

## Policy SDN1 Nature Recovery (previously Policy SD9)

Number of comments on policy: 76

Number of additional responses to technical questions: 106

### Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
12	15	5	6	4	34

### Summary of issues and key themes raised

A mix of views were given on what percentage of biodiversity net gain should require. Some respondents recommend maintaining a statutory baseline of 10% biodiversity net gain and others were supportive of an increase to levels such as 20%. Respondents generally agreed that any increase needs to be supported by robust local evidence and viability testing. They stress that the policy should align with national and local frameworks - including the Environment Act 2021 - and be written in clear, concise language that defines key terms and delineates its scope. The feedback highlights a preference for on-site delivery of biodiversity gains over off-site measures. There were a mix of views given on the potential for policy requirements for integrated wildlife boxes and bricks, with concern raised about blanket requirements. Feedback was given then provision should be backed by evidence-based guidelines and accompanied by appropriate nearby habitats for a tailored approach to the type of integrated wildlife spaces provided. Additional comments call for wording amendments to address climate change, enhanced ecological connectivity through clearly defined landscape priorities, invasive species. Feedback also calls for robust monitoring and enforcement, and the adoption of locally adapted, innovative measures that safeguard both development viability and housing delivery.

#### Key themes raised:

- Biodiversity Net Gain (BNG) Targets
- Alignment with National Policy
- Integrated Wildlife Features
- Policy Clarity and Flexibility
- On-Site Versus Off-Site Gains
- Development Viability

### Overview of SDNPA response and way forward for the Local Plan

The Authority has considered and actioned policy wording amendments, and added new supporting text, as applicable and appropriate. In doing so, the Authority has sought to avoid duplication of national policy and provide suitable flexibility.

#### Biodiversity Net Gain (BNG) – Minimum Requirements

The Authority has considered the responses to the Regulation 18 consultation (including responses to SDN1 and additional technical questions), the findings of the South Downs Local Plan Viability Assessment, and the steer in national policy. In considering all the above, the policy has been amended to require a minimum of 33% BNG on strategic green field sites, and a minimum of 20% BNG on all other sites.

### Biodiversity Net Gain (BNG) - Offsite

Criterion 5 states that the use of off-site BNG should be delivered as close to the development site as possible, selecting locations within the National Park and preferably within the same landscape character type as reflected in the South Downs Landscape Character Assessment. It is considered that the word “should” allows flexibility in applying the requirements.

### Additional Technical Questions

#### Wildlife Boxes / Bricks

**Should the local plan have policy requirements for integrated wildlife boxes / bricks?** Of the 38 comments, 33 said “yes”, 2 said “no”, and 3 did not provide a reaction. In considering the above and additional comments made in relation to SDN1, the use of integrated wildlife spaces in buildings has been included in the supporting text. This is because provision of these must be tailored to and appropriate for the nature and location of the development and the species in the vicinity but is one way of achieving criterion 2.c. ‘Conserve and support recovery of protected, priority, rare and notable species and habitats’. The new supporting text explains that integrated wildlife spaces such as bat boxes, swift bricks, and bee bricks can make a valuable contribution in conserving and enhancing biodiversity for a variety of species, and that provision of integrated wildlife spaces for species appropriate to the area and well designed for the relevant species are encouraged. The guidance section includes a link to information on the SDNPA website which signposts to expert organisations on the appropriate provision of integrated wildlife spaces such as bird and bat boxes or bee bricks.

#### Biodiversity Net Gain (BNG)

The responses to the below 2 questions have been considered alongside the South Downs Local Plan Viability Assessment, comments about SDN1, and the steer in national policy – see the Authority’s response above.

**Do you agree that a higher percentage of Biodiversity Net Gain (BNG), beyond the statutory minimum of 10%, should be considered?** Of the 44 comments, 27 said “yes”, 14 said “no”, and 3 did not provide a reaction.

**Do you agree with the scenarios proposed to be tested?** Of the 24 comments:

- A range of views were expressed.
- Most comments were supportive of higher percentages, a minority considered the percentage should go beyond the scenarios proposed.
- On balance there was most broad support for a 20% BNG requirement.

**Policy SDN2 Designated Sites Hierarchy  
(New policy previously referred to as Policy NEW2)**

Number of comments on policy: 28  
Number of additional responses to technical questions: n/a

**Reaction to Regulation 18 Consultation**

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
3	7	5	5	3	5

**Summary of issues and key themes raised**

Respondents noted that the policy would benefit from clearer definitions and more prescriptive language, particularly for ambiguous terms such as “dark corridors”, “significant” and “zone of influence”, and raised concerns over vague details related to buffer zones and site sizes. They recommended robust safeguards for irreplaceable habitats - including ancient woodland and veteran trees - by setting high thresholds for development and incorporating additional habitat types like chalk streams. Respondents also called for close alignment with both national planning frameworks and local nature recovery strategies, with detailed criteria for alternative greenspace provision, biodiversity net gain and defined spatial planning and buffer zones. Other feedback focused on balancing flexible, evidence-based approaches with stricter measures, ensuring rigorous environmental impact assessments by qualified professionals, enhancing enforcement and monitoring beyond park boundaries, and providing further clarification on mapping and wider planning issues.

Key themes raised:

- Clarity, Definitions and Policy Organisation
- Robust Safeguarding of Irreplaceable Habitats
- Integration with National and Local Planning Frameworks
- Alternative Greenspace Provision and Biodiversity Net Gain
- Balancing Regulatory Flexibility with Prescriptive Measures
- Spatial Planning Controls and Buffer Zone Management
- Enforcement and Monitoring

**Overview of SDNPA response and way forward for the Local Plan**

It is considered that the policy reflects, and is consistent with, the 2024 National Planning Policy Framework, of which Paragraph 188 says plans should distinguish between the hierarchy of international, national and locally designated sites.

The Authority has considered variations of proposed changes and considers the revised policy wording and new supporting text to have addressed the principles of what is being sought by representors. To provide some specific, but not limited, examples:

- Criterion 1d amended using proposed wording from Sussex Wildlife Trust.
- Criterion 1e amended to correct formatting.
- The term “wildlife-rich habitat” is now defined in the glossary.
- The designated sites are mapped on the Policies Map.

As for points of clarification and reasons for why changes have not been made:

- Criterion 1d covers Local Nature Reserves (LNRs).
- Criterion 1e covers non-designated sites, and such sites are still subject to the protections and requirements set out in Policy SDN1.
- The requirement to follow the mitigation hierarchy is set out in Policy SDN1.
- Rare habitats and species are addressed in Policy SDN1.
- The use of buffer zones reflects best practice.
- Irreplaceable habitats are defined in the National Planning Policy Framework.
- A number of comments were about implementation rather than wording.
- The development plan should be read as a whole, for example:
  - Best and most versatile agricultural land is addressed in Policy SDC3; and
  - Potential impacts on the River Meon is addressed in Policy SDW1.
- BOAs are referred to in Criterion 2f of Policy SDN1 and are also in scope of Criterion 1e of this policy (SDN2) which refers to relevant biodiversity strategies, of which BOAs would be an example of these.
- It is not considered necessary to have a generic SANG and SAMM policy. The Habitats Regulations Assessment (HRA) for the local plan identifies Special Protection Areas (SPAs) that require a SANG/SAMM approach and arising from this is a specific policy for the Wealden Heaths Phase II SPA – see Policy SDN5.

## Policy SDN3 (previously Policy SD10)

Number of comments on policy: 23

Number of additional responses to technical questions: n/a

### Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
6	7	3	1	1	4

### Summary of issues and key themes raised

Respondents noted the importance of a clear, science-based spatial approach that defines 6.5km and 12km buffer zones extending from core sites and enhances key ecological features such as foraging habitats and commuting routes, with consistent regulation across boundaries. Proposals should be underpinned by robust ecological surveys and impact assessments that address both direct and indirect effects and include adequate mitigation measures. In addition, respondents recommend broadening habitat definitions and clarifying the protocol document's status to final and alignment across local planning authority areas.

#### Key themes raised:

- Spatial Scope and Landscape Connectivity
- Buffer Zones and Disturbance Mitigation Measures

### Overview of SDNPA response and way forward for the Local Plan

The overall agreement with the policy by respondents is noted.

In response to comments, the changes include:

- Amendment to criterion 1 to include both direct and indirect impacts
- Definition of suitable community and foraging habitat amended to include grassland.
- Criterion 1 wording clarified regarding surveys required.
- Criterion 1 amended to include enhancement of key features.
- Addition to supporting text to recognise requirements for protection of all bats and link to Natural England standing advice.

In response to other key matters raised:

- It was queried why this policy should be included in the plan. The policy sets out requirements for development to address legislation that protects Ebernoe Common SAC, The Mens SAC, and Singleton & Cocking Tunnels SAC as recommended by the Habitats Regulations Assessment that accompanies the South Downs Local Plan to ensure that development proposals will not have an adverse effect on the integrity of these habitats sites, in line with the requirements of the Conservation of Habitats and Species Directive 2017 as amended.
- The status of the Bat Protocol was queried. The protocol was published in 2018 in draft form. The bat protocol will be finalised.
- The River Meon as compensatory habitat for the River Itchen SAC is addressed by Strategic Policy SDN2 Designated Sites Hierarchy.

- Some comments raised that do not relate to the policy itself/its wording.

### Policy SDN4 (previously Policy NEW3)

Number of comments on policy: 14

Number of additional responses to technical questions: n/a

#### Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
2	3	6	0	0	3

#### Summary of issues and key themes raised

Respondents stress the importance of safeguarding the overwintering habitat of Bewick's swans by ensuring that any proposed alternative habitat is clearly demonstrated and in place before development commences. Several comments call for a strengthened evidence base and clearer policy wording, with compensation being considered only as a last resort in accordance with the mitigation hierarchy. There are also recommendations to reference the Arun Valley SPA Impact Risk Zone (IRZ). The importance of monitoring and enforcement was raised. A concern was raised regarding the importance of maintaining an appropriate hydrological regime and vulnerability of the site to potential water quality deterioration.

#### Key themes raised:

- Focus on Conservation of Bewick's Swans
- Strengthening Policy Wording and Evidence Base
- Compensation Mechanisms and Mitigation Hierarchy Compliance
- Alternative Habitat Provision and Suitability

#### Overview of SDNPA response and way forward for the Local Plan

The majority respondents agree or a neutral about the policy.

In response to comments, the changes include:

- Wording added to policy that makes clear compensation is a last resort.
- Wording is added to the supporting text to make clear that compensation should be delivered before development commences.

In response to other key matters raised:

- Further consideration is being given to the size of the buffer zone.
- Evidence that underpins the principle of the policy is considered robust. The commission of further evidence work by SDNPA to identify specific fields used by Bewick's swan is not considered proportionate to the scale of development that is expected through the South Downs Local Plan.

**Policy SDN5 (previously Policy NEW5)**

Number of comments on policy: 14

Number of additional responses to technical questions: n/a

**Reaction to Regulation 18 Consultation**

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
2	3	4	0	2	3

**Summary of issues and key themes raised**

Respondents generally supported the principle of the policy to protect the habitat and species of Wealden Heaths Phase II SPA. Respondents noted that the policy and buffer zones should clearly include key sites like Woolmer Forest SAC and Shortheath Common SAC. It was recommended that the policy makes clear the requirements for the 400m exclusion zone. They raised issues such as litter and overlapping use of public recreation land for Suitable Alternative Natural Green Space (SANG) provision and urged robust urban development controls that restrict new residential dwellings, especially within 400m of designated sites. Concerns about governance and enforcement were shared, and the need for mitigation measures to be applied in perpetuity, resulting in overall varied opinions on the policy.

**Key themes raised:**

- Buffer Zones and Spatial Delineation
- Environmental and Recreational Impact Management
- Development Controls

**Overview of SDNPA response and way forward for the Local Plan**

In response to comments, the changes include:

- Names of the component designated sites named in the policy.
- Policy wording is amended for clarity that the 400m zone is an exclusion zone.
- Requirements for mitigation in the 400m-5km zone are now added following further joint work between SDNPA, East Hampshire District Council and Waverley Borough Council, with input from Natural England, on the nature and scope of the requirements. Further work is being undertaken on a joint strategy and this is expected to be completed prior to submission of the new South Downs Local Plan for examination.

In response to other key matters raised:

- Concern raised regarding Suitable Alternative Natural Greenspace (SANG) on existing public recreation land and/or existing footpaths. SANG can be met on existing public recreation where it can be changed or improved in character or through facilities provision so that it is more attractive to the specific group of visitors who might otherwise visit the SPA.
- Other comments raised matters not related to the policy wording.

**Policy SDN6 (previously Policy NEW6)**

Number of comments on policy: 14

Number of additional responses to technical questions: n/a

**Reaction to Regulation 18 Consultation**

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
4	1	4	0	2	3

**Summary of issues and key themes raised**

Respondents emphasise that effective mitigation measures are essential for managing recreational pressure on the Solent Coast SPAs, with new residential developments within 5.6km required to avoid or mitigate their impact. They highlighted the value of collaborative work through the Bird Aware Solent partnership, and noting the alignment with other Local Plans in the area. Some responses recommended a clear definition and a specific threshold for significant adverse impacts to reduce ambiguity, while concerns were raised regarding financial mechanisms, enforcement and accountability. Consideration was recommended to include other types of development that may also need to address recreational impacts on a case by case basis. There were also observations on broader environmental challenges.

**Key themes raised:**

- Mitigation Requirements
- Strategic Consistency and Partnership

**Overview of SDNPA response and way forward for the Local Plan**

Overall support for or neutrality regarding the policy is noted.

In response to comments, the changes include:

- Wording is added to the policy which provides clarity on the scope of development, advising that some other types of development such as hotels, student accommodation and care homes may also need to address recreational disturbance and this will be assessed on a case by case basis.

In response to other key matters raised:

- The justification for the policy and Bird Aware Solent Strategy, and its governance and enforcement was queried. The evidence and history of these requirements is further explained in the supporting text for the policy and in the Habitats Regulations Assessment report which accompanies the plan. The mitigation strategy is well established across the Solent and has been operating for several years. The strategy is governed by the respective Local Planning Authorities and is subject to monitoring, annual reporting and regular review, the outputs of which are published online on the strategy website.
- Other comments were made that are outside the scope of the policy.

**Policy SDN7 (previously Policy NEW7)**

Number of comments on policy: 18

Number of additional responses to technical questions: n/a

**Reaction to Regulation 18 Consultation**

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
4	4	5	0	0	5

**Summary of issues and key themes raised**

Respondents stress the need to safeguard sensitive habitats – such as the Solent and the River Itchen, noted for its fragile chalk stream characteristics – by ensuring nutrient neutrality, applying catchment-wide measures and considering development buffer zones, while also observing that the policy may not fully anticipate future protected area designations. They call for mitigation and offsetting methods that deliver wider environment benefits, integrate with the local nature recovery strategy, favour stacking nutrient and biodiversity net gain benefits, and recommended improved legal agreements to secure local delivery. Comments also highlight that the policy’s focus on new overnight accommodation might exclude other development types that impact water quality, and advise clarifying ambiguous terms linked to hydrological connections and catchment boundaries. Wider comments are also made about addressing technical and monitoring challenges - such as those related to storm sewage overflow in the catchment and the current National England calculator.

**Key themes raised:**

- Protection of Sensitive and Designated Habitats
- Mitigation and Offsetting Approaches

**Overview of SDNPA response and way forward for the Local Plan**

Overall support for or neutrality regarding the policy is noted.

In response to comments, the changes include:

- Policy wording amended to reflect potential nutrient impacts on the River Itchen in addition to sewerage waste water.
- Policy wording amended to clarify that development is to demonstrate no adverse effect on the integrity of the relevant habitats sites.
- Policy wording amended for offsetting to take opportunities to deliver wider environmental benefits such as for biodiversity and to be clear that this should be delivered in the relevant catchment to where the development is taking place.
- Supporting text signposts Natural England guidance.
- Wording added to the support text that recognises that there may be some circumstances where a bespoke nutrient neutrality calculation may be required.

In response to other key matters raised:

- The need for the policy was queried. The reason for this policy is further explained in the supporting text and in the Habitats Regulations Assessment that accompanies the new Local Plan. The policy sets out requirements for development to address legislation the Solent and River Itchen designated habitats sites as recommended by the Habitats Regulations Assessment that accompanies the South Downs Local Plan to ensure that development proposals will not have an adverse effect on the integrity of these habitats sites, in line with the requirements of the Conservation of Habitats and Species Directive 2017 as amended.
- A nutrient budget for the new Local Plan is being prepared.
- Comments were also made that are not related to the policy.

## Policy SDN8 Trees, Woodland, Hedgerows and Scrub (previously Policy SD11)

Number of comments on policy: 49

Number of additional responses to technical questions: n/a

### Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
15	14	4	4	4	37

### Summary of issues and key themes raised

Respondents highlighted that the policy language must be clearer and more consistent with national guidance, calling for explicit definitions of terms such as “scrub” and clear guidance on replacing felled trees, with an emphasis on best practice standards like BS5837:2012. They noted that buffer zones require additional precision, suggesting wider buffers - especially for ancient woodland - and clear measurement criteria for features like hedgerows. Opinions on scrub management were divided, with some favouring site-specific assessments to inform whether conservation or removal was appropriate. There was support for combining natural regeneration with active tree protection, provided that all arboricultural work is carried out by qualified professionals and robust protection plans are in place. Respondents also stressed the need for strict oversight, enforceable compliance and developer accountability through clear regulation and penalties for non-compliance. In addition, they recommended measurable targets for urban greening and multifunctional ecosystem services, improved management of existing woodlands, innovative tree planting approaches that include a broader range of species, and various other refinements such as net gain provisions and clearer policy organisation.

#### Key themes raised:

- Policy Clarity, Consistency and Alignment with National Guidance
- Buffer Zones and Impact Protection Measures
- Scrub Conservation and Management
- Natural Regeneration and Active Tree Protection

### Overview of SDNPA response and way forward for the revised Local Plan

The SDNPA response and/or way forward has been grouped under headings below:

#### Buffers

The required 15m buffer between development and ancient woodland is a minimum, and larger buffers may be required depending on circumstances. The policy and supporting text emphasise that the buffer needs to be suitable to retain the natural growing processes and minimise indirect impacts throughout the life of the proposal. A 50m sensitivity zone is also identified. References to best practice guidance is provided in new supporting text and guidance list.

#### Deadwood

Supporting text includes clarification and further information about deadwood, while the policy wording has been amended to include “standing” deadwood and a caveat

about unacceptable levels of wildfire risk as identified by an authoritative agency such as the fire and rescue service.

#### Development Plan

The Development Plan comprises the South Downs Local Plan, made neighbourhood development plans (NDP), and adopted minerals and waste plans. In terms of comments about the relationship between the South Downs Local Plan and NDPs, NDPs contains non-strategic policies which must be in general conformity with the strategic policies of the South Downs Local Plan. As set out in NPPF Paragraph 31: *“Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently”*.

#### Scrub

In response to objections about the inclusion of “scrub”:

- Scrub is a valuable succession habitat, supporting a range of species; and
- The approach to scrub in the policy has been largely consolidated into criterion 3. This criterion explains that: *“where it is evidenced that removal of scrub would be desirable for nature conservation and landscape character reasons, this will be supported”*.

#### Other Changes and Clarifications

A number of issues raised (i.e., hedgerow regulations, enforcement and woodland management) are outside the scope of this strategic policy and the local plan and, in some instances, are already subject to existing advice, guidance, and controls. However, where suggested wording amendments are in scope, they have been considered in the policy wording and new supporting text as appropriate and applicable. In response to comments where no changes have been made:

- A fixed replacement ratio is not applied so to allow case-by-case assessment.
- Natural regeneration is an important approach but may not always be appropriate or feasible, so wording has been retained to allow a mix of approaches depending on a site and its context.
- Tree planting requirements already include flexibility for species selection and climate change considerations.
- In circumstances of prior ground clearance Biodiversity net gain (BNG) regulations include requirements to consider the status of biodiversity prior to in appropriate clearance.

**Policy SDN9 Sustainable Construction (previously Policy SD48)**

Number of comments on policy: 66

Number of additional responses to technical questions: 71

**Reaction to Regulation 18 Consultation**

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
9	15	3	5	3	31

**Summary of issues and key themes raised**

Respondents endorse the ambition for net zero operational carbon and enhanced energy efficiency while calling for practical, technology-aligned targets that reflect current industry capabilities and suggest referencing the UK Net Zero Carbon Buildings Standard for consistency. They advocate a balanced approach that applies targets to whole developments and incorporates clear, flexible criteria with phased or stepped requirements. Feedback supports incorporating embodied carbon assessments using consistent methodologies, with some respondents urging their application to all projects and others warning of burdens for smaller developments. In addition, respondents recommend explicit renewable energy targets, such as solar photovoltaic installations covering a defined area, and advise caution regarding battery storage systems in sensitive locations. They also propose specific water consumption limits, coupled with measures like rainwater harvesting and grey water recycling. Priority is given to retrofitting and reuse over demolition, accompanied by comprehensive pre-demolition audits and design for deconstruction principles. Thermal design measures are suggested to enhance climate resilience through natural ventilation, high insulation, and dynamic modelling.

**Key Themes raised:**

- Net Zero Operational Carbon and Energy Efficiency
- Integration with National Standards
- Policy Flexibility, Viability and Enforcement
- Embodied Carbon Assessment and Targets

**Overview of SDNPA response and way forward for the Local Plan**

Given the broad support received, the ambition for achieving net zero operational energy has been retained, with standards aligned to industry best practice and informed by the 2025 UK Net Zero Building Standard Pilot limits. This approach strengthens the case for going beyond current building regulations. Costing evidence has been commissioned to support the feasibility and viability of these expectations. In addition, clear guidance is now provided on in-lieu financial contributions, to be used only where achieving net zero on site is not technically feasible, as set out in criterion 1c)iii.

The Plan should be read as a whole, recognising that climate change adaptation is addressed across several complementary policies, including SDL2 on design

measures regarding overheating, green infrastructure and SUDs; SDW2 relating to flood risk; SDW3 on sustainable drainage; and SDG2 on wider green and blue infrastructure. To further support the transition to low-carbon energy, criteria relating to battery storage systems have also been added to Policy SDN10 on Renewable Energy.

## Policy SDN10 Renewable Energy (previously Policy SD51)

Number of comments on policy: 47

Number of additional responses to technical questions: n/a

### Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
10	10	5	4	3	15

### Summary of issues and key themes raised

Respondents noted issues with policy clarity, particularly the use of ambiguous terms such as “permanent”, “permitted”, “suitably sited” and “screened”, and recommended explicit definitions for acceptable projects including small-scale solar and wind installations up to 1MW and clearer parameters for community-led initiatives. They highlighted the need for detailed guidance on environmental assessments, safety risks, including careful site selection for battery storage systems, solar arrays and wind turbines—and technical issues such as noise, water quality and airspace considerations. Calls were made for individual project assessments that protect landscape character, visual amenity, agricultural land and heritage, alongside improved planning processes with early consultation with relevant statutory bodies. Respondents also advised diversifying and integrating renewable technologies to support local energy security and net zero targets while updating site assessments and clarifying key terminology.

#### Key Themes raised:

- Policy Clarity, Terminology and Ambition
- Community-Led Renewable Energy
- Landscape, Visual Amenity and Site Sensitivity Safety, Environmental and Technical Risk Management
- Planning Process Efficiency and Local Consultation
- Agricultural Land Protection and Site Suitability
- Strategic Contribution to Net Zero and Energy Security

### Overview of SDNPA response and way forward for the Local Plan

Consultation feedback showed a broad level of agreement with the direction of Policy SDN10, with many respondents expressing support for the encouragement of community-led energy proposals. In response to comments about viability and the pace of technological change, the previous 1MW capacity limit has been removed. Proposals will instead be assessed on their merits, with a requirement that they are appropriately scaled to meet local energy needs and demonstrate acceptable impacts.

The policy has also been amended requiring decision-makers to weigh the benefits of replacing fossil-fuel systems with small-scale renewable technologies within the overall planning balance.

Further refinements have been made to address issues raised during the consultation. A new criterion (1d) has been added to ensure that schemes create

new, or conserve and enhance existing, wildlife habitats. Another additional criterion (1h) responds directly to concerns from the Environment Agency and Portsmouth Water regarding the location and assessment of battery energy storage systems. Finally, the list of acceptable locations for ground-mounted solar development has been expanded to include land at Lancing College.