

## Integrated Impact Assessment

If you have any comments regarding the Integrated Impact Assessment please include as much detail below including page, paragraph and criteria number.

### Assessment of Site Ref WI19

Catesby disputes the conclusions of the Integrated Impact Assessment (IIA) regarding its evaluation of WI19 Land South of Titchfield Lane (commencing at page 1068 of IIA Appendix F). In reaching these conclusions, Catesby has regard to the technical assessments/surveys undertaken on its behalf and the masterplanning approach set out in the accompanying Vision Document that should be read alongside these representations.

Catesby proposes a revised assessment as follows:

IIA Score and Catesby Re-Assessment			
IIA Objective	WCC Score	Catesby Score	Notes
IIA1	Minor Negative (-1)	Negligible (0)	<p>A residential development on this site could bring forward measures to promote cycling and pedestrian access into the centre of Wickham. The proposals will also provide connections into existing PRow networks, with opportunities for off-site enhancements, to boost local sustainability.</p> <p>As a separate point, this IIA Objective also appears to ignore the current transition to electric vehicles. As the 'fleet composition' changes rapidly, commuting distances will become less strongly associated with carbon emissions.</p> <p>Overall, the score should be revised to 'Negligible (0)'.</p>
IIA 2	Minor Negative (-1)	Negligible (0)	As above.
IIA4	Minor Positive (+)	Minor Positive (+)	We agree with this score.
IIA7	Minor Negative (-1)	Negligible (0)	The IIA methodology does not appear to account for changing working habits and the well-documented propensity for people to work from home. This trend reduces the correlation between a site's distance from major urban centres and the level of associated carbon emissions.

IIA8	Negligible Uncertain (0?)	Negligible (0)	This site is not in employment use, nor is it proposed for such. The score should, therefore, simply be 'Negligible' rather than 'Negligible Uncertain'.
IIA9	Significant Negative (-)	Negligible (+)	Appropriate masterplanning will allow for a sensitive design that responds to biodiversity features. This includes buffers towards boundary hedgerows and trees assessed as being of elevated biodiversity value. The site's size also means ample opportunities to secure a net gain in biodiversity value of circa 10%. The overall score should, therefore, be amended to Minor Positive (+).
IIA10	Negligible Uncertain (0?)	Minor Positive (+)	<p>A landscape-led approach will be applied through the masterplan. This will respond to the topography of the site, and it should be noted that the land is very well-enclosed by adjoining tree belts, which will reduce the number of longer-distance viewpoints. Most near-distance views are also 'glimpsed', rather than 'unimpeded'.</p> <p>Additionally, Southern Water's 'Water Transfer and Water Recycling' proposals at the site (including a new pipeline and large pumping station / compound) will significantly change its baseline character. A well-considered residential scheme would facilitate a comprehensive landscape response to reduce the industrial / urbanising impacts of this new infrastructure.</p> <p>Overall, the score should therefore be revised to 'Minor Positive' rather than 'Negligible Uncertain', to reflect the certainty of a landscape-led scheme of uncertainty and to reflect the change in the site's baseline character, and the opportunity for betterment.</p>
IIA11	Negligible Uncertain (0?)	Negligible (0)	The masterplan will respond sensitively to identified heritage assets. Therefore, to reflect the lack of uncertainty, the score should be revised to 'Negligible' rather than 'Negligible Uncertain'.
IIA12	Significant Negative (-)	Minor Negative (-1)	The site comprises agricultural land of varied quality, albeit some of it is categorised within Grades 1 to 3.

			<p>Likewise, whilst the site falls partly within a 'mineral safeguarding area', there may be potential for incidental extraction associated with a future development.</p> <p>The score should, therefore, be amended to 'Minor Negative (-1)'.</p>
IIA13	Negligible (0)	Minor Positive (+)	The site is not located within a Source Protection Zone and therefore, development at this location would not impact water quality. Noting that much of the Plan-area is affected by this constraint, a 'Minor Positive (+)' score should be applied
IIA14	Negligible (0)	Minor Positive (+)	The site is not affected by flood risk constraints. Noting the Draft Local Plan's emphasis on mitigating the impacts of Climate Change, a 'Minor Positive (+)' score should be applied.

As indicated above, Catesby's assessment of WI19 Land South of Titchfield Lane, against the criteria set out in the IIA, provides a more realistic and positive appraisal of the site, taking into account accurate information regarding the site and information that has been made available to the Council through previous representations.

#### Policy On / Policy Off – Inconsistency of Evaluation

Following the above, Catesby is concerned with the inconsistency of the application of a 'policy-off' vs 'policy-on' approach in the IIA methodology. In this respect, sites proposed for allocation are evaluated based on potential mitigation measures (i.e., 'policy-on'), improving their scoring. This is explained in paragraphs 5.282 to 5.288 of the Main IIA Report. However, the potential for mitigation is discounted where omission sites are considered. This is apparent from the assessments undertaken in Appendix F of the IIA and the explanation commencing at paragraph 4.269 of the Main IIA Report. Indeed, this paragraph confirms that details provided by developers/site promoters (such as technical reports, emerging masterplans, and Vision Documents) were not considered when evaluating omission sites.

Therefore, Catesby is very concerned that in the absence of a like-for-like comparison, the proposed suite of allocations may not represent the most sustainable of the available options. Secondly, in not considering the potential for mitigation when evaluating omission sites, the IIA effectively reduces the number of sites (promoted and available for development) that could (with mitigation) reasonably be expected to address the IIA criteria and strategic objectives of the Local Plan. This disguises the potential of the Plan to deliver a higher housing requirement than is proposed.

#### Reasonable Alternatives

As indicated in our representation on Policy H1, where reasonable alternatives for 'Levels of Growth' are considered in the IIA Main Report (pages 588 to 595), the Council appears to have relied upon shortlisted

HELAA sites, the identified preferences of Parish Councils and the feedback provided from previous Regulation 18 consultations.

As such, the potential to provide for a significantly higher level of overall housing growth (for example, 3,000 to 5,000 additional dwellings above the current proposal) has not been properly tested in the IIA. This is a key shortcoming given the prevalence of unmet needs in the region and the pending uplift in the Standard Method.