## Consultation comments on Policy W3 – St Peter's car park

- Support 5
- Neither support of object 11
- Object 8

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.

Respondent number	Comment	Officer comment
ANON- KSAR-NKJ6- A	But the density looks low especially given the opportunity to minimise use of land for parking and vehicular use. A masterplan be necessary, should this be included in the policy?	The site density can be refined with further detailed analyse of site as there are a number of constraints that would need to be taken into account such as Air Quality Management Area, flood risk and Winchester Conservation Area. <b>Recommended Response:</b> No change.
ANON- KSAR-NK6N- E	Though supporting we make the following remarks. In the supporting text 12.29 "which would enable the release of this car park for residential development", this justification is dishonest and absurd. St Peter's car park was built as a temporary car park whilst the Brooks Centre was being developed. It was promised for removal immediately that development was complete. For every Park and Ride development the Council has made since, it has promised to remove equivalent city centre parking. None of those promises have been kept. It is just one of the absurdities of the Movement	This paragraph in the Local Plan is only reflecting the position in the City of Winchester Movement Strategy and the fact that this site is now allocated for residential development shows a clear intention that the site will be redeveloped for residential development. <b>Recommended Response:</b> No change.

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Respondent number	Comment	Officer comment
ANON- KSAR- NKBD-G	I hope that, if this area is built on car parking will remain at River Park. Sometimes bringing in a car is the only practical option. I park here to go to the Farmer's Market or to use the park/Winnall Moors. To reduce car use we need frequent and reliable buses.	Car parking would be retained at River Park – see Policy W10. Whilst bus frequency and reliability is an extremely important issue this is not within the remin of the LP. <b>Recommended Response:</b> No change.
ANON- KSAR- N8GG-5	(2) St Peters Car Park - If replaced by Housing then Winchester City Council MUST SHOW HOW Customers can REACH Winchester shops and Market stalls and Christmas Market. No Customers = No shops = No Retail Rents income for Winchester City Council.	This is a very valued point and linked to the City of Winchester Movement Strategy which is encouraging more sustainable modes of transport and supporting new P&R facilities. <b>Recommended Response:</b> No change.
BHLF-KSAR- N8BQ-A Historic Environment	Para 12.32 - comment Minor typo/wording change. We support reference to the Winchester Conservation Area as worded in the policy Full doc in SP for mark ups - Any proposals will need to be designed	<b>Recommended Response:</b> Change: Any proposals will need to be designed in a sensitive manner as the southern part

Link here	in a sensitive manner as the southern part of the site is located with <b>in</b> Winchester Conservation Area.	of the site is located with <b>in</b> Winchester Conservation Area.
BHLF-KSAR- N8BG-Z BHLF-KSAR- N8BG-Z Link here Environment Agency	St Peters Car park During very wet years, groundwater levels under the site can be very high so any deep structures should ensure that groundwater is still able to flow downgradient towards the river. Any SuDSs need to ensure they account for these high groundwater levels.	Recommended Response: Add additional sentences at the start of paragraph 12.31: The site has high groundwater levels, which means that as part of the design process any structures will need allow the groundwater to flow downgradient towards the river. The SuDSs needs to be designed in a way to ensure that they have taken into account the high groundwater levels on the site. Add new criteria: The proposal addresses and takes into account the high groundwater levels as part of the design process to ensure that any structures allow the groundwater to flow downgradient towards the river. The SuDSs needs to be designed in a way to ensure that they have taken into account the high groundwater to flow downgradient towards the river. The SuDSs needs to be designed in a way to ensure that they have taken into account the high groundwater levels on the site.
BHLF-KSAR- N86Z-7	Main & Branch St Pauls	

St Clements Partnership

NHS Hampshire and Isle of Wight ICB - Primary Care Response

The GP surgeries that serve these potential sites are currently over subscribed by 10,900 patients of October 2022. The additional dwellings from the local plan will add a further 11,100 patients and in order to mitigate this the NHS will be seeking financial contributions to increase the primary care space by a further 888 m2 The ICB has invested significant revenue and capital funding from its limited budget into the Winchester City practices to enable them to grow their infrastructure to meet local need. St Clements Surgery is being supported by the ICB to build new premises through a third party developer, which the ICB will fund through the rental reimbursement of the lease upon completion. This will provide 1003m2 of General Medical Services space, an increase of 283m2, and 78m2 of new Winchester City Primary Care Network General Medical Services space, in order to grow local primary care services to meet current demand, and up to 2,300 of additional population. This is based on the currently adopted Local Plan. Further capacity will be required to meet a significantly expanding population should the SHELAA sites be agreed and potentially developed.

St Paul's Surgery have been supported in 2022/23 through an NHS Improvement Grant, to complete Phase 3/3 of their expansion plans, enabling the practice to create three new treatment rooms. Previous phases, some of which have been self funded, has enabled the Surgery to add three additional consultation rooms and a new waiting room. These capital investments have enabled the practice to grow with their increasing patient list, in line with the currently adopted Local Plan. Further capacity will be required to meet a significantly Officers have held a number of meetings with the ICB to understand further this representation and others on proposed site allocations in the regulation 18 draft Local Plan. Further information has been sought from the ICB to provide more detail on the nature and scope of any deficit in GP surgery facilities and how it may be resolved. This includes confirmation of which surgeries serve proposed allocations and which may require improvement. At this point it is considered prudent for the Plan and associated Infrastructure Delivery Plan to note this position and set out a mechanism to deal with any necessary infrastructure requirements arising from this request. The Infrastructure Delivery Plan will include the most recent information received from the ICB regarding the capacity of infrastructure and identified need for any improvements.

Recommended Response: No Change.

	expending penulation abound the CLIFLAA sites he agreed and	
	expanding population should the SHELAA sites be agreed and	
	potentially developed.	
	Friarsgate Surgery moved to purpose-built leased accommodation in	
	2009, which included additional space for the practice to grow into to	
	meet additional housing development, including the multiple phasings	
	of Barton Farm. Further capacity will be required to meet a	
	significantly expanding population should the SHELAA sites be	
	agreed and potentially developed.	
	The three Winchester surgeries and PCN have been clear with the	
	ICB that it does not feel able to absorb any further increases in	
	population due to agreed development without significant further	
	investment in primary care infrastructure. Due to the additional healthcare activities that will derive from the	
	Local Plan we believe that there should be references to healthcare	
	in the following policies W1,2,3,4,7,8 and 9 to inform potential	
	developers of the requirement for these impacts to be mitigated.	
	Policy W3 – 30 homes at St. Peter's Car Park	Support welcomed and comments noted.
	This site is in a highly sustainable edge of city centre location, well-	Support welcomed and comments noted.
	served by bus services. This location would make the site ideally	
	suited for no car / very low car parking provision. It is good that the	
	aspirations reference the need for permeability for cycling/walking	
BHLF-KSAR-	trips and wider connectivity and the County Council fully endorse this.	
N86T-1		
Hampshire	The car park is well used North-South as a route by pedestrians	Recommended Response: Add
County	accessing St Bede's C of E Primary school from residential areas to	additional paragraph after paragraph
Council	the south of North Walls. The Winchester LCWIP and Movement and	12.29
(Transport)	Place Plan work identified the aspiration to deliver a West to East	
	"quietway" active travel corridor from Station Hill, Swan Lane and	The Winchester LCWIP and Movement
	Marston Gate development in the west to the Winchester School of	and Place Plan work identified the
	Art (WSA) campus and Wales Street in the east. The WSA are	aspiration to deliver a West to East
	supportive of this, so the County Council would want to see the	"quietway" active travel corridor from

	development of this site support this west-east corridor (shown below). Picture on SP	Station Hill, Swan Lane and Marston Gate development in the west to the Winchester School of Art campus and Wales Street in the east. As part of the design process, any plans for the redevelopment of this site should assist with the delivery of this west- east corridor.
BHLF-KSAR- N86F-K Natural England	This site is in close proximity to Winnall Moors which forms part of the River Itchen SSSI. Policy W3 refers to air quality but does not reference potential impacts from surface water run-off. We recommend any forthcoming planning application includes an assessment of impacts from all potential sources of pollution including surface water run-off, and incorporates SuDS measures in line with policy NE6 and NE17. We recommend the policy also requires any application to be supported by a CEMP.	Recommended Response: Add new criteria under the heading Environment (see also response from the Environment Agency): The proposal includes an assessment of impacts from all potential sources of pollution including surface water run-off, and incorporates SuDS measures in line with policy NE6 and NE17.
BHLF-KSAR- N86M-T Hampshire County Council (Schools)	St Peter's Car Park The predicted numbers generated by this development are unlikely to have a significant impact on the local primary or secondary schools.	Support welcomed and comments noted.

Comments w	Comments which object to Policy W3 – St Peter's car park	
Respondent number	Comment	Officer comment
ANON- KSAR- NKYT-Q	This car park classified as being 'central' should, like all the other tarmac open car parks in the centre of Winchester, be restored (as it once was an orchard) to open green space for public use, thereby reducing run off after heavy rainfall and excessive heat radiation in summer with trees planted to absorb carbon and provide shade and hedges around it to cut noise and pollution, particularly from North Walls.	Whilst the comments are noted, the site is located within close proximity to North Walls recreation ground. Any redevelopment of this site will need to provide Biodiversity Net Gain (Policy NE5) and would need to be designed in a way that reduces surface water run off (Policy NE6 and new criteria to Policy W3) and deal with overheating (Policy D9). <b>Recommended Response:</b> No change.
	If the U of S development goes ahead on the Leisure centre site at River Park, rather than becoming 'green space' in the public realm once again, then St.Peter's Car Park being turned into open green space would compensate to a certain extent for the loss of the space at the old leisure centre.	See above response. Policy W10 (River Park) would not involve the loss of open space. <b>Recommended Response:</b> No change.
ANON- KSAR- NK2C-Y Southern Water	We have made an initial assessment of this site and ascertained that Southern Water's infrastructure crosses the site, which needs to be taken into account when designing the layout of any proposed development. An easement width of 6 metres or more, depending on pipe size and depth, would be required, which may affect site layout or	Recommended Response: Add new criteria under Other Infrastructure. The layout of the development must be planned to ensure future access to existing sewerage infrastructure for
Link here	require diversion. This easement should be clear of all proposed	maintenance and upsizing purposes.

	buildings and substantial tree planting.	
	Proposed amendment	
	Accordingly, we propose the following additional criterion for Policy W3:	
	Layout of the development must be planned to ensure future access to existing sewerage infrastructure for maintenance and upsizing purposes.	
	Please see the introductory comments to T1	
	Suggested revised text. We will send a tracked changes version which will highlight the changes we are suggesting:	
ANON- KSAR- N8GA-Y	<ul> <li>iv. The proposals are designed to create a permeable place for walking cycling and mobility scooters and be based around sustainable modes of travel that maximises the opportunity for walking, cycling and public transport which connect to the surrounding area/PROW/cycle network, landscape and designated heritage assets and links to the Winchester train station, the city centre and park and ride facility;</li> <li>v. Through the design process consider and assess the need for car parking on the site and ensure that there is safe pedestrian and cycle access to the site in accordance with Policy T3: with at least 0.053 mls each of cycling / mobility scooter infrastructure and walking infrastructure. In particular at this site it will be necessary to make provision for a cycling and pedestrian route from Park Avenue 25 m north of the junction with North Walls across the site to Gordon Road, and to maintain active travel permeability between Gordon Road and Upper Brook Street.</li> </ul>	Suggested changes to the policy are noted. However, it is important to read the Local Plan as whole as sustainable and active travel is dealt with in a separate topic. This is a very specific issue that can be dealt with as part of the design process. As part of the design process, an applicant will be required to prepare and submit a Design and Access Statement that will have needed to consider and take into account all users' needs irrespective of gender, age or disability. <b>Recommended Response:</b> No Change.

ANON- KSAR- NKX6-R	In redeveloping this area for housing you will be removing one of the largest car parking areas close to the city for shoppers and it will be harmful to businesses within the city. Local people wanting to access Winchester for an hour or two will not take an hour or more to cycle/car and bus/car and P&R to access the shops. You should retain the major car parks already within the city in order to support the businesses. Evidence base of older population and expectations too high.	This is a very valued point and linked to the City of Winchester Movement Strategy which is encouraging more sustainable modes of transport and supporting new P&R facilities. <b>Recommended Response:</b> No change.
ANON- KSAR- NKQN-9	Suggested Addition to (iv): "(iv) [ existing text] Specifically, any development must provide safe, direct walking and cycling routes between Gordon Road (and St Bede school), North Walls and Park Avenue, with enhanced shared crossings of North Walls to connect with Upper Brook Street and Parchment Street, and enabling a low traffic east-west route through Hyde running parallel to North Walls."	Please see response to representation from Hampshire County Council BHLF- KSAR-N86T-1. <b>Recommended</b> <b>Response:</b> No change.
ANON- KSAR- N8V5-2	The policy does not mention open space although that is in the vision and objectives of the local plan Need a policy for the car park site for retaining open space Need a policy to protect and retain the trees that already exist on the site. Think about how trees help with biodiversity, shade, air quality and flood risk Any development here is going to result in the loss of a wide open public space with access by the public so it contradicts the vision and objectives about public access to open spaces Also need a policy to protect vehicular access to the rear of existing properties along North Walls which back onto the site	Whilst the comments are noted, the site is located within close proximity to North Walls recreation ground. Any redevelopment of this site will need to provide Biodiversity Net Gain (Policy NE5) and would need to be designed in a way that reduces surface water run off (Policy NE6 and new criteria to Policy W3) and deal with overheating (Policy D9). <b>Recommended Response:</b> No change.
BHLF- KSAR-	Objections and comments The Trust supports this site allocation and its accompanying Policy	Any recommendations arising from the City of Movement Strategy would need to
N8BD-W	W3. If the outcome of the Movement Strategy is to make North Walls a	be taken into account as part of the

	two way road, this site needs to accommodate a bus layby for eastbound routes to complement the existing layby on the north side of Holy Trinity Church, for use by westbound routes. A masterplan would help to deliver a satisfactory development on this irregularly shaped site.	redevelopment of this site. It is not envisaged that the size of the site would require a 'masterplan' but any proposals would need to consider the any constrains on the site and nearby uses. <b>Recommended Response:</b> No change.
BHLF- KSAR- N8BE-X Environment Agency	<ul> <li>See SP for colours</li> <li>Comments</li> <li>Green text: No specific comments/generic comments apply - We welcome the recommendation to ensure development is located outside of FZ 2&amp;3</li> <li>Orange text: Action to be taken</li> <li>Red text: Concern over deliverability without further work/information</li> <li>3. St Peters Car Park (new site)</li> <li>30 dwellings</li> <li>Based on the information currently available, the site raises some environmental concerns that need to be addressed.</li> <li>Further work will be needed to show how these issues can be satisfactorily addressed to ensure no environmental impacts.</li> <li>FZ 2 &amp; 3, main river- River Itchen</li> <li>Principal Aquifer</li> <li>Flood Risk</li> <li>Notwithstanding our concerns regarding the sequential test, and for the policy to be sound we would advise that a level 2 SFRA is undertaken to provide a greater degree of certainty as to the level of flood risk, both now and with climate change.</li> </ul>	Further work has been undertaken with the support of the EA and HCC as the Lead Flood Authority on preparing a Stage 2 SFRA and site sequential and exception test – these reports are available on the LP website. Work has been undertaken with the support of EA to make changes to Policy W3 to address the EA representation. <b>Recommended</b> <b>Response:</b> Please see wording changes to the Policy.

The LPA have not demonstrated that this site allocation provides wider sustainability benefits to the community that outweigh flood risk. No specific development requirements appear to be available, however there is a risk of fluvial flooding from the river Itchen. The site currently falls into Flood Zone 2, but not Flood Zone 3. However, this flood extent is likely to increase further when climate change is considered over the lifetime of the development, although no mapping of this risk is currently available to inform the allocation of the site. The site is not in any SPZ but on principal aquifer, so would be regarded as sensitive.
Given the small size of the site, the Council should be aware of this risk and consider how this might affect the potential for the site to safely accommodate the scale and type of development proposed. We would like to see the requirement included for a site-specific Flood Risk Assessment which demonstrates that the development will be safe for its lifetime taking account of the vulnerability of its uses, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. This should include the measures identified in the Level 2 SFRA (2020) and a SuDS scheme to provide mitigation and opportunities to achieve a reduction in overall flood risk. We would also like to see a recommendation to avoid Flood Zones 2 & 3 with a policy of a suitable buffer zone. Flood plain storage compensation will also be required if development is proposed within the flood Zones which will be difficult to achieve on this site. The Council should be confident that the risk can be managed. Water Quality
The protection of the groundwater will need to be considered as part of this site - specific policy.

	Recommendations	Officer response
Comments from SA	No comments	
Comments from HRA	No comments	

## Add additional paragraph after paragraph 12.29

The Winchester LCWIP and Movement and Place Plan work identified the aspiration to deliver a West to East "quietway" active travel corridor from Station Hill, Swan Lane and Marston Gate development in the west to the Winchester School of Art campus and Wales Street in the east. As part of the design process, any plans for the redevelopment of this site should assist with the delivery of this west-east corridor.

Add additional two sentences at the start of paragraph 12.31:

The site has high groundwater levels, which means that as part of the design process any structures will need allow the groundwater to flow downgradient towards the river. The SuDSs needs to be designed in a way to ensure that they have taken into account the high groundwater levels on the site.

### Paragraph 12.32 – address typo.

Any proposals will need to be designed in a sensitive manner as the southern part of the site is located with**in** Winchester Conservation Area.

#### Amendments to W3

Land at St Peter's car park, as shown on the Policies Map, is allocated for about 30 dwellings. Planning permission will be granted provided that details accord with the Development Plan and meet the following specific requirements:

Nature of the development

- i. The proposals for the site has have involved and engaged with landowners, stakeholders and interested parties establishing principles for the disposition of uses across the site, access and junction arrangements and take into account the wider community uses of the existing site. Any applications for all or part of the site should demonstrate how the proposal will accord with these principles and achieve the form of development intended by this allocation as a whole;
- ii. The proposals include a high standard of architectural design and use quality materials and detailing and are of appropriate scale and massing that responds positively to the Winchester Conservation Area

## Add new criteria

- iii. As part of the design process, proposals should assess the overall height of the proposed development and the impact on the character of the Conservation Area and the Listed Buildings;
- iv. The proposals takes advantage of the site's close proximity to the Winchester Town Centre;

### Access and transport:

- v. The proposals are designed to create a permeable place and be based around enable sustainable modes of travel that
  maximises the opportunity for walking, cycling and public transport which reflecting the Winchester Movement Strategy
  and LCWIP. Active travel facilities should connect to the surrounding area/PROW/cycle network, landscape and designated
  heritage assets and links to the Winchester train station, the city centre and park and ride facilities;
- vi. Through the design process consider and assess the need for car parking on the site and ensure that there is safe pedestrian and cycle access to the site in accordance with Policy T3;

## Amend criteria as follows:

The site should only provide parking spaces for car clubs/shopping delivery unloading reflecting the accessible town centre location of the site and ensure that that high quality walking and cycling routes are provided in accordance with Policy T3;

### Environmental

- vii. Provides an attractive edge to the development that enhances the street frontage of North Walls;
- viii. The proposals take into account, as part of the design process, the Air Quality Management Area and provides the appropriate mitigation measures to address air quality issues;
- ix. Noise and contaminated land assessment and the appropriate remedial measures are put in place; and

## Add new criteria:

A site specific Flood Risk Assessment will need to be prepared and agreed that demonstrates how the development will be safe for its lifetime taking climate change and the vulnerability of the developments users into account, and ensure that flood risk is not increased elsewhere as a result of the development;

## Add new criteria:

The proposal addresses and takes into account the high groundwater levels as part of the design process to ensure that any structures allow the groundwater to flow downgradient towards the river. The SuDS needs to be designed in a way to ensure that they have taken into account the high groundwater levels on the site;

### Add new criteria:

The proposal includes an assessment of impacts from all potential sources of pollution including surface water run-off, and incorporates SuDS measures in line with policy NE6 and NE17;

## Add new criteria:

As part of the design process, opportunities should explore the de-culverting of the watercourse. Compensatory storage may be required;

## Add new criteria:

In order to ensure that harm to significant buried heritage assets is minimised an early-stage archaeological evaluation should be undertaken to understand the site's constraints and opportunities and to inform development proposals and mitigation strategies;

### Other Infrastructure

x. Create a permeable development and contribute to infrastructure needed to make the development acceptable in planning terms; **and** 

# Add new criteria

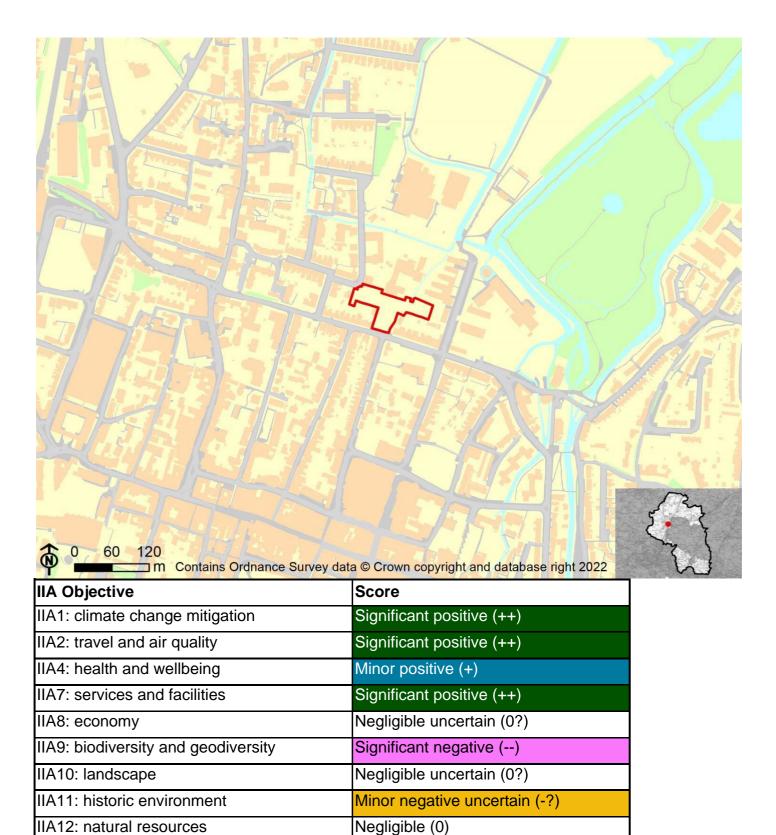
The layout of the development must be planned to ensure future access to existing sewerage infrastructure for maintenance and upsizing purposes.

# WIN22: St Peters Car Park, Gordon Road

## Proposed use: Residential use

IIA13: water resources

IIA14: flood risk



Negligible (0)

Minor negative (-)

IIA objective 1: To minimise the District's contribution to climate change through a reduction of greenhouse gas emissions from all sources and facilitate the aim of carbon neutrality by 2031

### **Overall effect: Significant positive (++)**

Score by criteria: 1a: Major positive (++); 1b: Major positive (++); 1c: Minor positive (+); 1d: Major positive (++); 1e: Minor positive (+); 1f: Minor positive (+); 1g: Major positive (++); 1h: Major positive (++); 1i: Major positive (++)

Justification: The site is within 400m of an NHS GP surgery. It is within 400m of a primary school. It is within 501-1,000m of a secondary school. It is within 400m of a town centre. It is within 201-400m of a district or local centre. It is within 501-1,000m of a railway station. It is within 300m of a bus stop. It is within 300m of open space, open country or registered common land. The site contains no open space, open county or registered common land. The majority of it is within an area where average commuting distance is in lowest 20% of average commuting distances for the plan area.

IIA objective 2: To reduce the need to travel by private vehicle in the District and improve air quality

### **Overall effect: Significant positive (++)**

Justification: Appraisal criteria and results are the same as shown under SA objective 1: greenhouse gas emissions.

IIA objective 4: To improve public health and wellbeing and reduce health inequalities in the District

## **Overall effect: Minor positive (+)**

Score by criteria: 4a: Minor negative (-); 4b: Negligible (0); 4c: Negligible (0); 4d: Major negative (--); 4e: Major positive (++); 4f: Major positive (++); 4g: Major positive (++)

Justification: The site is within 500m of an AQMA. The majority of it is within an area where noise levels at night from roads and railways are below 50 dB and the noise levels as recorded for the 16-hour period between 0700 – 2300 are below 55 dB. The site does not lie within a noise contour associated with Southampton Airport. It is within 400m of a wastewater treatment works or within 250m of a waste management facility. The site is within 400m of an NHS GP surgery. It is within 300m of open space, open country or registered common land.

The site contains no open space, open county or registered common land. It is within 200m of a public right of way or cycle path.

IIA objective 7: To ensure essential services and facilities and jobs in the District are accessible

#### **Overall effect: Significant positive (++)**

Justification: Appraisal criteria and results are the same as shown under SA objective 1: greenhouse gas emissions.

IIA objective 8: To support the sustainable growth of the District's economy

# **Overall effect: Negligible uncertain (0?)**

Justification: The site is not in existing employment use.

IIA objective 9: To support the District's biodiversity and geodiversity

# **Overall effect: Significant negative (--)**

Score by criteria: 9a: Minor negative (-); 9b: Negligible (0); 9c: Minor negative (-); 9d: Minor negative (-); 9e: Negligible (0) Justification: The site is within a SSSI Impact Risk Zone for 'residential' or 'all planning applications'. It is not within 500m of a locally designated wildlife site or ancient woodland. It is within 200m of a priority habitat. It is within 100m of a water course. The site does not intersect with a county or

local geological site.

IIA objective 10: To conserve and enhance the character and distinctiveness of the District's landscapes.

# **Overall effect: Negligible uncertain (0?)**

Justification: The site has low overall landscape sensitivity.

IIA objective 11: To conserve and enhance the District's historic environment including its setting.

## **Overall effect: Minor negative uncertain (-?)**

Justification: The site is rated 'amber' for risk of effects on heritage assets.

IIA objective 12: To support the efficient use of the District's resources, including land and minerals

# **Overall effect: Negligible (0)**

Score by criteria: 12a: Major positive (++); 12b: Negligible (0); 12c: Negligible (0)

Justification: The majority of the site contains brownfield land. Less than 25% of the site is on Grade 3 agricultural land. Less than 25% of the site is within a Mineral Safeguarding Area.

IIA objective 13: To protect the quality and quantity of the District's water resource

# **Overall effect: Negligible (0)**

Justification: The site does not fall within Source Protection Zone 1, 2 or 3, within a drinking water safeguard zone (groundwater), or within a drinking water safeguard zone (surface water).

IIA objective 14: To manage and reduce flood risk from all sources

# **Overall effect: Minor negative (-)**

Score by criteria: 14a: Minor negative (-); 14b: Negligible (0)

Justification: A significant proportion of site (>=25%) is within flood zone 2. Less than 25% of the site has a 1 in 100 year or 1 in 30 year risk of surface water flooding.