

ID User 20125 – CPRE HAMPSHIRE

WINCHESTER DISTRICT LOCAL PLAN: PRE –SUBMISSION CORE STRATEGY UPDATED REPRESENTATION

This updated Representation relates to the Pre-Submission Representation made by CPRE Hampshire concerning Policies CP19 and CP20 of the Joint Core Strategy (JCS), on the subject of the natural environment and countryside. The National Planning Policy Framework replaces earlier Guidance (PPS and PPG) relating to the natural environment and countryside. Accordingly, for the sake of convenience this Updated Representation should be treated as entirely replacing the original Representation in order to reflect provisions of the NPPF which are relevant.

Representation re natural environment and countryside from CPRE Hampshire

The Joint Core Strategy is **unsound (not justified)** in that in relation to policies for the District for conservation and enhancement of the natural and built environment (Chapter 7 - High Quality Environment) it **does not adopt the most appropriate strategy, and is not consistent with the principles and policies set out in the National Planning Policy Framework**

The National Planning Policy Framework (NPPF) provides:

8to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions.

17 Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. These 12 principles are that planning should:

.....

- take account of the different roles and character of different areas, promoting the vitality of our main urban areas, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;
- contribute to conserving and enhancing the natural environment and reducing pollution....

151. Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in this Framework, including the presumption in favour of sustainable development.

156. Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:

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- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

109. The planning system should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, geological conservation interests and soils;
- recognising the wider benefits of ecosystem services;
- minimising impacts on biodiversity.....

.....

115. Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.

116. Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

In the **Joint Core Strategy** it is stated

Para 2.1 *[Winchester District] is the last densely populated in Hampshire covering some 661 square kilometres, centred around the county town of Winchester.*

Para 2.3 *The District has many special heritage characteristics with over 2000 listed buildings, more than 30 conservation areas, over 100 scheduled monuments and 10 historic parks and gardens and a registered battlefield. The natural environment is also valued with a range of designations both local, [national] and European. The tidal area of the River Hamble / Solent within the District is both a Special Area of Conservation and a Special Protection Area, and the Itchen Valley, which covers a large part of the District including the source of the River Itchen is also a Special Area of Conservation. At the more local level there are over 600 sites of importance for nature conservation and 17 Sites of Special Scientific Interest. 40.4% of the District now falls within the South Downs National Park*

Para 2.8 *The form and quality of the natural and built environment of the District is a fundamental feature and highly valued.....*

Para 2.16 Winchester Town. *The historic, cultural, aesthetic visual and nature conservation elements of Winchester and its setting are of exceptional quality.....*

Para 2.25 Market Towns and Rural Area. *This spatial area of the Winchester District includes 50 or so smaller settlements, which range from larger villages of several thousand population, to small hamlets of a few dwellings originally serving the agricultural industry. The varied nature of the settlements in this part of the District requires a strategy that will allow local communities to be realised whilst protecting the rural nature and character of the villages and surrounding countryside, many of which now lie in the South Downs National Park. In delivering the National Parks purposes the Local Planning Authorities have a duty to seek to foster the economic and social well being of the local communities within the National Park, and must meet the [statutory] purposes of the National Park.....*

Para 2.34 - Spatial Planning Objectives - High Quality Environment

- Protect and enhance Winchester District's valuable environments and wildlife assets, whether these are urban or rural areas or involve the built or natural environments. To ensure that change restores, maintains or enhances the biodiversity, landscape character and historic environment of the District as a special place.
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- Provide, protect and enhance green infrastructure to include open spaces, green links and wildlife corridors

Spatial Strategy – Winchester Town

Para 3.5there is also the widely acknowledged desire to ensure Winchester Town remains the special place that it is, both in terms of its character and setting

Para 3.6 A critical issue is how to deliver the amount and type of development required to respond to these needs, without compromising the qualities and character of the Town recognised and valued by so many. Winchester's heritage and environment are of international importance with a wealth of historic sites and buildings, and a townscape of the highest quality. Its setting is of particular importance, a defining factor is its position in the local topography, overlooked by chalk downland with ancient woodland and a variety of semi-natural habitats. The most important parts of that Towns setting are now within South Downs National Park and the River Itchen is a key component as being a fine example of a chalk stream of European significance, with species rich meadow and grassland.

Policy WT1 Development Strategy for Winchester Town

- Retention of existing and provision of new green infrastructure to ensure the Town retains its well-treed character, attractive green setting, its well defined urban edge and access to open space and adjoining countryside.

Spatial Strategy – Market Towns and Rural Areas

Para 3.64 The vision for this spatial area reflects these aspirations:
The vision for the market towns and rural areas is to support development that serves local needs in the most accessible and sustainable locations. Promotes the vitality and viability of all communities, and maintains their rural character and individual settlement identity.

Policy MTRA1 Development Strategy Market Towns and Rural Area

The spatial planning vision for Market Towns and Rural Areas will be achieved through:

.....

Development proposals which maintain and enhance important local character and retain settlement identity

Policy MTRA2 Development Strategy Market Towns and Larger Villages

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All new development should be appropriate in scale and design and conserve each settlement's historic identity, countryside setting and local features.....

Para 3.84 ***Other Settlements in the Market Town and Rural Area.** A key challenge is to allow some development to respond to local needs where appropriate and justified, whilst ensuring that this spatial area retains its overriding characteristics of being countryside with dispersed settlements of varying sizes.....*

Para 3.85 *A substantial number of the settlements that lie within the rural part of the District are also within the South Downs National Park. Where development proposals will be required to comply with national park purposes.....*

Policy MTRA3 Other Settlements in the Market Towns and Rural Area

All new development should be appropriate in scale and design and conserve each settlement's historic identity, countryside setting, and key characteristics and local features.....

Policy MTRA4 Development in the Countryside

Development proposed in accordance with this policy should not cause harm to the character and landscape of the area or neighbouring uses, or create inappropriate noise/light and traffic generations

The South Downs National Park

Para 7.48 *40.4% of the area of Winchester District now falls within the South Downs National Park. within this area the landscape is characterised by rolling downland, notably large grass and arable fields, and small pockets of woodland. The chalk Rivers Itchen and Meon flow through the area adding to the variety and form of the landscape.*

Para 7.49 *The settlements within the area have developed in a way which follows the natural forms of the landscape. The traditional vernacular buildings reflect local building styles and materials of the area. The National Park's boundary is adjacent to a number of urban areas, most notably Winchester itself and the larger settlements of New Alresford and Bishops Waltham. Development in these areas has the potential to impact on the landscape and amenity of the National Park and must be carefully managed and mitigated.*

Para 7.50 *The two statutory purposes of the South Downs National Park are:*

- to conserve and enhance the natural beauty, wildlife and cultural heritage of the area.*
- to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.*

Policy CP19 - South Downs National Park.

New development should be in keeping with the context and the setting of the landscape and settlements of the South Downs National Park. The emphasis should be on small-scale proposals that are in a sustainable location and well designed. Proposals which support the economic and social well being of the National Park and its communities will be encouraged, provided that they do not conflict with the National Park's purposes.

Large scale development within and adjoining the South Downs National Park which would have a significant detrimental impact to the rural character and setting of settlements and the landscape should not be permitted unless it can be demonstrated that the proposal is of over-riding national importance, or its impact can be mitigated.

Heritage and Landscape Character

Para 7.52 *The District has a diverse heritage which underpins its special character, including over 100 ancient monuments, 2000 listed buildings, 10 historic parks and gardens, more than 30 conservation areas and a historic battlefield which now lies within the South Downs National Park. Their retention and enhancement is essential for the conservation of the District's unique sense of place and can bring wider social, cultural, economic and environmental benefits.*

Para 7.53 *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 and the Winchester City and its Setting study, highlight the necessity for these special qualities to be retained and respected in planning for growth and change.*

Policy CP20 - Heritage and Landscape Character

The Local Planning Authority will support new development which recognises, protects and enhances the District's distinctive landscape and heritage assets. These may be designated or undesignated and include natural and man-made assets associated with existing landscape and townscape character, conservation areas, scheduled ancient monuments, the, historic parks and gardens, listed buildings, historic battlefields and archaeology. Particular emphasis should be given to conserving:

- recognised built form and designed or natural landscapes that include features and elements of natural beauty, cultural or historic importance;*
- local distinctiveness, especially in terms of characteristic materials, trees, built form and layout, tranquillity, sense of place and setting.*

Need for an overall policy to conserve and enhance the natural environment and countryside

The above statements in the JCS demonstrate that Winchester District (outside the South Hampshire Urban Areas) is **highly rural for the South East of England, containing countryside and settlements of the highest quality. The South Downs National Park covers 40.4% of the District**, which is designated for comprising of landscape, wildlife and cultural heritage of national importance.

The JCS makes very clear **the fundamental importance of the natural environment, landscape and countryside of the District**, within and without the South Downs National Park, and the setting of settlements, and sets out **strategic policy objectives to conserve and enhance these assets**.

CPRE Hampshire **fully supports the maintenance, conservation and enhancement** of the District's high quality natural environment and countryside. It is especially relevant that the South Downs National Park covers 40% of the District and much of the remaining countryside is unspoilt and locally distinctive.

NPPF provides that Local Plans must be prepared with the objective of contributing to the achievement of sustainable development, and be consistent with the principles and policies set out within it. NPPF sets out a set of core land-use planning principles which should underpin Local Plans. These include taking account of the different roles and character of different areas and recognising the intrinsic character and beauty of the countryside, and contributing to conserving and enhancing the natural environment. Local planning authorities should set out the strategic priorities for the

area in the Local Plan, to include strategic policies to deliver conservation and enhancement of the natural and historic environment, including landscape.

The statutory duty to deliver the **two statutory purposes for national parks** is well recognised in the statements in the JCS, **yet these purposes are not stated within a Policy within the JCS.**

Further, whilst a strategic priority to conserve and enhance the landscape and special characteristics of the District's natural environment is made clear in the JCS, **there is no overall policy designed to implement conservation and enhancement of the natural environment and countryside** as would be expected, and appears in Core Strategies of similar Districts, such as East Hampshire.

Without an overall policy for the conservation and enhancement of the natural environment, countryside and landscape, the Joint Core Strategy does not adopt the most appropriate strategy in relation to the natural environment and countryside, and is not consistent with the policies and principles set out in the NPPF

Further, it is not stated, but within the Market Towns and Rural Area is the **Forest of Bere** to the south, which is fine unspoilt countryside, much valued by residents and allowing countryside access to the many who live in urban areas within it and nearby, thereby saving the South Downs National Park from excessive recreational pressure. The Forest of Bere is the subject of Green Infrastructure Strategy prepared for the Partnership for Urban South Hampshire (of which Winchester City Council is a member), which includes the **Forest of Bere Land Management Initiative**, of great importance to conservation of this part of the Market Towns and Rural Area. Whilst support is given in Paragraph 7.24 (if amended by proposed Modification 122) to the PUSH Green Infrastructure Strategy, there is no mention of the Forest of Bere Land Management Initiative which covers broader countryside and landscape issues than purely green infrastructure as defined in Paragraph 7.18 of the JCS

The change CPRE Hampshire consider necessary to make the Joint Core Strategy sound and to be consistent with the policies and principles set out in the NPPF, is to **include a policy relating specifically to conservation and enhancement of the natural environment, countryside and landscape** in the following or similar words,

NATURAL ENVIRONMENT, COUNTRYSIDE AND LANDSCAPE

The special characteristics of the district's natural environment and countryside will be conserved and enhanced for the sake of its intrinsic character and beauty, the diversity of its landscapes, heritage and wildlife, the wealth of its natural resources and to ensure it may be enjoyed by all.

New development will be required to:

- **conserve and enhance the natural beauty, tranquillity, wildlife and cultural heritage of the South Downs National Park and its setting, and promote the opportunities for the understanding and enjoyment of its special qualities, and be in accordance with the ambitions within the emerging South Downs Management Plan;**

- protect and enhance local distinctiveness and sense of place by applying the principles set out in the district's Landscape Character Assessments, including Community/Parish Landscape Character Assessments;
- protect and enhance settlements in the wider landscape, land at the urban edge and green corridors extending into settlements;
- protect and enhance natural and historic features which contribute to the distinctive character of the district's landscape, such as trees, woodlands, hedgerows, soils, rivers, river corridors, ditches, ponds, ancient sunken lanes, ancient tracks, rural buildings and open areas;
- protect and enhance dark skies by minimising glare and light spillage
- protect and enhance areas of high tranquillity

In the South Downs National Park the emphasis should be on small-scale proposals that are in a sustainable location and well designed. Proposals which support the economic and social well being of the National Park and its communities will be encouraged, provided that they do not conflict with the National Park's purposes. Development within and adjoining the South Downs National Park which would have a significant detrimental impact to the rural character and setting of settlements and the landscape should not be permitted unless it can be demonstrated that the proposal is of over-riding national importance, or its impact can be mitigated.

Major developments will not be permitted in the South Downs National Park except in exceptional circumstances, as specified in national guidance

Priority will be given to working with landowners and others in order to ensure that land management practices improve public access to the countryside, conserve and enhance valued landscapes of major importance for wild flora and fauna, restore landscapes where valued features have been lost or degraded, and improve dark skies and tranquillity.

The Local Planning Authority will support and further the Forest of Bere Land Management Initiative

The above would replace CP19. CP20 to be amended as follows

Policy CP20 - Heritage Assets and Landscape Character

The Local Planning Authority will support new development which recognises, protects and enhances the District's ~~distinctive landscape and~~ heritage assets. These may be designated or undesignated and include natural and man-made assets associated with existing landscape and townscape character, conservation areas, scheduled ancient monuments, the, historic parks and gardens, listed buildings, historic battlefields and archaeology. Particular emphasis should be given to conserving:

- recognised built form and designed or natural landscapes that include features and elements of natural beauty, cultural or historic importance;

- local distinctiveness, especially in terms of characteristic materials, trees, built form and layout, tranquillity, sense of place and setting.

CPRE Hampshire
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