilities whilst retaining their individual identity, historic assets and rural character."</p> <p>Policy SP3 is very important in terms of safeguarding the countryside from inappropriate development that would overwhelm existing communities and destroy landscape and rural character.</p>	<p>Noted</p>
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<b>Comments which neither support or object to Policy SP3 – Development in the countryside</b>		
<b>Respondent number</b>	<b>Comment</b>	<b>Officer comment</b>
<p>ANON-KSAR-NKZU-S</p>	<p>Subsection (v) should replace the word 'exceptional' with 'justified through a robust evidence base of need'.</p> <p>A further subsection (vi) should be inserted to specifically include the delivery of 'self-custom build' dwellings.</p>	<p>Agreed amend criterion iii of policy SP3 as follows –</p> <p>v. Residential accommodation for which an exceptional need has been demonstrated <u>through a needs assessment</u>, in accordance with policies H7 (affordable housing exception sites), H12 and H13 (traveller accommodation), or H11 (agricultural dwellings).</p>

		It is not considered necessary to include a specific criterion for self or custom build homes.
ANON-KSAR-NKXA-3	<p>Draft Policy SP3 (Development in the Countryside) would only allow certain types of development outside of settlement boundaries. This includes development relating to outdoor recreation, reuse of existing building for tourist accommodation, the expansion or suitable replacement of existing buildings to facilitate the expansion of established businesses including to meet operational needs, small scale sites for tourist accommodation, residential accommodation where there is an exceptional need. The Club welcomes the allowances made for tourism development and recreational uses in the countryside, and is supportive of this policy in principle. However, further detail is required within the policy wording to provide the level of comfort our client needs to ensure they will be able to meet and respond to future demands and of their users.</p> <p>This policy should include an additional subsection in which glamping, pods and lodges are supported, as are ancillary uses such as, shower blocks, storage areas, reception buildings, and storage areas where they are of an appropriate scale and design. Such ancillary development allows the Club to continue to provide the level of service which their members require and expect, and</p>	The comments are acknowledged. Recreation and tourism uses are already acknowledged in policies SP3 and E11. There is concern that a large scale tourism development may not be appropriate in all locations and hence policy SP3 contains criterion iii. It is considered that the current approach provides a, appropriate framework for balancing economic growth with potential impacts to features such as rural character.

	<p>ensures adaptability in the face of changing market trends and customer requirements</p>	
<p>ANON-KSAR-N8U2-X</p>	<p>We note the approach within Policy SP3 to direct development within settlement boundaries. With reference to Sir John Moore Barracks, we consider that Policy SP3 should be amended as follows to ensure that there is no conflict with Policy W2 noting that the supporting text to this policy confirms that it is intended to review settlement boundaries in relation to this site in due course, once planning permission is granted for its redevelopment:</p> <p>In the countryside, defined as land outside the settlement boundaries, the Local Planning Authority will only permit the following types of development:</p> <p>i) Development in accordance with Site Allocations as set out in this Plan.</p> <p>With regard to Policy SP3, we also consider that the following wording should be added to the supporting text of this policy (which is already contained within the supporting text to Policy W2 (Paragraph 12.20)):</p> <p>With regard to Sir John Moore Barracks which is the subject of Policy W2, the site is currently located outside of the settlement boundaries of Littleton and Winchester in an</p>	<p>Agree it would be helpful to confirm the status of allocations where they do not fall within the proposed settlement boundaries.</p> <p><b>Proposed change –</b></p> <p>Insert new criterion i –</p> <p>i. <b><u>Development in accordance with Site Allocations as set out in this Plan or any made Neighbourhood Plans.</u></b></p> <p>It would also be helpful to clarify when the settlement boundary will be redrawn for those developments such as Sir John Moore Barracks and Bushfield Camp. It is considered helpful to confirm the position as follows –</p> <p><b>Proposed Change</b></p> <p>New paragraph to follow 3.13</p> <p><u>For those development allocations which fall outside of the existing settlement boundaries, it is envisaged that future iterations of the Local Plan will set out where the boundary will be amended following a masterplan and planning application process.</u></p>

	<p>area of countryside and it is not proposed to change the designation of the land at this point. Similar to the approach that the city council took with the Barton Farm Major Development Allocation, the settlement boundary would only be amended once a planning application had been approved to redevelop the site as currently the exact type, distribution and location of the development within the site being allocated has not yet been defined through the master planning process.</p>	
BHLF-KSAR-N8TJ-N	<p>Morn Hill Caravan and Motorhome Club Campsite, is located within South Down National Park, which is covered by its own Local Plan, for completeness, and noting that the site falls within Winchester City Council boundary, we have made representations to Winchester City Council's draft Local Plan.</p> <p>The Club would like to have the option of establishing storage adjacent to the main site, in addition to establishing glamping, lodges and pods on site.</p>	<p>The site falls within the South Downs National Park and as such the Local Plan does not cover this area. But it is considered that the local plan provides an appropriate framework for considering camping and associated development within the Plan area.</p>
BHLF-KSAR-N8Z7-8 South Downs National Park Authority	<p>The SDNPA welcomes Objective (vii) to support the cultural, visitor and tourism economy, including links and access to destinations including Winchester City and the SDNP. Furthermore, the SDNPA also welcomes the proposed spatial distribution of economic growth as set out in Policy E2, along with the emphasis to re-use and re-</p>	<p>Noted.</p>

	develop existing buildings in the countryside for employment and tourism purposes (where appropriate) over general housing provision as set out in Policy SP3.	
BHLF-KSAR-N8BR-B	<p>We note the approach within Policy SP3 to direct development within settlement boundaries. With reference to Sir John Moore Barracks, we consider that Policy SP3 should be amended as follows to ensure that there is no conflict with Policy W2 noting that the supporting text to this policy confirms that it is intended to review settlement boundaries in relation to this site in due course, once planning permission is granted for its redevelopment:</p> <p>In the countryside, defined as land outside the settlement boundaries, the Local Planning Authority will only permit the following types of development:</p> <p>i) Development in accordance with Site Allocations as set out in this Plan.</p>	<p>Agree it would be helpful to confirm the status of allocations where they do not fall within the proposed settlement boundaries.</p> <p><b>Proposed change –</b></p> <p>Insert new criterion i –</p> <p>ii. <b><u>Development in accordance with Site Allocations as set out in this Plan or any made Neighbourhood Plans.</u></b></p>
BHLF-KSAR-N86F-K Natural England	<p>Strategic Policy SP3 Development in the Countryside</p> <p>Natural England recommends this policy also has regard to soils, and that the benefits of protecting the Best and Most Versatile (BMV) agricultural land are considered against the need for development.</p> <p>The National Planning Policy Framework sets out that:</p> <p>‘Plans should: distinguish between the</p>	<p>Certain policies in the Plan do give specific consideration to the best and most versatile agricultural land. Soils are discussed in the Natural Environment chapter. It is not considered that it is appropriate or necessary to include additional measures in the policy to address soils.</p>

	<p>hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework<sup>1</sup>; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.'</p> <p>1 Where significant development of agricultural land is demonstrated to be necessary; areas of poorer quality land should be preferred to those of a higher quality.</p> <p>It is recommended that this Policy gives appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character, and the sustainability of the many ecosystem services they deliver. The plan should safeguard the long-term capability of BMV agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future.</p> <p>Where site allocations are sited on BMV land, the Plan should outline a requirement for the protection of soils during construction where possible,</p>	
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<b>Comments which object to Policy SP3 – development in the countryside</b>		
<b>Respondent number</b>	<b>Comment</b>	<b>Officer comment</b>
ANON-KSAR-NKB5-1 ANON-KSAR-N81F-E ANON-KSAR-N81T-V BHLF-KSAR-N8B2-B BHLF-KSAR-N8ZV-7 ANON-KSAR-NKZ5-S BHLF-KSAR-N8BS-C ANON-KSAR-NKYT-Q ANON-KSAR-NKQB-W BHLF-KSAR-N86N-U ANON-KSAR-NK2C-Y ANON-KSAR-NK21-D ANON-KSAR-NKXV-R ANON-KSAR-N8YM-W BHLF-KSAR-N8T1-V ANON-KSAR-NK4H-6 ANON-KSAR-NKUC-2	<p><b>Policy Consistency and Flexibility</b></p> <p>Policy perceived as contradicting the national planning framework and overly restrictive; calls for inclusive and adaptable approaches to renewable energy, residential infilling, and reuse of buildings in the countryside; suggestions to revise policy language to remove subjectivity. “Low key” is undefined. The policy should allow the potential for limited infilling. One respondent thought adopted policy MTRA4 was better. Support for custom build housing. Concern that criterion v will lead to a significant increase in development Seeking new flexibility to accommodate opportunities as they arise, for instance including residential development in on the edge of settlement locations. Difference to the NPPF was highlighted.</p>	<p>The policy follows a similar approach to adopted policy MTRA4. In the previous Examination, the Inspector concluded that on balance the case for a particular policy approach which differs from national policy to limited degree is sound. Those circumstances still apply and so the approach is broadly followed in SP3, subject to some minor updating and recognition of the other policies and mechanisms by which development in the countryside is may be considered.</p> <p>It is not considered appropriate for the policy to include a general permission for sites outside of the settlement boundary for development, including self build housing. It is considered that SP3 and the policies referenced within it provide a suitable framework, providing certainty for communities along with some flexibility where appropriate. The policy is broadly similar to that of adopted Policy MTRA4 and the experience of which has reduced concerns that it is overly subjective or difficult to apply in a consistent manner.</p> <p>Agree policy should reflect the potential for infilling, as this is a clear outcome of policy H4.</p> <p><b>Proposed change:</b></p> <p>Add new criterion to Policy SP3 –</p>

		<p><b><u>viii. The infilling of existing settlements without a settlement boundary in line with policy H4.</u></b></p> <p>In addition, some minor wording changes are considered appropriate to better detail how impacts will be assessed.</p> <p><b>Proposed Change:</b></p> <p>Amend final paragraph of Policy SP3 as follows -</p> <p>Development proposed in accordance with this policy should not cause <b>unacceptable</b> harm to biodiversity and the water environment, to the character and landscape of the area or neighbouring uses, or create inappropriate <b>unacceptable</b> noise/light and traffic generation.</p>
<p>ANON-KSAR-N8XZ-9 ANON-KSAR-N8GX-P ANON-KSAR-NKQB-W</p>	<p><b>Travellers and Exceptional Need</b> Concerns policy implies a presumption that traveller accommodation will be permitted.</p>	<p>It is not intended or anticipated that the policy will lead to a presumption that traveller accommodation will be permitted in the countryside. But it is considered correct for the policy to accurately reflect the mechanism and policies under which development may come forward which may ultimately lead to the settlement boundary being revised. Therefore the criteria identify those polices.</p>
<p>BHLF-KSAR-N8BS-C ANON-KSAR-NKQB-W</p>	<p><b>Strategic Planning and Location Suitability</b></p>	<p>Detailed comments on the settlement hierarchy and the presence of facilities in South Wonston are set out in</p>

<p>ANON-KSAR-NK3F-3 ANON-KSAR-NKB5-1 ANON-KSAR-N81F-E ANON-KSAR-NK2C-Y ANON-KSAR-NKJ1-5 BHLF-KSAR-N8ZV-7 ANON-KSAR-NKXV-R ANON-KSAR-N8GX-P ANON-KSAR-NKAP-U ANON-KSAR-N8YM-W ANON-KSAR-NKJX-C</p>	<p>Discussions on the suitability of policy SP3's strategic planning approach and location choices for development; need for sustainability and a land use allocation plan; challenges mentioned for rural villages without mains drainage. Objections raised to proposed allocation in South Wonston, references to the settlement hierarchy, impacts of development, and justification of approach. Promotion of land at Fairthorn Grange, land at Salters Lane, Land at Lovedon Lane, Better liaison with South Down NPA to ensure adjacent areas are protected.</p>	<p>the responses to that evidence base document. The rationale for the selection of a site in South Wonston for development is set out in the Development Strategy and Site Section Background Paper, which also explains how the strategy has been applied to other settlements. If it is considered appropriate to allocate site(s) for development in a settlement, then development in a neighbouring settlement is relevant, but not a substitute for that growth. The approach to the selection of sites is set out in the Development Strategy and Site Selection Background Paper. The Plan has been the subject of significant cross boundary discussion with the South Down National Park Authority, with progress and agreements set out in a Statement of Common Ground.</p>
<p>ANON-KSAR-NK3F-3 ANON-KSAR-NKB5-1 ANON-KSAR-NK21-D ANON-KSAR-NKXV-R ANON-KSAR-NKYT-Q ANON-KSAR-NKQB-W</p>	<p><b>Protecting Rural Character and Biodiversity</b> Concerns over landscape damage, loss of biodiversity, and increased noise and traffic impacts; emphasis on the need for development policy that protects rural qualities; support for developments that meet operational countryside needs and enhance rural character.</p>	<p>Comments are noted. The Plan should be read as a whole and it is considered that policies including D1, D4, and the transport and natural environment chapter do provide a suitable approach to address these issues and do not need repeating in this policy.</p>
<p>ANON-KSAR-NKDM-U ANON-KSAR-NKDG-N ANON-KSAR-NKZ5-S ANON-KSAR-N83B-C ANON-KSAR-NK2C-Y ANON-KSAR-NK1J-5 ANON-KSAR-NKXV-R ANON-KSAR-NKQB-W</p>	<p><b>Environmental Sustainability and Infrastructure</b> Balancing countryside development with environmental sustainability; challenges like sewage impact and overwhelmed systems; calls for policies promoting renewable energy development; need for improved</p>	<p>Policy CN5 addresses renewable energy schemes and makes it clear that it is envisaged some will come forward on countryside locations, setting the criteria for their consideration. An Infrastructure Delivery Plan has been prepared which identifies key infrastructure required to support the growth set out in the Plan.</p>

	infrastructure, including roads and sewage facilities.	
ANON-KSAR-NKB5-1 ANON-KSAR-NKYT-Q	<p><b>Transportation and Accessibility</b> Inadequate road systems for increased traffic from new developments; suggestions for sustainable transport options and provisions for electric vehicles.</p>	<p>The transport impacts of the proposed development strategy have been considered through the Strategic Transport Assessment which accompanies the proposed submission plan document and the initial site assessments which form an appendix to the Development Strategy and Site Selection Background Paper. Hampshire County Council as Highway Authority has not objected in principle to the allocation of sites proposed for development.</p> <p>It is not considered necessary to make specific allowance for electric vehicles in the countryside. If a countryside location is required (say , for example, at a service station located on the road network but in the countryside) then the policy already allows this to be taken into account.</p> <p>It is considered appropriate to correct a typographical error in this criterion.</p> <p><b>Proposed Change:</b></p> <p>Amend criterion iii of Policy SP3 as follows:</p> <p>...which have access to public transport, or active travel <b><u>infrastructure</u></b> and avoid the need to travel by private car...</p>
ANON-KSAR-N8GX-P ANON-KSAR-N838-2	<b>Social Housing and Community Well-being</b>	Comments are noted. The Plan should be read as a whole and it is considered that policies including D1,

<p>ANON-KSAR-NKYT-Q ANON-KSAR-NK1J-5)</p>	<p>Advocating for countryside development addressing social housing and community well-being; use of policy SP3 to allocate developments for social housing and include public open spaces; concerns about the impact on local amenities and family well-being near sewage plants. No mention of open space.</p>	<p>D4, D7 and NE13 do provide a suitable approach to address these issues and do not need repeating in this policy.</p> <p>Open space is addressed in policies NE10 and NE11 and it is considered there is no need to repeat that specific mention here.</p>
<p>ANON-KSAR-NK2C-Y Southern Water</p>	<p>Southern Water understands the desire to protect the countryside. However, we are concerned that the current wording of the above policy could create a barrier to statutory utility providers, such as Southern Water, from delivering essential infrastructure required to serve existing and planned development.</p> <p>Policy SP3 seeks to prevent development outside of settlement boundaries unless it has an operational need for a countryside location, such as for agriculture, horticulture, forestry or outdoor recreation. It is important to recognise that there may be limited options available for the location of new water or wastewater infrastructure due to the need to connect into the existing networks. The National Planning Practice Guidance (ref: 34-005-20140306) recognises this scenario and states that ‘it will be important to recognise that water and wastewater infrastructure sometimes has particular locational needs (and often</p>	<p>On balance, it is considered that certain uses such as water infrastructure and renewable energy often require a countryside location, whereas those set out in the policy always do. It is considered that the requirement for proposals to demonstrate an “operational need” for a countryside location is sufficient to enable such proposals to be considered on their merits.</p>

	<p>consists of engineering works rather than new buildings) which mean otherwise protected areas may exceptionally have to be considered'</p> <p>We therefore propose the following change to the wording of criterion 'i' of this policy to ensure that the planning and development of essential utility infrastructure (such as water supply and wastewater infrastructure) is not inadvertently precluded:</p> <p>In the countryside, defined as land outside the settlement boundaries, the Local Planning Authority will only permit the following types of development:</p> <p>i. Development which has an operational need for a countryside location, such as for agriculture, horticulture, forestry, essential infrastructure, or outdoor recreation;</p>	
ANON-KSAR-NKJ1-5 BHLF-KSAR-N8ZV-7	Winchester College request that a change to the settlement policy boundary is made to include Blackbridge Yard, College Walk, Winchester within the settlement of boundary of Winchester Town.	Blackbridge Yard lies adjacent to the settlement boundary. It is not an area identified for development and it is not considered necessary or justified to amend the boundary at this location.

Comments from other topics		
ANON-KSAR-NK21-D	<p>Object</p> <p>As drafted, SP3 is a restrictive policy. It provides for a closed list of those forms of development which are permissible in the countryside. The policy test, in the context of the closed list of acceptable</p>	The policy follows a similar approach to adopted policy MTRA4. In the previous Examination, the Inspector concluded that on balance the case for a particular

	<p>development types, is that proposals should result in nil harm to recognised interests such as biodiversity and character.</p> <p>The approach is at odds with the NPPF. The test in the NPPF is to recognise intrinsic character and beauty, in the context of no specific limit/closed list on appropriate development forms. Recognising intrinsic character and beauty does not require that development is limited to a closed list, nor that the test should be nil harm.</p> <p>Indeed, in relation to biodiversity the test is set out at NPPF paragraph 180. Here the reference is not only to allowing harm, but to avoiding harm which sits up to but does not breach the high bar test of 'significant harm'.</p> <p>The policy thus requires redrafting to fairly reflect the provisions of national policy.</p>	<p>policy approach which differs from national policy to limited degree is sound. Those circumstances still apply and so the approach is broadly followed in SP3, subject to some minor updating and recognition of the other policies and mechanisms by which development in the countryside is may be considered.</p>
<p><b>ANON-KSAR-N819-1</b></p>	<p>Para 3.2 Needs to reflect the comments above</p> <p>Page 22 – Outlined dotted box needs to to reflect the the missing reference to the dual Climate and Biodiversity crises.</p> <p>Suggest title amend:  'Tackling the climate and biodiversity emergencies and creating a greener district at the same time'.</p> <p>para 3.7 lists the Plan's objectives for tackling the climate emergency and creating a greener district. Objective vii refers to maximising the use of low carbon infrastructure and construction etc. This should be clarified to ensure that it includes renewable energy generation, Nature-based Solutions and future adoption of whole life carbon standards.</p> <p>Embodied carbon emissions make up a large fraction of the total carbon emissions from construction, often 20-50% of the whole life (embodied + operational) carbon emissions of a new building. Embodied carbon is already a considerable proportion and will only increase as the thermal standards of new buildings improve. It is also important to remember that unlike operational carbon emissions the embodied energy and carbon once 'spent' cannot be</p>	<p>All suggestions for amendments to the objectives are considered already appropriated incorporated in objectives.</p> <p>Agree the nature emergency should also be referenced. Amend the second sentence of paragraph 3.2 as follows –</p> <p>The cCouncil declared a climate emergency in 2019 <b>and a nature emergency in 2023</b>, work has taken place at a local level on a Winchester Town Vision, and local communities have commenced work on a number of neighbourhood development plans in Denmead, New Alresford, <b>and</b> Hursley along with new and updated village design statements</p>

	<p>reversed. Once released the opportunity for improvement has passed. In contrast, operational emissions in buildings can be improved at any point in the lifetime of a building, for example by implementing a range of energy efficiency measures. Embodied carbon cannot be improved. The importance of embodied carbon considerations is therefore becoming clear, and it can easily be reduced by 10-20% without increasing capital costs and should therefore be included at the outset of the design process &amp; .</p> <p>Given the above, the objectives need to include monitoring of the impacts from the concurrent and interdependent Climate and Biodiversity crises to/from the Plan. To include the amount of whole life carbon emissions reductions and the additional biodiversity net gain beyond that required through regulation from any development. Use of Nature-based solutions is need to deliver the additional benefits for both mitigation and adaptation to the crises. It is understood WCC has the flexibility to go beyond the mandatory requirements under 2012 Regulations for local authorities to decide what should be monitored.</p>	<p>Plan policy CN8 sets out proposals for development to be accompanied by an embodied carbon assessment</p>
<p><b>ANON-KSAR-NKYT-Q</b></p>	<p>The policy will need to be revised given the changes to planning laws proposed by central government and the flexibility allowed for housing development, especially as some buildings currently classified for commercial and business use could be used for mixed residential and commercial and in all cases should be re-purposed to meet all aspects of mitigating the effects of climate-change. Also to be noted that the changes likely in work/life patterns and travel should be considered when classifying and then monitoring any developments in future. Some of the data concerning these aspects, particularly commercial and travel is out-of-date and needs revision.</p>	<p>Changes in use classes and permitted development are noted but it is not considered they need result in a significant revision to this policy.</p>

**Comments which did not answer to whether they support, object or neither support or object to policy SP3 – development in the Countryside**



<b>Respondent number</b>	<b>Comment</b>	<b>Officer comment</b>
ANON-KSAR-NK29-N	SP3 – Add point vi on renewable energy generation as a type of development that will be permitted in the countryside	Renewable energy schemes do not always need to be located in the countryside. Policy CN5 provides an appropriate framework for assessing renewable and low carbon energy which applies to sites in the urban areas and the countryside and on balance it is not considered necessary to include a specific mention in this policy.

	<b>Recommendations</b>	<b>Officer response</b>
Comments from SA/HRA	<p>Recommendations SP3</p> <p>5.15 The following recommendations for the policy text are included to help mitigate any negative effects and strengthen any positive effects identified:</p> <ul style="list-style-type: none"> <li>■ Policy SP3 could include requirement for developments not to create inappropriate pollution (air and water, in addition to noise and light already included). The policy could also include more direct support for proposals that would improve the sustainable or active transport offer at rural locations and thereby help to limit the level of carbon emissions associated with travel from these locations.</li> </ul>	It is important to read the LP as whole as all of these issues are included in separate LP policies.

### **Amendments to Policy SP3**

In the countryside, defined as land outside the settlement boundaries, the Local Planning Authority will only permit the following types of development:

- i. **Development in accordance with Site Allocations as set out in this Plan or any made Neighbourhood Plans; or**

- ii. Development which has an operational need for a countryside location, such as agriculture, horticulture, forestry or outdoor recreation; or
- iii. Proposals for the reuse of existing rural buildings for employment, tourist accommodation, community use or affordable housing where they are close to existing settlements or in otherwise sustainable locations<sup>1</sup> which have access to public transport, ~~or~~ active travel **infrastructure** and avoid the need to travel by private car (to meet demonstrable local housing needs). Buildings should be of permanent construction and capable of use without major reconstruction; or
- iv. Expansion or suitable replacement of existing buildings to facilitate the expansion on-site of established businesses or to meet an operational need, provided development is proportionate to the nature and scale of the site, its setting and countryside location; or
- v. Small scale sites for low key tourist accommodation appropriate to the site, location and the setting;
- vi. Residential accommodation for which an exceptional need has been demonstrated, in accordance with policies H7 (affordable housing exception sites), H12 and H13 (traveller accommodation), or H11 (agricultural dwellings)-, **and**
- vii. **The infilling of existing settlements without a settlement boundary in line with policy H4.**

Development proposed in accordance with this policy should not cause **unacceptable** harm to biodiversity and the water environment, to the character and landscape of the area or neighbouring uses, or create ~~inappropriate~~ **unacceptable** noise/light and traffic generation.

Amendments to supporting text

New paragraph to follow 3.12

**For those development allocations which fall outside of the existing settlement boundaries, it is envisaged that future iterations of the Local Plan will set out where the boundary will be amended. This is because the precise boundaries of the development will only be determined following a masterplan and planning application process.**