



nature's voice

Rosemary Morton
Programme Officer Winchester District
Local Plan Part 1
Winchester City Council

By Email only: rmorton@winchester.gov.uk

30 July 2012

Dear Ms Morton

Winchester District Local Plan Part 1

Thank-you for contacting the RSPB regarding the submission of the Winchester District Local Plan (Part 1) and the publication of the Schedule of Modifications. The RSPB has reviewed the proposed modifications and considered our previous responses to the draft Plan in light of these changes, and also in light of the National Planning Policy Framework (NPPF). We do not wish to make any further submissions in respect of the NPPF at this stage, but we would like to make the following comments in response to the Schedule of Modifications.

Schedule of Modifications

The RSPB welcomes Proposed Modification 138, which in part aims to address our objection to Policy CP21. Our objection concerned the lack of a sound basis for the introduction of developer contributions towards strategic avoidance/mitigation measures in order to protect the Solent and the New Forest SPAs.

This is in light of the ongoing research into the effects of increased recreational pressure on these European sites, which is likely to lead to the need for strategic mitigation to mitigate the effects of new housing in the surrounding area within the Plan period. In the case of the Solent, a strategic mitigation approach (including on-site access management measures around the Solent coast) is already under discussion between the Solent Local Planning Authorities.

We therefore recommended that Paragraph 7.56 includes specific reference to: "Other strategic avoidance/mitigation measures necessary to protect the European sites within and adjacent to the District". Proposed Modification 138 partly meets this request by proposing the following additional wording: "....Green infrastructure, including recreation provision and measures necessary to protect European sites".

We consider that this is a modest improvement. However, we are concerned that its meaning is obscured as a result of its inclusion as an extension to the Green Infrastructure bullet point, rather than as a standalone point. We consider that this may confuse these two distinct measures, implying that access

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management measures will relate only to the Green Infrastructure, rather than the European sites themselves. We are further concerned that the proposed modification fails to indicate that the measures may be required to protect sites (such as the New Forest Special Protection Area) which lie outside of the District.

As such, we remain concerned that the CP21 could still severely compromise the Council's ability to seek developer contributions towards the full range of mitigation and avoidance measures necessary for new housing to comply with the Habitats Regulations. We therefore refer the Inspector to our recommended wording change, as set out in our original objection to Policy CP21 (and copied above).

The RSPB's other objections in respect of Policy DS1 and Policy SH3 also still remain.

Yours sincerely

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Carrie Temple
Senior Conservation Officer