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Dear Sir/Madam

Winchester District Local Plan Part 1 – Joint Core Strategy- Submission and Proposed modifications

Thank you for informing the Trust of the submission and proposed modifications to the Winchester District Local Plan Part 1 Joint Core Strategy .

We are please to note in modification number 125, thatour requested change to CP15 on Green Infrastructure, has been changed from "contribute " towards well managed multifunctional Green Infrastructure to "provide a net gain" . We welcome this change.

We are also pleased to see the changes made to :

Modification number 129 with regards CP16 Biodiversity

Modification number 139 in respect to paragraph 7.56

Modification number 128 in respect to paragraph 7.48

We support these changes.

Regarding Modification 58 (inserting new paragraphs before policy SH3 -Strategic Housing Allocation – North Whiteley) we are pleased to see this now recognise that the Sustainability Appraisal and Habitats Regulations Assessments have identified a number of potential risks to internationally important sites and that this will require a full package of measures to be implemented.

However **the Trust still maintains its original objection to this site being allocated and still maintains that the Winchester District Local Plan Part 1 – Joint Core Strategy is unsound. The alternatives for this site have not been considered and no further details on the amount of green infrastructure that would be provided have been given .**

We welcome that Background Paper 1 (Housing Provision, Distribution and Delivery) has been produced as an attempt to demonstrate that alternative sites were considered. However, it is disappointing that this paper does not clearly show that alternative locations were fully considered in relation to the North of Whiteley site. This background paper discusses mainly housing targets and how they have been compiled. In discussing North Whiteley it states in section 5.17 that *"Clearly, with such large allocations, it is not appropriate or realistic to identify alternative sites and the Council, therefore, relies on demonstrating that these allocations will be delivered"* . The Trust disagrees with this statement .

National Planning Policy Framework (2012) states in section 152 that *"Local Planning Authorities should seek to achieve each of the Economic, Social and Environmental dimensions of sustainable development and **net gains across all three**"* and that *" Significant adverse impacts upon any of these dimensions should be avoided and **wherever possible alternative options which reduce or eliminate such impacts should be pursued"***.

We believe that North of Whiteley will not achieve a net gain in biodiversity and the significant adverse effect on both the Upper Hamble and the local Wildlife SINC's, within the proposed allocation sites, will not be avoided. These concerns have been raised to yourselves many times and within in our pre-submission response. We would therefore wish to see alternative options which reduce or eliminate these impacts be pursued . This has not happened.

We recognise that the National Planning Policy Framework has only just come in this year (2012) however Planning Policy Statements also have similar policy statements with regard to the Environment and the consideration of Alternatives.

PPS1 states that the Government sets out four aims for sustainable development and include effective protection of the environment. PPS1 further states that these aims (social economic environment and prudent use natural resources) *" should be pursued in an integrated way"* . (PPS1 section 4) and that *"local planning authorities should ensure that development plans promote outcomes in which environmental, economic and social objectives are achieved together over time"* . (PPS1 Key Principle 13 i) . PPS1 then goes on further to state that *"**significant adverse impacts on the environment should be avoided and alternative options which might reduce or eliminate these impacts should be pursued"*** PPS3 also backs this up with stating that *"Local planning authorities should set out the criteria to be used in identifying broad locations and specific sites taking into account any physical*

environmental, land ownership land use investments constraints or risks associated with broad locations or specific sites such asthe need to protect natural resources eg water and biodiversity" .

We are concerned that the consideration for alternative locations has not been fully assessed and that Winchester Housing technical paper (2011) has assessed housing only in relation to housing supply and targets and not in an integrated way taking the Environment into account.

We are concerned that in section 9.3 of the Housing technical paper it states that "*The Council has resolved to confirm its support for the updated PUSH economic strategy and to allocate major housing sites at North Whiteley and West of Waterlooville*". The 2012 Background Paper 1 also confirms its support to the Push Economic strategy.

The Wildlife Trust believes that the Push Economic strategy is unsound as it has not gone through any formal public consultation, or Examination in Public, nor has it had a Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA) .

As this strategy is clearly a plan or project we believe that this fails to meet the requirements of the Conservation of Habitats and Species regulations 2010 and the SEA Directive (European Directive 2001/42/EC.)

Whilst it is recognised that an Sustainability Appraisal has been undertaken for the housing technical paper (shown in appendix x of the background paper 1) it is noted that this has concluded that "*The nature and significance of any potential effects (negative and positive) of development on the environment depends upon the characteristics and sensitivities of the receiving locations*" (section 3.10). No such strategic assessment of North of Whitley has been made to our knowledge.

In addition to our concerns over alternative locations we also raised concerns and objections to the policy regarding the lack of detailed information regarding any proposed green infrastructure. It is disappointing to note that this still has not been provided in the proposed modifications.

Regarding Modification number 30 It is noted that this now includes an additional paragraph to policy DS1 Development Strategy and Principles. Whilst we welcome this addition, we are concerned that councils infrastructure delivery study is not detailed enough to provide comfort that these will happen. For example with regards to Green Infrastructure appendix E, is limited in detail. These concerns have been raised in our pre- submission response and still stand. We believe without the level of detail required for certainty of delivery this plan remains unsound.

Regarding Modification 42 for policy WT2 . The Wildlife Trust is concerned with the additional wording "*footpaths and cycle routes will also be required particularly within the green spaces and to integrate with adjoining areas*" We are concerned that this will open up access routes to the River Itchen SAC . Recreational pressure on the Natura 2000 sites has been highlighted through the Habitat Regulations Assessment. The Trust would therefore wish to see this addition removed.

Regarding Modification number 43 for policy WT1 Development Strategy for Winchester Town. The Wildlife Trust disagrees with the change. We would wish to see the council acknowledge exactly how

much under-provision of open space it has. This provides the targets to enable monitoring to show whether this under provision has been dealt with over the plan period. In taken out the figures and just stating addressing **any** under provision it does not give the council anything to monitor the plan by. As recreational pressure is identified as a key significant impact on the Natura 2000 sites it is critical that the council not only makes up for the under provision by providing a net gain in informal open spaces. The Trust therefore wishes to see this policy stay as was with this change.

Regards Modification 62 for the policy SH14 (North of Fareham) The Wildlife Trust note the additional new text but feel that this does not address the concerns raised in our pre-submission response regarding the delivery of green infrastructure. We therefore maintain that this policy is unsound as it fails to provide for the green infrastructure requirements of the Fareham SDA which are needed to avoid recreational impacts to the Natura 2000 sites.

In summary

Overall the Wildlife Trust is disappointed that the modifications have not address most of our concerns raised in our pre-submission response. As such we still believe that the plan is unsound. Our reasoning for this is both given in this response and our pre-submission response.

If you wish to discuss any of these matters further then please do not hesitate to contact us.

Yours Sincerely



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