

Details of Representations Received to the Proposed Submission Local Plan (Reg19) January 2025

Integrated Impact Assessment

This document has been prepared to provide details of the representations received to the Proposed Submission Plan and the Council's response. It draws upon information contained within the submitted documents SD07b [Regulation 22 Statement of Consultation Part 2 \(November 2024\)](#) and SD16 [Regulation 20 representations \(November 2024\)](#). It is not considered that this document contains information which is substantially different to that set out within those submitted documents, but it has been prepared to assist in navigating and considering the representations received and Council Response.

For each plan policy or associated document, it sets out some key information from the regulation 22 statement regarding the number of representations received, representation numbers, an overall summary of responses made, and a list of the main issues raised by the representations. It then contains all of the representations recorded against that Plan policy or document, along with links to supporting documents. Finally, it sets out the Council's response to the representations made for that Plan policy or document, and any changes the Council now recommends are made to the Plan policy or document, alongside any other relevant information.

Local Plan Reference or document	Integrated Impact Assessment
---	------------------------------

Total Number of Representations received	31
---	----

Summary of Representations
The majority of the representations that refer to the Integrated Impact Assessment (IIA) relate to the application of the IIA in the site selection process, with particular reference to the application of environmental and infrastructure evaluations, which it is claimed has led to the allocation of inappropriate sites.

Many representations highlight ‘error’s in the IIA and disagree with the findings and that of other evidence e.g. settlement hierarchy, development strategy and site selection paper, so are challenging the allocation of specific sites in specific settlements e.g. South Wonston, Waltham Chase.

Some representations are using the IIA to promote their sites for further consideration on the basis that these ‘score’ better than the allocated sites.

Some representations state that the IIA does not meet the legal or policy requirements for a sustainability appraisal and strategic environmental assessment so is fundamentally flawed, with a particular focus on its failure to test reasonable alternatives in the context of achieving sustainable development.

There is also criticism as to why higher growth options were not assessed. Whilst some do not disagree with the methodology of the IIA, there is reference to housing need, including those waiting on the Winchester Housing Register which concludes that Winchester has failed to plan for sufficient housing for its current and future communities. Therefore, the plan fails to satisfy the IIA objectives identified, in particular IIA objective 6 ‘Housing to a decent standard’, and there is concern as to whether the plan therefore achieves sustainable development.

- Representation Numbers** (Statutory consultees in bold and named)
- ANON-AQTS-3B9Z-1/5/Integrated Impact Assessment
 - ANON-AQTS-3B83-S/2/Integrated Impact Assessment
 - ANON-AQTS-327R-7/1/Integrated Impact Assessment
 - ANON-AQTS-3291-8/11/Integrated Impact Assessment
 - ANON-AQTS-3B5A-4/10/Integrated Impact Assessment
 - ANON-AQTS-32GC-8/15/Integrated Impact Assessment
 - ANON-AQTS-329R-9/6/Integrated Impact Assessment
 - ANON-AQTS-32NS-Y/13/Integrated Impact Assessment
 - ANON-AQTS-329U-C/5/Integrated Impact Assessment

ANON-AQTS-3BP6-M - Wonston Parish Council/2/Integrated Impact Assessment

ANON-AQTS-329Q-8/40/Integrated Impact Assessment

ANON-AQTS-32UU-8/11/Integrated Impact Assessment

ANON-AQTS-32G7-V/19/Integrated Impact Assessment

ANON-AQTS-32SJ-U/12/Integrated Impact Assessment

ANON-AQTS-32TT-6/4/Integrated Impact Assessment

ANON-AQTS-3BQA-Z/22/Integrated Impact Assessment

ANON-AQTS-32TA-K/4/Integrated Impact Assessment

ANON-AQTS-3BPV-M/4/Integrated Impact Assessment

ANON-AQTS-32TE-Q/4/Integrated Impact Assessment

ANON-AQTS-32DS-N/2/Integrated Impact Assessment

ANON-AQTS-32F2-P/9/Integrated Impact Assessment

ANON-AQTS-32F5-S/1/Integrated Impact Assessment

ANON-AQTS-32ZS-B/8/Integrated Impact Assessment

ANON-AQTS-32ZM-5/5/Integrated Impact Assessment

BHLF-AQTS-328Y-F/14/Integrated Impact Assessment

BHLF-AQTS-328D-T/4/Integrated Impact Assessment

BHLF-AQTS-3287-D/2/Integrated Impact Assessment

BHLF-AQTS-328W-D/7/Integrated Impact Assessment

BHLF-AQTS-328X-E/22/Integrated Impact Assessment

BHLF-AQTS-32QY-8/14/Integrated Impact Assessment

BHLF-AQTS-32QZ-9/7/Integrated Impact Assessment

Main issues raised in representations received in regulation 19 consultation

- Lack of consideration of alternative quantum of development to meet housing needs;
- All reasonable alternatives have not been assessed; and
- Criticism of scores allocated through the IIA methodology in terms of not allocating sites promoted for consideration/ disagreement of scores given to allocated sites in the IIA.

Policy/Evidence base document	Integrated Impact Assessment
Name of respondent (or client)	Jane joyce
Personal reference number	ANON-AQTS-3B9Z-1
Full reference number	ANON-AQTS-3B9Z-1/5/Integrated Impact Assessment
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	Evaluation of Intergrsted assessment The village is unable to sustain the population it already has, No full time GP practice Monday to Friday within the village. No places available in village nursery or primary school and no places available in dedicated secondary school due to Barton Farm development. No public transport available for commuting into Winchester for work at peak times am, midday pm for PT or FT working.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i>	No

such as images, tables, or tracked changes, if applicable.

Policy/Evidence base document	Integrated Impact Assessment
Name of respondent (or client)	Jill Lee
Personal reference number	ANON-AQTS-3B83-S
Full reference number	ANON-AQTS-3B83-S/2/Integrated Impact Assessment
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	The errors in this document alongside other evidence base documents has led to South Wonston being classed as an intermediate settlement and given a housing target. In spite of the mistakes being pointed out at Reg 18 stage the mistakes have not all been rectified and no overview or reassessment undertaken to ensure that South Wonston is still suitable to take a housing allocation. At one point the settlement hierarchy was updated and was in conflict with what was in the IIA. In spite of being updated in July 2024 it still contains references to South Wonston residents having access to a healthcare centre. High speed broadband is also included as a benefit even though it is not available in South Wonston. This document is a legal requirement and is flawed.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation.</i>	No

However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.

Policy/Evidence base document	Integrated Impact Assessment
Name of respondent (or client)	Victoria Cuming
Personal reference number	ANON-AQTS-327R-7
Full reference number	ANON-AQTS-327R-7/1/Integrated Impact Assessment
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	The city has discounted the Kings Barton residents.view and the enenmentat affect on aaa residents esseacial Especlly children
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	Integrated Impact Assessment
Name of respondent (or client)	Foreman Homes Limited
Personal reference number	ANON-AQTS-3291-8
Full reference number	ANON-AQTS-3291-8/11/Integrated Impact Assessment
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>This comment has been summarised – see supporting information for full response</p> <p>Foreman Homes state that their representation is specifically with reference to SHELAA site CU08 ‘Land at Botley Road. Foreman Homes critiques the methodology and outcomes used within the Integrated Impact Assessment.</p> <p>Comments are made by Foreman Homes that the IIA site assessment methodology is not clear whether it only considers district or local centres within Winchester District, rather than taking into account cross-boundary relationships. The assessment should not consider Winchester District in isolation, particularly in relation to the south Hampshire Urban Area and the PfSH area of search to the east of Botley, which is identified as a location for growth to meet wider strategic needs.</p> <p>Inconsistencies exist in the assessment of sites. For example, when looking at distances to a primary school (for IIA Objective 1b) for sites in Curdridge Parish, it appears that the Botley CofE Primary School (within Eastleigh Borough) has been taken into account. SHELAA sites CU06, CO10, CU08 which are near the District Boundary are said to be between 400m and 1200m from a primary school. The distance to Curdridge Primary School is greater than this and therefore it must be assumed the assessment uses Botley CofE Primary School. Objective 1a on the other hand has not considered facilities within Eastleigh Borough. This looks at distance to an NHS GP Surgery. The NHS Living Well Partnership - Botley Surgery is located almost directly opposite the primary school, equal distances from the sites mentioned previously, however the assessments conclude all sites are over 1,200m from a GP surgery. The same applies to 1e for Local Centres. These inaccuracies have not been explained. Foreman Homes consider that the IAA does not consider cross boundary relationships and links with PfSH.</p> <p>Based on the table 1, FH consider the scoring criteria against the IIA objectives is inaccurate. Foreman Homes consider that Table 3 shows that the site now scores favourably against all other sites and equally to</p>

	those that have been allocated as part of the extensions to North Whiteley, or which have received planning permission.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Letter (commenting on Policies and Evidence Base - includes tables) Supporting document 1 (Letter re: SHELAA site CU08) Supporting document 2 (Location Plan) Supporting document 3 (Concept Plan) Supporting document 4 (Illustrative masterplan) Supporting document 5 (Access and Transport Report) Supporting document 6 (Landscape and visual study) Supporting document 7 (Flood Risk Assessment & Conceptual Drainage Strategy) Supporting document 8 (Interim Ecology Assessment) Supporting document 9 (Biodiversity Net Gain Feasibility Report) Supporting document 10 (Statutory Biodiversity Metric) Supporting document 11 (Preliminary Noise and Vibration Summary) Supporting document 12 (Vision Statement - Land at Station Hill, Botley)

Policy/Evidence base document	Integrated Impact Assessment
Name of respondent (or client)	Nia Powys
Personal reference number	ANON-AQTS-3B5A-4
Full reference number	ANON-AQTS-3B5A-4/10/Integrated Impact Assessment
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>This comment has been summarised – see supporting information for full response</p> <p>The respondent specifically references SHELAA site CU01 and states that an Ecological Technical Note prepared by The Environmental Dimension Partnership Ltd (EDP), identified the key ecological constraints and opportunities through a desk-based study and Extended Phase 1 Survey of the site. The respondent states that the Technical Note concluded that there are no significant ‘in principle’ constraints to any future development of the site which cannot be avoided through implementation of sensitive design, enabling the retention of sensitive habitats and features. There is also potential for future development to deliver significant enhancements including biodiversity net gain in line with the policy and retention of sensitive habitats and features, including green open space along the northern boundary to buffer the most valuable habitats such as mature trees, areas of scrub, adjacent woodland and watercourse.</p> <p>In addition, should this site come forward for development, EDP concluded that opportunities for meaningful landscape scale mitigation could be achieved, in line with existing national and local policy. The respondent highlights that these points were outlined in the previous Regulation 18 representation, however there has been no change to the LUC assessment. Furthermore, the respondent states that there has been no additional evidence or justification provided within the July 2024 update to support the significant negative rating being maintained, or indeed to indicate this has been taken into account. The respondent considers that the scoring should be amended from significant negative (--) to negligible.</p> <p>For the category ‘natural resources’ the site is assessed as ‘significant negative’ with the following text: ‘The majority of the site contains greenfield land. A significant proportion of the site (greater than or equal to 25%) is on Grade 1 or Grade 2 agricultural land. A significant proportion of the site (greater than or equal to 25%) is within a Mineral Safeguarding Area.’ The respondent states that the principles in the landscape led masterplan to support SHELAA site CU01 has not been taken into consideration in the updated IIA.</p>

	<p>The respondent notes that in relation to the Mineral Safeguarding Area there has been a change from to greater than or equal to 25% (rather than less than 25%) and inclusion of the phrase 'significant proportion.' The respondent notes that the change has not been evidenced or justified, and in the context of the proposed landscape corridor for the site and the proposed landscape-led masterplan, it is also not considered to represent a significant proportion in determining the overall rating. The respondent considers that the scoring should therefore be amended from significant negative (--) to negligible (0).</p>
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	
<p>What is your suggested wording or text for the policy?</p>	
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>No</p>

Policy/Evidence base document	Integrated Impact Assessment
Name of respondent (or client)	Mandy Owen (Boyer) on behalf of Vistry Partnerships
Personal reference number	ANON-AQTS-32GC-8
Full reference number	ANON-AQTS-32GC-8/15/Integrated Impact Assessment
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>This comment has been summarised – see supporting information for full response</p> <p>The respondent represents SHELAA site HU03 (Land at Pitt Vale). The respondent is acting for the omission site and has highlighted how the site scores in relation to the IIA objectives. Vistry Partnerships states that a significant positive effect should be recorded against Objective 1 in assessing climate change mitigation, in terms of proximity to facilities and services and public transport. The respondent states that the amendments should be made to the IIA as follows in relation to the IIA objectives:</p> <ul style="list-style-type: none"> • significant positive should be recorded against IIA objectives 2, 4 and 7 • negligible effect against IIA objectives 9 and 10. • Minor positive against objective 11. <p>Vistry Partnerships notes their concern 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. The respondent states that 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. The respondent notes that developers/site promoters (such as technical reports, emerging masterplans, and Vision Documents) were not considered when evaluating omission sites. Respondent is concerned that the IIA 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. Concern that the IIA disguises the potential of the Plan to deliver a higher housing requirement than is proposed.</p> <p>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 SHELAA sites, the identified preferences of Parish Councils and the feedback provided</p>

	<p>from previous Regulation 18 consultations. Concern that 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.</p>
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	
<p>What is your suggested wording or text for the policy?</p>	
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes</p> <p>Letter (commenting on policies and evidence base - includes tables)</p> <p>Supporting document 1 (Affordable Housing Statement)</p> <p>Supporting document 2 (Vision Document 1 - Pitt Vale)</p> <p>Supporting document 3 (Vision Document 2)</p> <p>Supporting document 4 (Landscape and Visual Technical Note)</p> <p>Supporting document 5 (Biodiversity Net Gain Feasibility Report)</p>

Policy/Evidence base document	Integrated Impact Assessment
Name of respondent (or client)	Barwood Land
Personal reference number	ANON-AQTS-329R-9
Full reference number	ANON-AQTS-329R-9/6/Integrated Impact Assessment
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>This comment has been summarised – see supporting information for full response</p> <p>The respondent represents SHELAA site OT08 Land off Cranbourne Drive. Barwood Land are concerned in respect of inconsistencies noted from the SHELAA, particularly in considering heritage and landscape impact and the IIA. The respondent is unclear how the site was ranked against allocated site OT03. The respondent considers that the Council’s Development Strategy and Site Selection 2022 report (updated in 2024), which includes initial technical appraisals in Appendix 3 (technical assessments were only done on chosen options), highlights the site could have a high impact on visual sensitivity and a medium impact on both landscape character sensitivity and value. The respondent considers that this level of assessment would have been useful as part of the IAA in order to consider alternatives more robustly. The respondent notes inconsistencies in the IIA assessment such as the proximity of OT03 to a primary school.</p> <p>The respondent considers that the scoring for OT08 in the IIA is incorrect and should be amended as per the detail in their representation and supporting documents.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	

Do you want to participate in hearing sessions for this policy?	
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Letter (commenting on policies, policies map & evidence base - includes tables and pictures) Supporting document 1 (Vision document - Cranbourne Drive) Supporting document 2 (Preliminary Ecological Appraisal (PEA)) Supporting document 3 (Preliminary Flood Risk and Drainage Review) Supporting document 4 (Heritage Appraisal) Supporting document 5 (Map - Compliant Site Access) Supporting document 6 (Local Plan Site Promotion - Transport)

Policy/Evidence base document	Integrated Impact Assessment
Name of respondent (or client)	Catesby Estates
Personal reference number	ANON-AQTS-32NS-Y
Full reference number	ANON-AQTS-32NS-Y/13/Integrated Impact Assessment
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	The Council's chosen online portal restricts the format of information that can provided in response to this statutory Regulation 19 consultation. Accordingly, Catesby's comments on the IIA are provided under a separate cover.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Supporting document 1 (Location Plan - Land off Titchfield Lane, Wickham) Supporting document 2 (Vision Framework) Supporting document 3 (Concept Plan) Supporting document 4 (Integrated Impact Assessment comments)

Policy/Evidence base document	Integrated Impact Assessment
Name of respondent (or client)	St Philips Strategic Land
Personal reference number	ANON-AQTS-329U-C
Full reference number	ANON-AQTS-329U-C/5/Integrated Impact Assessment
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>This comment has been summarised – see supporting information for full response</p> <p>In response to the Council’s Call for Sites in 2021, Park Farm, Land at Kiln Lane, Otterbourne (“the Site”) was submitted to the Council and considered in the SHELAA under ref: OT04. The ranking of the Site is shown as being the same as the proposed site allocation for Otterbourne, OT03, in all but one sub-category of one criterion, in relation to open space on the site which could be lost to development; more than 25% of the site is considered to contain open space, open county or registered common land which could be lost to development.</p> <p>There is a historic Tree Preservation Order covering the Site dating from 1951 which identifies the majority of the Site as ‘Otterbourne House Park’, the association of the site with Otterbourne House to the north has long since ceased with the boundaries of the Site showing clear distinction between it and Otterbourne House. The Site is not publicly accessible, there would not be any loss of open space, open county or registered common land and the IIA should be amended accordingly.</p> <p>The suitability of development on the Site is presented in the Vision Document which includes the reasons why the site is suitable for development and how this relates to RAG system in the SHELAA. The site is a deliverable site for housing in the short term, it is in a sustainable location at Otterbourne, a settlement which can and should sustainably provide additional development to contribute towards meeting the needs of both Winchester District, as well as unmet needs from neighbouring authorities in the PfSH area. As such, it is considered that an additional site allocation should be made in Otterbourne.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	

What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes <u>Letter (commenting on policies and evidence base - includes vision document)</u>

Policy/Evidence base document	Integrated Impact Assessment
Name of respondent (or client)	Wonston Parish Council
Personal reference number	ANON-AQTS-3BP6-M
Full reference number	ANON-AQTS-3BP6-M - Wonston Parish Council/2/Integrated Impact Assessment
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>This comment has been summarised – see supporting information for full response</p> <p>The Integrated Impact Assessment in respect of site SU01 (land at Brightlands) is flawed, as result perhaps of the lack of public consultation prior to the late inclusion of the site in the Regulation 19.</p> <p>No allocation was made for Sutton Scotney at the Regulation 18 stage due to the severe sewerage issues in the village. No consultation was therefore undertaken with residents on the available sites and few residents felt the need to respond to the Regulation 18 consultation. The Parish Council were advised eight days before the publication and have sought since then to bring the allocation and the Regulation 19 consultation to the attention of residents.</p> <p>WCC 'Sutton Scotney Site Selection Report' seeks to justify and support the allocation of site SU01 (WO10) over an alternative site in the village (WO11 - Land South of Wonston Road). The report contains a number of mistakes/disputed points that are included in our response. There is no evidence that the developer sought pre-application advice from Hampshire Highways, no room for a pavement on the A30, nowhere to install a safe pedestrian crossing and hedgerows would have to be entirely removed to provide access visibility (all detailed in our Appendices). The inability for pedestrians to cross the A30 would leave them cut-off, socially isolated from the village and reliant upon car travel.</p> <p>The Parish Council organised a consultation event and survey. 95 responses to the survey have been received, representing 24% of households in Sutton Scotney and shows a clear preference among residents for site WO11 (Land South of Wonston Road, known locally as Dairy Meadow) over the allocated site SU01 (Land at Brightlands).</p> <p>The Parish Council consider the Integrated Impact Assessment and Sutton Scotney Site Selection Report and their findings to be unsound. The selection of site SU01 cannot be justified as an appropriate strategy</p>

	due to the lack of consultation and errors occurring from reliance upon a report produced by the developer of the site.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Supporting document 1 (copy of Wates Development Regulation 18 response) Supporting document 2 (Letter from Wates Development to Wonston Parish Council re:Land at Brightlands) Supporting document 3 (Letter to Parish Council from Hampshire Highways) Supporting document 4 (Email re: pre-application) Supporting document 5 (photographs of site with comments) Supporting document 6 (Flooding map) Supporting document 7 (Groundsure - flooding information) Supporting document 8 (Copy of Parish Council questionnaire) Supporting document 9 (Reponses to PC questionnaire)

Policy/Evidence base document	Integrated Impact Assessment
Name of respondent (or client)	Bloor Homes Limited (River Reach, Unit 7 Newbury Business Park, London Road, Newbury, Berkshire, RG14 2PS)
Personal reference number	ANON-AQTS-329Q-8
Full reference number	ANON-AQTS-329Q-8/40/Integrated Impact Assessment
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>It is important to note that the draft allocation for Land at Mill Lane, Wickham (Policy WK5) (Site WI02), demonstrates a better or similar sustainability score compared to a number of other proposed allocations including Sir John Moore Barracks (Policy W2), Central Winchester Regeneration (Policy W7), Station Approach Regeneration Area (Policy W8), Tollgate Sawmill (Policy BW3) and Clayfield Park (Policy CC1) as detailed within the Regulation 19 Integrated Impact Assessment Report, 2024 (refer to Appendix F, Site Assessment Proformas, pages 1024-1026). Furthermore, the site benefits from being under single ownership. In addition, the land at the junction of Mill Lane, Wickham (WI06), which was part of the initial masterplan, also scores higher or similarly in sustainability terms within the Integrated Impact Assessment Report (refer to Appendix F, pages 1033-1035) than the above site. This site, similarly under single ownership, is more likely to be deliverable than the aforementioned brownfield sites and can support up to 40% affordable housing. We therefore propose that the draft allocation for Land at Mill Lane, Wickham (Policy WK5) be expanded to incorporate WI06, increasing the total number of units on the site from 40 to around 100 and significantly elevate the number of affordable housing units from 16 to up to 40 on the site.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	

<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes Letter (commenting on policies, policies map and evidence base) Vision document (Land At Mill Lane, Wickham)</p>
---	---

Policy/Evidence base document	Integrated Impact Assessment
Name of respondent (or client)	Crest Nicholson Partnerships and Strategic Land
Personal reference number	ANON-AQTS-32UU-8
Full reference number	ANON-AQTS-32UU-8/11/Integrated Impact Assessment
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>This comment has been summarised – see supporting information for full response</p> <p>The respondent represents SHELAA sites CU14, CU34 and CU45 has undertaken a review of each sites scoring within the IIA. The respondent considers that IIA objectives 3 (adaptation to climate change), 5 (community cohesion) and 6 (housing) have not been included in in the site appraisal work of the IIA. The respondent considers that 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 respondent considers that the assessment of the sites should be amended in relation to the SA objectives as it is currently felt the scoring is not justified.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	
Have you submitted supporting information?	<p>Yes</p> <p>Supporting document 11 (Integrated Assessment (Sustainability Appraisal))</p> <p>Supporting document 1 (commenting on policies and evidence base)</p>

All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.

Policy/Evidence base document	Integrated Impact Assessment
Name of respondent (or client)	Bargate Homes
Personal reference number	ANON-AQTS-32G7-V
Full reference number	ANON-AQTS-32G7-V/19/Integrated Impact Assessment
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>This comment has been summarised – see supporting information for full response.</p> <p>The respondent represents site SP01. The respondent notes that the findings of the IIA are noted, it is highlighted that this should not preclude the site being taken forward as an allocation within the draft plan. The development of agricultural land will be necessary to deliver on the homes required in the district, however this needs to be assessed in a balanced manner, which is proportionate based on other criteria.</p> <p>Similarly, a site that is located within a Mineral Safeguarding Area, may not be a negative if the minerals are extracted prior to development (subject to viability). There has been no acknowledgement of this within the assessment of 'significant negative.'. A landscape appraisal or ZTV have not been given due consideration as part of this assessment. Since the 2020 assessment, the wording has been amended from the site is not located within a SSSI Impact Risk Zone, to it being located within a SSSI Impact Risk Zone. The site is located at a significant distance from both SSSIs (reflected in the fact that the site was previously outside the SSSI Impact Risk Zone. Matterley Bowl SSSI is located on the other side of the settlement of Winchester town.</p> <p>The updated 2024 assessment has not taken into account the evidence provided at Regulation 18 stage with regard to the site. The locally designated wildlife site within 500m is Weeke Down Covered Reservoir SINC approximately 400m to the south which is privately owned with no residential access and no other pathways of impact are present between the site and the SINC. Accordingly, the 'Significant negative' assessment is considered to represent a distorted view of the Biodiversity and Geodiversity potential of the site and should be updated to 'Negligible'.</p> <p>The IIA assessment for objective 10 has been categorised as Minor Negative but makes no acknowledgement of the evidence provided at Regulation 18 stage. The climate change mitigation objective (IIA1) categorises the site as 'Minor Negative' however, there is no acknowledgement of the proposed crossing at Stockbridge Road which will be provided as part of the development, as well as the provision of</p>

	<p>enhanced pedestrian linkages through and into the site to facilitate enhanced connections to Winchester town centre.</p> <p>As noted under IIA1 (Climate change mitigation), there has been no acknowledgment within this assessment of the proposed crossing at Stockbridge Road to be provided as part of the development of the site. In addition, there has been no acknowledgement of the potential for the provision of enhanced pedestrian linkages through and into the site, in order to improve connections to the town centre, and its associated services and facilities.</p> <p>The assessment of IIA2 to reduce the need to travel by private vehicle in the District and improve air quality has not been evidenced, and merely states 'appraisal criteria and results are the same as shown under SA objective 1: greenhouse gas emissions.' - there has been no acknowledgment of the potential for enhanced pedestrian connections through and into the site which is considered to have a significant bearing on this objective. Promotion of sustainable transport modes through bringing the site forward will improve the stated rating.</p>
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	
<p>What is your suggested wording or text for the policy?</p>	
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details,</i></p>	<p>No</p>

*such as images, tables, or
tracked changes, if applicable.*

Policy/Evidence base document	Integrated Impact Assessment
Name of respondent (or client)	Mar, Adam and Nick Welch
Personal reference number	ANON-AQTS-32SJ-U
Full reference number	ANON-AQTS-32SJ-U/12/Integrated Impact Assessment
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>This comment has been summarised – see supporting information for full response</p> <p>The land and parcels are similarly assessed within the IIAR, which combines the necessary Sustainability Appraisal and Strategic Environment Appraisal to support the Reg 19 Plan, but with a much greater level of detail as required by Regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004.</p> <p>Parcel LH08 (and LH015) are being proposed as open space as part of a wider promotion for mixed residential and open space. Therefore the scoring and related assessment of their suitability for residential development are largely immaterial. The comments therefore focus on Parcels LH09, LH10 and LH14, where residential development is proposed. With the exception of IIRA objective 9 (biodiversity and geo-diversity), and to a lesser extent IIRA objective 12 (efficient use of the District’s resources), all the ‘residential’ Parcels otherwise score negligible/uncertain impacts against other IIRA objective criteria. This includes IIRA 10 (conserve and enhance the character and distinctiveness of the landscape) where each parcel is considered to have low overall landscape sensitivity (our underlining). This compares with Parcels LH08 and LH15, which have a medium/higher level of landscape sensitivity.</p> <p>The rationale for scoring a significant negative against IIRA objective 09 is because the parcels are within an SSSI Impact Risk Zone for ‘residential’ and within 500m of a locally designated wildlife site or ancient woodland. The site is located within the SSSI Impact Zone for the River Itchen SSSI, as is all of the built up area of Winchester and adjacent countryside. It is unclear why the parcels have been also identified as within 500m of a locally designated wildlife site or ancient woodland. Crab Wood is the nearest location for both Ancient Woodland and a Local Nature Reserve but is over 3 km away to the south-west. The reference to significant negative impacts against IIRA objective 12 is simply because they are greenfield sites, though Parcel 14 scores a minor negative because it contains existing commercial storage barns, hardstanding and parking and therefore is in part brownfield land. By comparison, the proposed Reg 19 allocation on Land West Courteny Road (Policy W4), is also located on the edge of Winchester and within the Settlement Gap,</p>

	<p>listed as Parcel HW09 in the IIRA, scored significantly less well. When assessed on the same basis prior to mitigation, it does not score positively against any objective criteria, and importantly, scores minor negative against the critical IIRA objective 1 (Climate change and reducing emissions); IIRA objective 2 (reducing car travel and air quality); and IIRA7 (accessibility to services, facilities and jobs). Equally, the site scores a minor negative/uncertain against IIRA objective 10, based on the conclusion it has medium-high landscape sensitivities.</p> <p>It should be noted that it is also an entirely greenfield site. With mitigation, which primarily relates to providing a pedestrian crossing at Worthy Road and benefiting from a potential Park & Ride facility nearby, this does improve to negligible/uncertain effect on IIRA1, 2 and 7, but IIRA 10 remains as minor negative/uncertain. My client does not object to the principle of an allocation on the site/Policy W4. However, Parcels LH09, LH10 and LH14 at Harestock Road clearly outperform the draft allocation site in the IIRA assessment, one of the critical evidence based documents used to justify the site selection. It is against this background that the Council have enhanced the capacity of the Policy W4 allocation from 100 dwellings in the Regulation 18 Plan, to 150 dwellings in the Regulation 19 Plan. Taking into account the above and assuming a 4 hectare development area, this would equate to a net density of 37.5 dwellings per hectare. It is questionable whether this is appropriate on an edge of countryside location and a site that is acknowledged as having a medium-high landscape sensitivity.</p>
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	
<p>What is your suggested wording or text for the policy?</p>	
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation.</i></p>	<p>Yes Letter (commenting on policies and evidence base re: Land at Harestock Road)</p>

However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.

Policy/Evidence base document	Integrated Impact Assessment
Name of respondent (or client)	Taylor Wimpey Strategic Land
Personal reference number	ANON-AQTS-32TT-6
Full reference number	ANON-AQTS-32TT-6/4/Integrated Impact Assessment
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>This comment has been summarised – see supporting information for full response</p> <p>Springvale Road, Kings Worthy (site ref KW05) needs to be compared Kings Worthy (ref. KW02 and KW12 within IIA). The updated DSSS improves the scoring for KW05 against three of the objectives, namely 1 (climate change mitigation), 2 (travel and air quality) and 7 (services and facilities), which have all changed from ‘minor negative’ to ‘minor positive’. This means that KW05 scores higher than KW02 across four objectives – namely 1, 2, 4 (health and well-being) and 7. KW05 scores the same as KW02 across the remainder of the objectives. Therefore, overall, my client’s site performs better than draft allocation KW02.</p> <p>Similarly, KW05 scores higher than the other draft allocation (KW12) against objectives 1, 2 and 7, the same against objectives 4, 8 (economy), 9 (biodiversity and geodiversity), 11 (historic environment) and 14 (flood risk). The scoring for objective 10 (landscape) was negligible uncertain for KW12 where it ‘was not possible to come to a judgement’ so this cannot be compared to the scoring for KW05. KW05 scores less than KW12 against objectives 12 (natural resources) and 13 (water quality), although we dispute the scoring as set out below. However, overall, it is clear that my client’s site at KW05 scores more highly than the proposed allocation at KW12.</p> <p>Objective 4 (health and wellbeing) this element of the assessment fails to take into account that my client is able to offer land north of the field identified within the evidence base as public open space. In terms of Objective 10 (landscape) it is considered inappropriate to consider the effects of KW05 would be wholly negative in the context of the potential for the northern field to be converted to public open space. That land is currently private land however, the allocation of the site could bring the land into public use with the associated benefits of opening the landscaping to local residents. The land rises away to the west, meaning that views across a wider vista would also be possible from the land. It is considered more reasonable to score KW05 a +/- (mixed minor effects likely) in respect of objective 10. At present, formal playing pitches are provided at Eversley Park Recreation Ground on the eastern side of Kings Worthy, south of Lovedon Lane, and informal public open space is also located on the eastern side of the village south of Lovedon</p>

	<p>Lane, adjacent to the A33. The provision of informal public open space on the western side of the village through the allocation of site KW05 will deliver an important new community facility which is accessible on foot to existing and future residents.</p> <p>Against objective 12 (efficient use of land) KW05 was assessed as having a ‘significant negative effect’ whereas KW12 is scored as having a minor negative effect. The rationale behind this scoring is questionable given the presence of the buildings on the two other proposed allocations (raising a question over why they weren’t scored equivalently to each other) - KW05 is a greenfield site and could offer a viable option to provide a significant quantum housing, making the efficient use of land on a very sustainable site.</p> <p>The scoring against objective 13 (water resource), is also questionable given – KW02 and KW05 scored equivalent to each other with an alleged ‘significant negative effect’ whereas KW12 was scored as having only a ‘minor negative effect’. The assessment is based on drinking water quality. The rationale behind the differentiation between the sites in terms of water quality is unclear however, KW05 has full access to clean drinking water and in this regard it is no different to existing or other future residential development in Kings Worthy. Drawing this together, KW05 has scored more highly overall than both the proposed allocations. The majority of the site lies within Flood Zone 1 being at low risk from flooding. A Preliminary Ecology Assessment has been carried out which has not identified any International or National sites of Ecological importance on the site. The WCC Open Spaces Assessment (July 2022) indicates that there is a deficiency in Play space along with Park / Recreation Ground in Kings Worthy. There is also a notable imbalance between the east and west sides of Kings Worthy whereby all existing Play space and Parks / Recreation Grounds are located on the east side of the settlement at Eversley Park. Existing residents on the west side of Kings Worthy have a walk of over 1km, partly uphill to access their nearest public open space.</p> <p>The masterplan shows how the site at Springvale Road could address both the deficit and imbalance within the settlement through the provision of a new area of open space on the northernmost field at the Springvale Road site. The ecological value of this land could be enhanced through managed wildflower planting on part of the space.</p>
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	
<p>What is your suggested wording or text for the policy?</p>	
<p>Do you agree with how the policy will be monitored?</p>	

If no, please explain	
Do you want to participate in hearing sessions for this policy?	
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Supporting information (Illustrative concept masterplan) Supporting information (Copy of letter re: Land at Springvale Road, Kings Worthy)

Policy/Evidence base document	Integrated Impact Assessment
Name of respondent (or client)	Abigail Heath (Savills UK LTD) on behalf of Bloor Homes
Personal reference number	ANON-AQTS-3BQA-Z
Full reference number	ANON-AQTS-3BQA-Z/22/Integrated Impact Assessment
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>This comment has been summarised – see supporting information for full response</p> <p>Concern is expressed how the Local Plan vision can be achieved through the current proposed spatial distribution strategy. The Local Plan's development strategy identifies three 'spatial areas' within Winchester District (Strategic Policy SP2). Bloor (representing Manor Park) considers that the overall housing requirement should be increased in order for the plan to be deemed sound and that the distribution of this housing requirement should be revised to ensure consistency with the evidence base.</p> <p>The R19 LP's spatial strategy insufficiently prioritises Winchester Town as the most sustainable location for growth. The proposed distribution of development commits disproportionate growth to areas with limited active travel and public transport infrastructure. This will result in an over-reliance on private car use that will inevitably lead to increased congestion, emissions, and community severance, negatively impacting resident health and well-being. This approach contradicts the Plan's own IIA criteria and conflicts with both current and emerging national planning policy, raising significant questions about the Local Plan's soundness.</p> <p>The geography of part of the Market Towns and Rural Areas results in a broadly similar position as the SHUA and the transport baseline summary. Winchester Town Area will always remain the largest attractor of commuting trips in the District and this is recognised within the WTA transport baseline summary. Delivering significant growth in other areas will inevitably result in the need to commute to the city over longer distance to access those opportunities.</p> <p>However, on the Council's own evidence, such locations are poorly served by public transport and active travel connections, such that those longer distance journeys will inevitably need to be made by car – compounding existing congestion, delay, air quality and variance in public transport journey times within WTA. This is in contrast to growth occurring within the WTA which would have access to more than 50% of the District's jobs within compact urban area which reduces travel distances, ensuring that over 60% of existing trips are already undertaken by non-car modes. The spatial strategy fails to demonstrate adequate integration</p>

	<p>with existing public transport networks and lacks a clear framework for aligning future development with public transport provision.</p> <p>The spatial strategy will deliver some 63.7% of growth outside of the Winchester Town Area and therefore, as recognised in the Council's own evidence, in the least sustainable locations in the District. Bloor do not consider that all new development should be located within the Winchester Town area, as there are some sustainable locations within the SHUA and MTRA, however the focus and distribution of development should be greater in and around Winchester Town.</p> <p>WCC sets out that mitigating and adapting to climate change and reducing the carbon footprint of the district is an important part of the new Local Plan. WCC recognises that it is essential for it to prioritise development towards sustainable modes of travel which includes safe and accessible means of transport with an overall low impact on the environment, which includes walking, cycling, ultra-low and zero carbon emission vehicles, car sharing and public transport (paragraph 6.2).</p> <p>Bloor supports the location of development in the most sustainable locations with the greatest opportunities for active and low carbon travel and delivery of 20-minute neighbourhoods. The R19 LP's evidence relies on a modelling approach fixed on a 'predict and provide' approach to highway capacity modelling. This is outdated and inconsistent with the Authority's stated commitment to a 'vision-led' approach for future transport schemes. The supporting documentatation (Appendix 3) outlines the failings (Neglect of Beneficial Impacts and Missed Strategic Opportunities).</p> <p>No new infrastructure has been identified to accommodate the change in demand in the southern part of the town. Manor Parks is the optimal location to facilitate this required park and ride. Do not consider that the WCC R19 LP strategic policies T1 Sustainable and Active Transport and Travel, SP2 Spatial Strategy and Development Principles and H1 Housing Provision can be deemed sound. Bloor therefore object to these policies. As above, further justification for Bloor's objection to SP2 and H1 is provided at Section 4.</p>
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	<p>SAME COMMENTS AS H3 AND SP2 PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.</p> <p>As set out in Section 2, Bloor supports the overall vision set out at page 19</p>
<p>What is your suggested wording or text for the policy?</p>	<p>SAME COMMENTS AS H3 AND SP2 PLEASE REFER TO PROVIDED REPRESENTATIONS TITLED – 131024 MANOR PARKS REGULATION 19 WCC CONSULTATION REPRESENTATION [FINAL] AND EXTRACTED TEXT BELOW.</p> <p>As set out in Section 2, Bloor supports the overall vision set out at page 19</p>

Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Letter (commenting on Policies & Evidence Base) Supporting document 1 (South Winchester Vision Document) Supporting document 2 (Response to the delivery of housing) Supporting document 3 (Technical Note 1 - Sustainability & Transport) Supporting document 4 (Technical Note 2 - Transport Feasibility Report) Supporting document 5 (Statement of Common Ground between Bloor Homes & Stagecoach (South) Ltd)

Policy/Evidence base document	Integrated Impact Assessment
Name of respondent (or client)	Taylor Wimpey Strategic Land
Personal reference number	ANON-AQTS-32TA-K
Full reference number	ANON-AQTS-32TA-K/4/Integrated Impact Assessment
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>This comment has been summarised – see supporting information for full response</p> <p>The Development Strategy and Site Selection 2024 paper does not identify any new allocations at Swanmore. The adopted Local Plan allocation at ‘The Lakes’ (Policy SW1) is carried forward. This is on the basis that there are “... Constraints around this location and the overall level of housing need can be met at other locations”. It is considered that the spatial distribution of housing across the District is imbalanced and the level of provision should be increased.</p> <p>TWSL controls ‘Land at Swanmore Road’ in the SHELAA (ref. SWA10). The site scores equivalent to, or better than the other five sites considered in the Integrated Impact Assessment (IIA). It is however, considered that the site should score higher on a number of criteria. In the first instance, the site is just 224m from the recreation ground, 570m from Swanmore College, 352m from Swanmore Primary School, 340m from the local shop and 110m from a bus stop. By comparison, the other sites considered within the assessment are, on average, located further away from the key facilities within the village with SWA10 (Field Farm) scoring best on 3 out of 5 measures of sustainability as contained in the table below. It scores 2nd on one of the remaining two measures meaning that, on average, it scores highly from a sustainability point of view. It is entirely appropriate for SWA10 to score better on objective 1 (climate change) and 2 (reducing the need to travel).</p> <p>Distances have been provided to various facilities. SWA10 can be considered to score well in respect of objectives IIA1 (climate change), IIA2 (reducing the need to travel), IIA4 (health and welling being), and IIA7 (access to services). The site is well located closer to existing services and facilities than other sites considered, meaning it could support the sustainable growth of the economy (IIA8) and has limited ecological value and is visually well contained (IIA9 and IIA10). It has no heritage constraints (IIA11), would be an efficient use of available land close to existing services (IIA12) and will have no negative impact on water resources or flood risk (IIA13 and IIA14). SWA10 is extremely well positioned to provide the additional housing numbers required as an allocation within the emerging Plan.</p>

What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Letter (commenting on policies and evidence base)

Policy/Evidence base document	Integrated Impact Assessment
Name of respondent (or client)	Bargate Homes Limited
Personal reference number	ANON-AQTS-3BPV-M
Full reference number	ANON-AQTS-3BPV-M/4/Integrated Impact Assessment
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>This comment has been summarised – see supporting information for full response</p> <p>There are no new allocations at Waltham Chase, yet current, Morgan’s Yard is carried forward (WC1). It is considered that the spatial distribution of housing across the District is imbalanced. Other available sites should be considered to address this deficiency.</p> <p>Bargate Homes’ site at Land South of Lower Chase Road, Waltham Chase (SH11) scored equivalent to WC1 in its overall score against the 11 objectives within the DSSS/IIA and on that basis there is no reason that it should not be allocated to rebalance the housing need across the District. It’s scoring should be increased, such that it performs more favourably than WC1. The site assessment for SH11 within the IIA report (Appendix F, pg’s 803-805) scores SH11 as 'minor negative' against IIA objectives 1 (climate change), 2 (travel and air quality) and 7 (access to services/facilities/jobs) and that part of the justification is that the site is "not within 2,000m of a secondary school". The site lies to the east of Waltham Chase and is within 500m of Swanmore College - raised in our representations on the Regulation 18 Plan. However, the 2024 IIA still states that the site is not within 2,000m of a secondary school. This is factually incorrect and should amended. This element of the site assessment should also be revised to score ‘major positive’, in recognition of the site's close proximity to this important local facility.</p> <p>Furthermore, the IIA objectives 1d and 1e only assess distances to town, district and local centres but ignores proximity to the centre of Waltham Chase which, should be re-instated as a 'larger village' given the range of services and facilities it has to offer. Paragraph D.53 of the IIA Report Appendices recognises the important role Waltham Chase. The IIA site assessment scoring should be revised to take into account the distance of potential site allocations to larger village centres. In the case of SH11, this site is the closest site to Waltham Chase centre of those identified in the SHELAA, lying approximately 130m from the crossroads at the centre of the village where the convenience store/post office and hairdressers (which has replaced the bike shop) are located.</p>

	<p>Pedestrian and vehicular access can be provided through Bargate’s Hawthorn Grove development to the south, linking to the bus stops on Forest Road (which provide services to destinations including Bishops Waltham, Botley, Hedge End, Wickham, Winchester, Fareham, Eastleigh (including Barton Peveril College) and Havant (including Havant and South Downs College)) and services in the village. Taking all of the account all of the above, the scoring for SH11 against IIA objectives 1, 2 and 7 should be revised so that it scores at least ‘minor positive’ to reflect its location close to both the centre of Waltham Chase and Swanmore College. The IIA explains that, in scoring sites against IIA objective 8 (supporting the sustainable growth of the district’s economy) effects for all residential sites are uncertain, given that they are based on information provided by site promoters on the call for sites forms. SH11 should be scored at least ‘negligible’ rather than ‘negligible uncertain’.</p> <p>Question the approach taken to assessing sites against IIA10 (landscape), which lacks transparency. It is assessed as ‘minor negative uncertain’. SH14 (Raglington Farm, Botley Road, Shedfield) is a 153ha site, remote from any defined settlements on exposed rising land. However, it is assessed as performing better than SH11 in landscape terms, scoring ‘negligible uncertain’. The scoring for SH11 should be revised to be ‘negligible uncertain’ or better.</p> <p>On the basis of the assessment above, and as summarised in Table 1 below, SH11 can be considered to score well in respect of objectives IIA1 (climate change), IIA2 (reducing the need to travel), IIA4 (health and wellbeing), and IIA7 (access to services). The site is well located closer to the centre of the village than any other site in the SHELAA and within walking distance of both Swanmore College and St John the Baptist Primary School, meaning it could support the sustainable growth of the economy (IIA8), and has limited ecological value and is visually well contained (IIA9 and IIA10). It has no heritage constraints (IIA11), would be an efficient use of available land close to existing services (IIA12) and has no negative impact on water resources or flood risk (IIA13 and IIA14). Comparison have been given for Site Assessment Scoring for SH11. SH11 is extremely well positioned to provide the additional housing needed within Waltham Chase. When Pegasus Group presented our Vision Document for SH11 to Shedfield Parish Council in 2022, they commented that, should there be a need for allocations in Waltham Chase, they would not object to SH11 being selected.</p>
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	
<p>What is your suggested wording or text for the policy?</p>	

Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Letter (comment on Policies and Evidence Base - includes tables) Supporting document 1 (Transport advice - Land north of Meon Green, Forest Road, Waltham Chase) Supporting document 2 (Vision Document - Land South of Lower Chase Road, Waltham Chase)

Policy/Evidence base document	Integrated Impact Assessment
Name of respondent (or client)	O'Flynn Group
Personal reference number	ANON-AQTS-32TE-Q
Full reference number	ANON-AQTS-32TE-Q/4/Integrated Impact Assessment
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>This comment has been summarised – see supporting information for full response</p> <p>The O'Flynn Group considers that the Integrated Impact Assessment Report (2024) ("the IIA") does not meet the legal or policy requirements for a sustainability appraisal and strategic environmental assessment, with a particular focus on its failure to test reasonable alternatives in the context of achieving sustainable development. As part of our response to Policy H3 we have considered the IIA and its effectiveness in assessing development options to deliver an increased level of housing in Winchester to help address the unmet need across the wider PfSH area.</p> <p>It is the responsibility of the Council to plan positively to help meet this unmet need of neighbouring authorities as much as possible. PPG (ID: 11-018-20140306) is clear that sustainability appraisal should: "consider and compare all reasonable alternatives". The IIA has not considered any development options which would provide a significantly increased level of housing to help address the full extent of the unmet need across the PfSH area. The IIA produced in 2022 to accompany the Reg 18 consultation only assessed meeting either 14,000 homes in three scenarios (below the district's local housing need) or 15,620 homes in Option 3 which is shown within Table 4.1 of the document. The IIA accompanying the Reg 19 Local Plan is no different and does not consider how a higher quantum of development arising from the unmet need in the PfSH area might reasonably be accommodated within the District.</p> <p>It is unclear why no higher growth options have been assessed, and why since 2022 the Council has not been working positively on its Local Plan work to consider higher growth options that would help to meet a greater amount of unmet need arising from the PfSH. If for no other reason, had the Council correctly explored that option and hypothetically found it could not meet higher levels of unmet need, it would have been in a stronger position to engage with its neighbours on the subject.</p> <p>Concerns about how the IIA has assessed sites against the stated objectives, which has resulted in potential large strategic allocations such as MI04 (Land at Micheldever Station) being assessed critically against</p>

	<p>Objective 2 (To reduce the need to travel by private vehicle in the District and improve air quality'). Appendix D presents the baseline sustainability information for the District. However, this is related to the 'as-is' situation across the District and provides little context for estimating the future nature of how individual development proposals might affect carbon emissions. Para D.9 states that the highest level of emissions continued to be from transport sources, however there is no breakdown of this information between private and public transport sources, with 'transport' being considered as one source of emissions within Table D.2.</p> <p>The IIA appraisals has resulted in large allocations such as Site MI04, which would inevitably focus on the utilisation of an active travel approach incorporating public transport use, achieving a negative score in respect of sustainability. This would indicate a flaw in the methodology of the IIA, in that any scheme which would be accompanied by a large increase in the use of transport is considered negatively, whereas smaller dispersed schemes that in aggregate would generate the same (or probably more) emissions score more positively. This appears to be an embedded logical fallacy within the IIA, which fails to consider what modal share of transport could occur and the consequent impact on climate change objectives.</p> <p>It is considered that the IIA is flawed first two reasons. Firstly, the assessment of strategic sites has been incorrectly assessed, notably in respect of their sustainably credentials in respect of transport. Secondly, it cannot be claimed that the Council has planned positively to deliver the greatest amount of housing possible to meet the wider unmet need, as the options for doing so have not been considered by the IIA.</p>
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	
<p>What is your suggested wording or text for the policy?</p>	
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been</i></p>	<p>Yes Letter (commenting on Policies, Duty to Co-operate & Evidence Base)</p>

*included in the representation.
However, the links provided
may contain additional details,
such as images, tables, or
tracked changes, if applicable.*

Policy/Evidence base document	Integrated Impact Assessment
Name of respondent (or client)	Stephen Berrow
Personal reference number	ANON-AQTS-32DS-N
Full reference number	ANON-AQTS-32DS-N/2/Integrated Impact Assessment
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>This comment has been summarised – see supporting information for full response</p> <p>Site Ref. BW17. Assessment p521 Table 5.45 is significantly misrepresentative in a number of areas. The coding of the IIA's for this site should be re-assessed. Given the significant misrepresentations of the IIA assessments, the selection of site BW17 as suitable for inclusion in the Local Plan when compared with other equally or more suitable sites, as expressed in the Development Strategy and Sites Proposed assessment 2024 (6.19), should also be reassessed accordingly.</p> <p>It is wholly misrepresentative to suggest under IIA1 and IIA2 that building 100 new dwellings will have a net minor positive effect in reducing emissions (as suggested under para 5.398) and improving air quality. Assuming even only 1 net new non-electric car per dwelling (conservative assumption), this would represent a significant increase in the number of cars in the town with resultant increased emissions . It will need to be reassessed (at least minor negative impact if not significantly negative).</p> <p>Misrepresentative to suggest under IIA1 and IIA2 that the site would "enhance or promote walking or cycling" any more than other sites within the same proximity to the major facilities of the Town eg sites BW9, BW15, BW11, BW24. BW17 is closer proximity to eg the primary school, it is further away from other local amenities such as some local shops (Sainsburys), key services (eg the Veterinary centre on Victoria Road), the doctor's surgery etc. Misrepresentative to suggest additional dwellings at BW17 would reduce the volume of traffic and promote walking or cycling any more than other sites in the area. The designation under IIA1 and IIA2 should be changed to "Minor Negative Effect Likely", in line with other comparable sites.</p> <p>The site has wide bio-diversity, including a large range of different species and acting as a natural corridor (akin to extensive hedgerow) enabling safe passage of wildlife through to Dundry Meadows ancient woodland, Local Nature Reserve and Local Wildlife Site (as referenced per 5.400). Misrepresentative to suggest that the destruction of this habitat and building of dwellings on the site and other required actions eg</p>

	<p>tarmacking of roads within the site, would result in anything other than a significant negative effect on the district's bio-diversity (assessed under IIA9).</p> <p>"Policy BW4 requires that the landscape-led masterplan for the site ensures space is provided for biodiversity net gain within the northern portion of the site" – the achievability of this should be objectively assessed based on a detailed survey of the current site bio-diversity. If it cannot be demonstrated that a net gain is achievable, the site should be removed from the Local Plan or assessed against other potentially more suitable sites eg BW36 or BW12.</p> <p>In terms of the impact on landscape (IIA10), states "The effect is uncertain given that the design of any proposal that might come forward for the site is presently unknown.". As such, it is misrepresentative in Table 5.45 to show "Site considering mitigation in Policy BW4" as a "Negligible effect likely" and it should instead remain at least in line with "Site BW17" as "Minor negative effect likely".</p>
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	
<p>What is your suggested wording or text for the policy?</p>	
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>No</p>

Policy/Evidence base document	Integrated Impact Assessment
Name of respondent (or client)	Three Maid LLP
Personal reference number	ANON-AQTS-32F2-P
Full reference number	ANON-AQTS-32F2-P/9/Integrated Impact Assessment
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	Comments are provided within the submitted letter - No new employment allocations are proposed and the Integrated Impact Assessment shows that the Council has not considered any alternatives than their approach of carrying forward existing undelivered allocations. This does not meet the requirements of the SEA/SA Regulations Schedule 2(8) which requires an "assessment of reasonable alternatives" and the identification of the "reasons for selecting the alternatives tested in the light of the others available." In <i>Ashdown Forest Economic Development LLP v SSCLG and Wealden DC</i> [2014] EWHC 406 (Admin), Mr Justice Sales held (at paragraph 97) that the plan maker should be aware "The court will be alert to scrutinise its choices regarding reasonable alternatives to ensure that it is not seeking to avoid that obligation by saying that there are no reasonable alternatives or by improperly limiting the range of such alternatives which is identified." At present this is considered a legal failure with the plan.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	
Have you submitted supporting information? <i>All relevant information related to the specific policy or</i>	Yes Letter (commenting on Policies and Evidence Base)

allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.

Policy/Evidence base document	Integrated Impact Assessment
Name of respondent (or client)	patricia mary pearson
Personal reference number	ANON-AQTS-32F5-S
Full reference number	ANON-AQTS-32F5-S/1/Integrated Impact Assessment
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	My objection refers to Winchester City Council's Proposed Submission Local Plan 'Regulation 19' and is entry 5.55 "Move the bus station to the rail station area and develop the site with city centre uses". I have set out my objections in my e-mail to the planning department, dated 11/10/24.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	No

Policy/Evidence base document	Integrated Impact Assessment
Name of respondent (or client)	Andrew Craig
Personal reference number	ANON-AQTS-32ZS-B
Full reference number	ANON-AQTS-32ZS-B/8/Integrated Impact Assessment
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>Appendix D, Paragraph point D79 Correction. The new Winchester Sport and Leisure Park does NOT have any indoor tennis courts, and did NOT provide any additional artificial turf pitches, which therefore did not contribute to addressing the identified shortfall of these specific facilities. (In fact the new leisure centre (whilst excellent) was built on the Garrison sports ground, which did actually reduce the number of football pitches in the city). Please correct this appendix point with the correct information.</p> <p>And all the current reference links (in green type) in this Appendix currently do not appear to correctly link to the relevant support information referred to (incorrect hyperlink indexing). Local Plan, document page 139 – NE3 paragraph 7.26 The hyperlink to the “Council Plan” results in an error 404 no page found.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been</i>	No

*included in the representation.
However, the links provided
may contain additional details,
such as images, tables, or
tracked changes, if applicable.*

Policy/Evidence base document	Integrated Impact Assessment
Name of respondent (or client)	Jonathan Marmont
Personal reference number	ANON-AQTS-32ZM-5
Full reference number	ANON-AQTS-32ZM-5/5/Integrated Impact Assessment
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	I disagree with the Integrated Impact Assessment Categorisations applied to sites CU14, CU34 and CU45. IIA Objective 1, 2 4 & 7 follow a similar methodology for assessment, and the comments below therefore apply to all these objectives. While the distance to the nearest GP (Whiteley Surgery) is around 1,100 metres, this practice is already under severe pressure. It is not adequately meeting the needs of existing residents and I am aware that some new residents of North Whiteley are already being turned away. This will result in additional distances travelled to the next nearest surgery (Brook Lane – 2,500m and Botley – 2,400m) and therefore further negatively impact the environment.
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided</i>	No

*may contain additional details,
such as images, tables, or
tracked changes, if applicable.*

Policy/Evidence base document	Integrated Impact Assessment
Name of respondent (or client)	YMCA Fairthorne Manor Group Philipa Spicer
Personal reference number	BHLF-AQTS-328Y-F
Full reference number	BHLF-AQTS-328Y-F/14/Integrated Impact Assessment
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	Legally compliant: no Sound: no Duty to Cooperate: no
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Form (Table of policies) Letter (commenting on Policies and Evidence Base - includes vision document)) Supporting document 1 (Vision Document) Supporting document 2 (Vision Document)

Policy/Evidence base document	Integrated Impact Assessment
Name of respondent (or client)	Bargate Homes Limited
Personal reference number	BHLF-AQTS-328D-T
Full reference number	BHLF-AQTS-328D-T/4/Integrated Impact Assessment
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>This comment has been summarised – see supporting information for full response</p> <p>The IIA has been prepared to include the SA and SEA requirements to support the preparation of the local plan. The SA appraises five options for growth, individual site allocations and local plan policies against sustainability objectives. Bargate support the findings of the options appraisal which concludes that of the options assessed, Option 1A forms the most appropriate basis of the local plan development strategy. However, given the national requirement to significantly boost housing supply, it is considered that a further option should be considered: a higher growth scenario. This alternative option with a higher housing requirement should include more allocations overall, including more within the MTRA where it has been demonstrated that there is a sufficient supply of sites in sustainable locations. Notwithstanding this, Bargate does support Option 1A in that it seeks to deliver a relatively high number of small scale sites dispersed across different locations to meet housing needs. Should a further growth scenario be considered, it is suggested that the emphasis on a high number of small scale sites should be retained, for the reasons set out above and to help maintain local service provision.</p> <p>Welcome increased growth, relative to other options, in the Market Towns and Rural Areas (MTRA). The SA notes the lengthy timescales and difficulties associated with strategic sites and/or new settlements and therefore, it is right that option 3 is not progressed. There is some confusion over the policy reference in respect of the appraisal of Policy DEN1: Denmead Neighbourhood Plan Designated Area on pages 576 - 577 of the SA, where there is reference to D1 and NA3. This requires clarification/amendment.</p> <p>The appraisal of DEN1 shows uncertainty in respect of a number of the objectives; due to the fact that the precise location of site allocations is not yet known. This is despite the supporting text confirming that Denmead is a larger rural settlement with local access to a number of services where levels of CO2 emissions per commuter are lower than in other settlements (paragraph 5.183). Much of the uncertainty against environmental objectives (e.g. biodiversity and geodiversity, historic environment and landscape) can</p>

	<p>be avoided/mitigated through site selection and in this regard, it is noted that land to the north of Denmead is generally more constrained by these factors.</p> <p>It is considered that the uncertainty reflected in the SA appraisal does not accurately reflect the sustainability benefits of the settlement and individual sites. This uncertainty could be reduced through direct, local plan allocations. The SA confirms that Denmead is a sustainable location, it reinforces our view that an allocation of only 100 dwellings out of a capacity of over 1,100 dwellings, does not maximise the potential of the settlement or seek to “significantly boost housing supply” in sustainable locations.</p> <p>While sites are to be allocated through the Neighbourhood Plan, the SA appraises individual sites against the SA objectives. There is some concern that the SA of the local plan lacks granularity, resulting in overly generalised appraisals. Of particular concern is the blanket approach taken when assessing sites against objectives 1, 2 and 7. The same definitive distance criteria are applied to all three objectives and no weighting is incorporated. A site which is 400 metres from a facility is assessed more favourably than a site which is 401 metres away when in reality, this would make no difference as to whether or not a car would be used for the journey. This definitive application of the criteria does not reflect the sustainability benefits of the Site South of Forest Road. The Vision Document submitted as part of our Regulation 18 representations, demonstrates that the Site fully adopts the principles of a 20- minute neighbourhood, making it a highly sustainable location for development. There are a wide range of facilities which are available within 20 a minute walk, with additional facilities including a GP, supermarket and secondary school all being available via a bus or cycle journey of less than 20 minutes.</p>
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	
<p>What is your suggested wording or text for the policy?</p>	
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	
<p>Have you submitted supporting information?</p>	<p>Yes Form (commenting on Policies and Evidence Base - includes pictures) Letter (commenting on Policies and Evidence Base - includes pictures)</p>

All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.

Policy/Evidence base document	Integrated Impact Assessment
Name of respondent (or client)	VIVID Housing
Personal reference number	BHLF-AQTS-3287-D
Full reference number	BHLF-AQTS-3287-D/2/Integrated Impact Assessment
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	Corrections are needed to the IIA (Site DE22)
What modification(s) are necessary to make the policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Form (commenting on policies and evidence base)

Policy/Evidence base document	Integrated Impact Assessment
Name of respondent (or client)	Macra Ltd
Personal reference number	BHLF-AQTS-328W-D
Full reference number	BHLF-AQTS-328W-D/7/Integrated Impact Assessment
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>This comment has been summarised – see supporting information for full response</p> <p>With respect to Land at Mayles Farm, Wickham (Site Ref. WI24), the IIA reached the following conclusions. Excerpt – Integrated Impacts Assessment (IIA) – Appendix 2 – WI24 Mayles Farm, Wickham IIA. The Council consider that the site scored minor negative due to the site not being within reasonable proximity of a secondary school or railway station. This is the same conclusion reached for all sites within Wickham settlement, given that these services are not catered for within the settlement. In this respect the site is just as suitable for allocation as the selected strategic allocations for Wickham.</p> <p>The site is appropriately close to services and facilities such that there will be no significant bearing upon the need to use a private vehicle to access most day to day facilities. Other services facilities which are not present within Wickham will require use of a private vehicle, which is the same for any site at Wickham settlement. The site is not located within an area subject to a high background noise environment and is located in an appropriate proximity of health services and facilities and access to public open space. Insufficient weight has been given to the significant public open space opportunities and sports provision that would be delivered by this site if allocated. It will be necessary for many people to travel to their place of work from the site. The site will have a negligible impact upon this objective as the land is not proposed to be designated for employment provision and is not in employment use.</p> <p>It is irrational to conclude that the site will give rise to a significant negative impact upon biodiversity interest. There is no significant interest present on site, the land is of a low biodiversity value, and its delivery for development would provide significant and overriding opportunities for biodiversity net gain (BNG) having regard for the sheer quantum of greenspace that can be delivered by the site. The site should have scored neutrally or minor positively in this regard.</p>

	<p>The site does not have any significant landscape sensitivity, as the Landscape Visual Impact Assessment (LVIA) prepared by UBU Design and submitted alongside these representations concludes. The site should have scored neutrally on this point.</p> <p>The site will not impact significantly upon any heritage assets, and there is only a single Grade II listed dwelling within a reasonable proximity of the site. It is not considered that the significance of this heritage asset will be impacted by the development. The majority of the site is low value greenfield land, which is utilised for low impact grazing. The land comprises predominantly low grade agricultural land, which is not best and most versatile land. We consider it irrational for the site to have been scored significant negative in this regard. The site will have a negligible impact upon this objective as it is not located within any groundwater source protection zones. The site is located outside of any zones of fluvial or surface water flood risk with respect to those areas that will be brought forward for development. We do not agree with many of the conclusions reached by Winchester Council in respect of the IIA for Land at Mayles Farm, Wickham. It should be noted that almost identical conclusions were reached within the IIA for Site WI03 – Land at Southwick Road/School Road. We consider that there is no appropriate justification or rationale for the exclusion of Land at Mayles Farm, Wickham as a strategic allocation on this basis.</p> <p>The conclusions reached within the IIA for Site WI02 – Land at Mill Lane, Wickham are unreasonable and irrational, having regard for the conclusions otherwise reached in respect of both Land at Mayles Farm, Wickham, and Site WI03 – Land at Southwick Road/School Road. We do not consider that this site is in any manner more sustainable in terms of its proximity to the settlement and services and facilities than the other two sites selected and moreover there are significant negative landscape impacts that would arise from the delivery of this site within an enclosed rural landscape which appears divorced from the settlement, and which would materially change Mill Street to the detriment of the character of this historical route into Wickham settlement from the South Downs National Park to the north. There is absolutely no rationale for scoring the other two sites as minor negative on objectives IIA1, IIA2 and IIA4 and this site as Minor Positive in this regard. This is completely inconsistent and unjustified.</p> <p>WI02 Mill Street, Wickham. We consider that the conclusions of the IIA are fundamentally flawed with respect to the sites assessed at Wickham and indeed this assessment has influenced the decisions taken with respect to those sites to select and formally allocate for housing development. We consider that there are significant and material benefits to be derived from Land at Mayles Farm, Wickham, which have been ignored, and in particular with respect to Site WI02 – Land at Mill Lane, Wickham, the conclusions reached are out of step with the other assessments and irrational.</p>
What modification(s) are necessary to make the	

<p>policy legally compliant or sound?</p>	
<p>What is your suggested wording or text for the policy?</p>	
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes Form (listing policies and submitted document) Letter (commenting on Policies and Evidence base) Supporting documents (Landscape Appraisal and Maps)</p>

Policy/Evidence base document	Integrated Impact Assessment
Name of respondent (or client)	Wates Developments Ltd
Personal reference number	BHLF-AQTS-328X-E
Full reference number	BHLF-AQTS-328X-E/22/Integrated Impact Assessment
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>This comment has been summarised – see supporting information for full response</p> <p>Wates view is that many of the sustainability challenges identified in the IIA are either overstated, entirely manageable or mitigatable, or have not been appropriately balanced with the benefits of development. IIA1: climate change mitigation: It is accepted that greenfield development options are unlikely to ‘score’ in a very positive way when considering climate change mitigation or adaptation. However, the approach to development, the inclusion of modern construction techniques, and the choice of materials will make a difference as will the layout of development which will consider the orientation of buildings and the inclusion of open space and a biodiversity net gain. IIA2: travel and air quality: The Council could consider a weighted response to this criterion, which places sites at Market Towns in a different assessment to those close to urban centres, because the need for homes will not be met all at the edge of urban areas, and there is a need to support local town and village communities – their social needs, and the continued viability of rural businesses – which should be balanced with the need to travel. IIA4: health and wellbeing: Development site options in more rural settings are likely to have access to the countryside, and open space so a positive score here is supported.</p> <p>IIA7: services and facilities: It is disappointing to see a ‘minor negative’ assessment for this criterion. Whilst New Alresford is not a major urban centre, like Winchester, it is a ‘second tier’ market town with a good level of services and facilities. It might be more appropriate to assess sites relative to the position of the associated settlement in the hierarchy. In this way, development options would more effectively recognise the value of development in town and village locations which support local community facilities to maintain vitality. IIA8: economy: It is difficult to understand this assessment as ‘negligible.’ Whilst the site is unlikely to provide long term employment, part of the justification for development in more rural locations, including market towns – as recognised in the NPPF – is to support the local, and rural economy, and smaller town centres. This is to support smaller local enterprise through more users in the local community (an increase in the population) and thus more spending, but also providing the opportunity for people to live closer to where they might work in more rural areas.</p>

	<p>IIA9: biodiversity and geodiversity: There is a tension here, where the assessment in the IIA is a “significant negative” but the SHELAA assessed all biodiversity matters as ‘green.’ Wates tends towards the latter assessment, because it is confident that biodiversity will be managed, and a net gain achieved, in any development. IIA10: landscape: Wates questions an assessment of the site which concludes that it has a medium or higher overall landscape sensitivity. The site is relatively discrete and limited in scale, and cannot be seen from many public viewpoints. The site lies adjacent to existing residential development. The site is also enclosed by hedges, roads, and slightly further out by the B3047 (Alresford) Road and the A31. A full landscaping scheme that supports the sites development can be created to manage and mitigate any residual effects. IIA11: historic environment: Wates agrees with the ‘negligible’ assessment here, as no heritage assets will be significantly affected.</p> <p>IIA12: natural resources: Wates notes the same tension here between the IIA and the SHELAA assessment as for biodiversity. Consistency is called for, and Wates seeks clarification regarding minerals safeguarding on the site. Given the need for greenfield development across the district it is also likely that some agricultural land will be lost, so this should not be seen as a total impediment to development. IIA13: water resources: The challenges of water management in the area is noted by Wates, and is also noted as a general challenge to development, not necessarily a site specific matter. IIA14: flood risk: Wates agrees with the ‘negligible’ assessment here, as the site is almost entirely in Flood Zone 1.</p> <p>Having reviewed the IIA; Land to the rear of Thody's would appear to be appropriate to allocate for development. None of the constraints to development are insurmountable, and in fact, much of the assessment supports the sites as suitable and sustainable for development and it should be allocated in the Local Plan.</p>
<p>What modification(s) are necessary to make the policy legally compliant or sound?</p>	
<p>What is your suggested wording or text for the policy?</p>	
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	

Do you want to participate in hearing sessions for this policy?	
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Form (refers to letter) Letter (commenting on policies and evidence base)

Policy/Evidence base document	Integrated Impact Assessment
Name of respondent (or client)	Harding Holding Limited (Simon Harding)
Personal reference number	BHLF-AQTS-32QY-8
Full reference number	BHLF-AQTS-32QY-8/14/Integrated Impact Assessment
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>This comment has been summarised – see supporting information for full response</p> <p>Harding Holding supports the methodology of the IIA, and specifically SA elements, but raises significant concern to whether the SA element achieves sustainable development.</p> <p>Sustainable Development is a broad term that describes development that meets the needs of the present without compromising the ability of future generations to meet their own needs. A key element of the economic and social arms is the delivery of homes in the right places at the right time for the needs of the present and future generations.</p> <p>Harding Holding cannot agree that the IIA objective 6: Housing to a decent standard, encompassing 6.1 and 6.2 has been assessed correctly and that the plan would result in sustainable development in relation to housing supply and housing delivery during the plan period.</p> <p>As noted further in paragraphs 5.7 – 5.9 below, there is a lack of policy that specifically details sustainable development. In fact, Sustainable Development is only written 13 times in the 578 pages of the draft Plan. It is not a term that is referenced in the Vision or Objectives of the Plan, the only reference to sustainable development in policy text is in Strategic Policy D5- Masterplans. It is unusual not to see sustainable development as a foundation or “at the heart” to decision making (Paragraph 10 of the NPPF), as set out in Section 2 of the NPPF.</p> <p>Harding Holding has no further comments on the Strategic Environmental Assessment (SEA), the Habitats Regulation Assessment (HRA), the Health Impacts Assessment (HIA) and the Equalities Assessment (EqA), however, as they come as a package under the IIA, it is an extension of Harding Holding’s concerns regarding the SA that they also object to these documents, considering them unsound.</p>
What modification(s) are necessary to make the	

policy legally compliant or sound?	
What is your suggested wording or text for the policy?	
Do you agree with how the policy will be monitored?	
If no, please explain	
Do you want to participate in hearing sessions for this policy?	
Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i>	Yes Form (refers to letter) Letter (Commenting on policies and evidence base) Supporting information (Map)

Policy/Evidence base document	Integrated Impact Assessment
Name of respondent (or client)	Croudace Homes (Alison Walker)
Personal reference number	BHLF-AQTS-32QZ-9
Full reference number	BHLF-AQTS-32QZ-9/7/Integrated Impact Assessment
Legally compliant?	
Sound?	
Complies with duty to co-operate?	
Policy/Document comment	<p>This comment has been summarised – see supporting information for full response</p> <p>Croudace supports the methodology of the IIA, and specifically SA elements, but raises significant concern to whether the SA element achieves sustainable development. A key element of the economic and social arms is the delivery of homes in the right places at the right time for the needs of the present and future generations.</p> <p>The housing need of Winchester, including Affordable Housing, are set out below in section 4. This section concludes that Winchester has failed to plan for sufficient housing for its current and future residents. Croudace cannot agree that the IIA objective 6: Housing to a decent standard, encompassing 6.1 and 6.2 has been assessed correctly and that the plan would result in sustainable development in relation to housing supply and housing delivery during the plan period.</p> <p>There is a lack of policy that specifically details sustainable development. In fact, Sustainable Development is only written 13 times in the 578 pages of the draft Plan. It is not a term that is referenced in the Vision or Objectives of the Plan, the only reference to sustainable development in policy text is in Strategic Policy D5-Masterplans. It is unusual not to see sustainable development as a foundation or “at the heart” to decision making (Paragraph 10 of the NPPF), as set out in Section 2 of the NPPF.</p> <p>Croudace has no further comments on the Strategic Environmental Assessment (SEA), the Habitats Regulation Assessment (HRA), the Health Impacts Assessment (HIA) and the Equalities Assessment (EqA), however, as they come as a package under the IIA, it is an extension of Croudace’s concerns regarding the SA that they also object to these documents, considering them unsound.</p>
What modification(s) are necessary to make the policy legally compliant or sound?	

<p>What is your suggested wording or text for the policy?</p>	
<p>Do you agree with how the policy will be monitored?</p>	
<p>If no, please explain</p>	
<p>Do you want to participate in hearing sessions for this policy?</p>	
<p>Have you submitted supporting information? <i>All relevant information related to the specific policy or allocation has already been included in the representation. However, the links provided may contain additional details, such as images, tables, or tracked changes, if applicable.</i></p>	<p>Yes Form (refers to letter) Letter (commenting on policies and evidence base) Supporting document 1 (Vision Document) Supporting document 2 (Map - Land east of Highbridge Road, Colden Common) Supporting document 3 (Indicative layout)</p>

WCC Response:

Comments noted. Discussions have been held between the Council and Natural England to resolve the matters raised. Further work on air quality has been undertaken – there is an agreed Statement of Common Ground dated September 2024.

[An Air Quality Assessment](#) has been undertaken to address Natural England’s comment regarding air quality issues relating to Bushfield Camp and this is available on the Local Plan website.

The [Nutrients Topic Paper](#) has been updated and is available on the Local Plan website.

WCC Recommended Changes arising from the representations:

No changes recommended.

An Air Quality Assessment is currently being undertaken to assess the air quality impacts in relation to the compensatory habitats. Once this work has been concluded and agreed with Natural England, an updated SoCG will be agreed with Natural England.