

# Winchester District Proposed Submission Local Plan (Regulation 19) Consultation

## Integrated Assessment (Sustainability Appraisal) – Representations on behalf of Crest Nicholson Partnerships and Strategic Land

October 2024

### Introduction

1. These representations have been prepared on behalf of Crest Nicholson Partnerships and Strategic Land (herein, “Crest Nicholson”) in response to the Winchester City Council (herein, “the Council”) Proposed Submission Local Plan (herein, “the Plan”) Regulation 19 Consultation.
2. Crest Nicholson has an interest in all strategic and non-strategic matters informing the preparation of the Plan. However, these representations are made specifically in the context of Crest Nicholson’s interests in land falling within the North Whiteley Major Development Area (herein, “MDA”) (specifically, land parcels CU14, CU34 & CU45), which are identified under Policy SH2 of the Plan. Through these representations, Crest supports the allocation of the site for residential development.
3. These representations concentrate only on matters that are relevant to the allocating policy and matters that would associate with delivery of the site in due course pursuant to the terms of that policy.
4. These representations follow the structure of the Regulation 19 Consultation online survey, as relevant, with a particular focus on the Development Allocations (notably Policy SH2) and consider whether the policies are legally compliant, meet the tests of soundness and are compliant with the duty to co-operate. These representations also consider the evidence base which has informed the Regulation 19 Consultation including the Integrated Assessment documents which assess each of the proposed allocation sites.
5. Overall, these representations cover the following areas:
  - Strategic Policy SP1: Vision and Objectives
  - Strategic Policy SP2: Spatial Strategy and Development Principles
  - Strategic Policy CN1: Mitigating and Adapting to Climate Change
  - Policy CN3: Energy Efficiency Standards to Reduce Carbon Emissions
  - Strategic Policy D1: High Quality, Well Designed and Inclusive Places
  - Strategic Policy D3: Design Principles for the South Hampshire Urbans Areas
  - Strategic Policy T1: Sustainable and Active Transport and Travel
  - Policy NE5: Biodiversity

- Strategic Policy H5: Meeting Housing Needs
- Policy SH2: North Whiteley
- Integrated Impact Assessment (Sustainability Appraisal)

### Integrated Impact Assessment (IIA)

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

- Table 4.3 of the Integrated Impact Assessment (“IIA”) Report for Winchester outlines the scoring of each of the site options considered within the development strategy of the Regulation 19 Plan against the IIA Objectives.
- The IIA objectives 3 (adaptation to climate change), 5 (community cohesion) and 6 (housing) have not been included in the site appraisal work of the IIA. These factors were not taken into consideration as they do not depend on the location of the site and were taken into account by the SA through appraisal of development management policies and site-specific requirements set out in allocation policies.
- The summary of scoring for land parcels CU14, CU34 & CU45 (i.e. the Site) within the SA is as follows:

IIA Objective Reference	Effects Criteria	CU14 IIA Score	CU34 IIA Score	CU45 IIA Score
IIA1	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	+	+	+
IIA2	To reduce the need to travel by private vehicle in the District and improve air quality	+	+	+
IIA4	To improve public health and wellbeing and reduce health inequalities in the district	+	+	+
IIA7	To ensure essential services and facilities and jobs in the District are accessible	+	+	+
IIA8	To support the sustainable growth of the district’s economy	0?	0?	0?
IIA9	To support the District’s biodiversity and geodiversity	--	--	--
IIA10	To conserve and enhance the character and distinctiveness of the district’s landscapes	0?	0?	0?
IIA11	To conserve and enhance the district’s historic environment including its setting	0?	0?	0?
IIA12	To support the efficient use of the district’s resources, including land and minerals	--	--	--

IIA Objective Reference	Effects Criteria	CU14 IIA Score	CU34 IIA Score	CU45 IIA Score
IIA13	To protect the quality and quantity of the district’s water resources	0	0	0
IIA14	To manage and reduce flood risk from all sources	0	0	0

9. As identified by Table 2.1 of the IIA Report, the scoring criteria are as follows:

- ++ Significant Positive Effect Likely
- ++/- Mixed Significant Positive and Minor Negative Effect Likely
- + Minor Positive Effect Likely
- +/-Mixed Minor Positive and Minor Negative Effect Likely
- - Minor Negative Effect Likely
- --/+ Mixed Significant Negative and Minor Positive Effect Likely
- -- Significant Negative Effect Likely
- 0 Negligible Effect Likely
- ? Likely Effect Uncertain

10. Crest Nicholson has undertaken a review of the Site’s scoring within the IIA, following the scoring methodology outlined in Appendix E of the IIA. It is evident that the scoring for each parcel of the Site is identical as shown in above table. Therefore, in this review, the three parcels are considered collectively as a single Site. Below is a summary of the review conclusions for each IIA objective.

**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**

11. The IIA has identified a minor positive effect for all three land parcels CU14, CU34 & CU45 against IIA objective 1 which is appraised in relation to travel-related carbon emissions by consideration of access to essential services and facilities, public transport, open space, and employment.

Table E.1 of Appendix E indicates that IIA has used eight site assessment criteria for IIA objective 1 as shown in the table below. The below table also outlines Crest Nicholson’s scoring of the Site using the IIA’s methodology and scoring system:

Criteria	Sites specific assessment	Criteria Score	Proposed Score	Justification
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1a: GP surgeries	The site is within 801-1,200m of an NHS GP surgery.	-1	-1	Agreed
1b: Primary schools	It is within 400m of a primary school.	+3	+3	Agreed
1c: Secondary schools	It is not within 2,000m of a secondary school	-3	-1	A secondary school is approved at the centre of the North Whiteley MDA development, which is located within circa 1,200m.
1d: Town centres (Winchester, Whiteley)	It is within 401-800m of a town centre.	+1	+1	Agreed
1e: District and local centre District centres  (District Centres - Bishop's Waltham, New Alresford, Wickham)  (Local centres - Denmead, Kings Worthy, Oliver's Battery, Stockbridge Road, Weeke)	It is not within 800m of a district or local centre	-3	+3	North Whiteley Southern Local Centre (Outline planning approval granted for 700sqm of commercial floorspace, including retail uses, adjacent to Cornerstone Primary School) which is located within circa. 200m has not been included as a local centre under this site assessment criteria for IIA objective 1.
1f: Rail	It is within 1,000-2,000m of a railway station.	-1	-1	Agreed
1g: Bus Stops	It is within 300m of a bus stop	+3	+3	Agreed
1h: Open space	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.	+3	+3	Agreed
1i: Employment (2011 Census travel to work data)	The majority of it is within an area where average commuting	+1	+1	Agreed

	distance is in 21-40% range for the plan area.			
<b>Total Score</b>		<b>3</b>	<b>11</b>	
<b>Average Score</b>		<b>0.33</b>	<b>1.2</b>	
<b>Overall Effect</b>		<b>Minor Positive</b>	<b>Minor Positive</b>	

12. As identified by the Appendix E significance scoring, scores are totalled and then averaged (i.e. total score divided by number of criteria). Significance of the effect vs. the IIA objective is then scored as follows:

- Significant positive  $\geq +2$
- Minor positive  $>0$  to  $<2$
- Minor negative  $<0$  to  $<-2$
- Significant negative  $\geq -2$

13. Based on the assessment criteria for this SA objective, the **minor positive effect** scoring is justified. However, the Council’s scoring of the site against criteria 1c and 1e should be amended to a minor negative and major positive effect respectively.

**IIA Objective 2: To reduce the need to travel by private vehicle in the district and improve air quality**

14. Appraisal criteria and results are the same as shown under IIA objective 1.

**IIA Objective 4: To improve public health and wellbeing and reduce health inequalities in the district**

15. The IIA has identified a minor positive effect for all three land parcels CU14, CU34 & CU45 against IIA objective 4 which is tested by spatial analysis of their proximity to areas likely to have negative (e.g. high levels of noise pollution) or positive (e.g. access to open space) effects on health and well-being.

16. The IIA has used seven site assessment criteria for IIA objective 4 as shown in the table below. The table below also outlines Crest Nicholson’s scoring of the Site using the IIA’s methodology and scoring system:

Criteria	Sites specific assessment	Criteria Score	Proposed Score	Justification
4a: AQMAs	The site is not within 500m of an AQMA	0	0	Agreed

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4b: Noise pollution from roads and railways	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	0	0	Agreed
4c: Noise pollution from airports	The site does not lie within a noise contour associated with Southampton Airport.	0	0	Agreed
4d: Odour and dust from waste facilities	It is not within 400m of a wastewater treatment works or within 250m of a waste management facility.	0	0	Agreed
4e: GP surgeries	The site is within 801-1,200m of an NHS GP surgery	-1	-1	Agreed
4f: Open space	It is within 300m of open space, open country or registered common land.	+3	+3	Agreed
4g: Public Rights of Way (PRow) / Cycle Paths	It is within 200m of a public right of way or cycle path.	+3	+3	Agreed
<b>Total Score</b>		<b>5</b>	<b>5</b>	
<b>Average Score</b>		<b>0.83</b>	<b>0.83</b>	
<b>Overall Effect</b>		<b>Minor Positive</b>	<b>Minor Positive</b>	

17. Based on the assessment criteria for this IIA objective, the **minor positive** effect scoring is justified.

**IIA Objective 7: To ensure essential services and facilities and jobs in the district are accessible**

18. Similar to site assessment criteria for IIA objective 1.

**IIA Objective 8: To support the sustainable growth of the district’s economy**

- 19. The IIA has identified a negligible uncertain effect for all three land parcels CU14, CU34 & CU45 against IIA objective 8 which is assessed against the loss of existing employment land.
- 20. Crest Nicholson confirm the site is not in existing employment use therefore, Crest Nicholson suggest amending the negligible uncertain effect to **negligible effect**.

**IIA Objective 9: To support the district’s biodiversity and geodiversity**

- 21. The IIA has identified a significant negative effect for all three land parcels CU14, CU34 & CU45 against IIA objective 9 which is assessed based on the proximity of the Site to an internationally, nationally or locally designated conservation site having the potential to affect the biodiversity or geodiversity of those sites/features, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, or increased recreation pressure.
- 22. The IIA has used seven site assessment criteria for IIA objective 9. The below table outlines Crest Nicholson’s scoring of the Site using the IIA’s methodology and scoring system.

Criteria	Sites specific assessment	Criteria Score	Proposed Score	Justification
9a: internationally and nationally designated biodiversity assets	The site is within a SSSI Impact Risk Zone for ‘residential’ or ‘all planning applications’	-1	-1	Agreed
9b: Locally designated wildlife sites and ancient woodland	It is within a locally designated wildlife site or ancient woodland (Intersects with designated site)	-3	-3	Agreed – Although provision will be made for a 15m buffer adjacent to the Ancient Woodland which lies along the western boundary of the southern parcel.
9c: Local Biodiversity Action Plan (BAP) habitat	It is within a priority habitat (Intersects with Local BAP habitat)	-3	-3	Agreed
9d: Water course	It is not within 100m of a water course	0	0	Agreed
9e: Geological sites	The site does not intersect with a county or local geological site.	0	0	Agreed
<b>Overall Effect (If any of the criteria score major negative then the score is significant Negative)</b>		<b>Significant Negative</b>	<b>Significant Negative</b>	

**IIA Objective 10: To conserve and enhance the character and distinctiveness of the district’s landscapes**

- 23. The IIA has identified a negligible uncertain effect for all three land parcels CU14, CU34 & CU45 with respect to objective 10 based on landscape sensitivity assessment under Natural England guidance.
- 24. The landscape sensitivity assessment has identified that the Site has low overall landscape sensitivity therefore the recognition of **negligible effect** is justified.

**IIA Objective 11: To conserve and enhance the district’s historic environment including its setting**

- 25. The IIA has identified a negligible uncertain effect for all three land parcels CU14, CU34 & CU45 with respect to objective 11 which assessed the sites based on the impact of the development on the designated heritage assets.
- 26. The heritage assessment work commissioned by the Council has found out that the extensions to the site allocated in the adopted Local Plan (i.e. parcels CU14, CU18, CU24, CU34 and CU45) are acceptable/appropriate in principle from a heritage perspective as development would not result in identified harm to heritages assets therefore, it is recommended to amend the negligible uncertain effect to **negligible effect**.

**IIA Objective 12: To support the efficient use of the district’s resources, including land and minerals**

- 27. The IIA has identified a significant negative effect for all three land parcels CU14, CU34 & CU45 with respect to objective 12 assessed based on potential harm to soil quality through the development of greenfield land by reference to the Agricultural Land Classification (ALC).
- 28. The IIA has used three site assessment criteria for IIA objective 12. The below table outlines Crest Nicholson’s scoring of the Site in accordance with the IIA’s scoring methodology:

Criteria	Sites specific assessment	Criteria Score	Proposed Score	Justification
12a: Greenfield land	The majority (>50%) of the site contains greenfield land	-3	-3	Agreed
12b: Agricultural Land	significant proportion of the site (>=25%) is on Grade 1 or 2 agricultural land	-3	-2	According to Natural England mapping site is mainly Grade 3 with less than 25% on Grade 1 or 2 land. As such this should be minor negative.
12c: Minerals safeguarding	Less than 25% of the site is within a Mineral Safeguarding Area.	0	0	Agreed
<b>Overall Effect (If any of the criteria score major negative or two or more score minor negative, the overall significance of the effect of the site vs. the IIA objective is significant negative).</b>		<b>Significant Negative</b>	<b>Significant Negative</b>	



**IIA Objective 13: To protect the quality and quantity of the district’s water resources**

- 29. The IIA records a negligible effect for all three land parcels CU14, CU34 & CU45 against IIA objective 13.
- 30. It also identifies that all three sites do 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).
- 31. Therefore, the **negligible effect** identified by the IIA for this objective is justified.

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

- 32. The IIA identifies a negligible effect for all three land parcels CU14, CU34 & CU45 with respect to IIA objective 14 considering the Environment Agency Flood Risk Zones and Surface water flood risk areas of the Site.
- 33. The IIA has used three site assessment criteria for IIA objective 14. The below table outlines Crest Nicholson’s scoring of the Site using the IIA’s methodology and scoring system.

Criteria	Sites specific assessment	Criteria Score	Proposed Score	Justification
14a: Environment Agency Flood Risk Zones	Less than 25% of the site is within flood zone 2 or 3	0	0	Agreed
14b: Surface water flood risk areas	Less than 25% of the site has a 1 in 100 year or 1 in 30 year risk of surface water flooding	0	0	Agreed
<b>Overall Effect</b>		<b>Negligible</b>	<b>Negligible</b>	

- 34. Based on the assessment criteria for this IIA objective, the **negligible effect** scoring is justified.