

**Consultation comments on policy W10 – Former River Park leisure centre site**

- Support - 4
- Neither support of object - 9
- Object - 18

The changes to the supporting text and the Local Plan policies have not only been informed by the responses to the Regulation 18 consultation but they have also taken on board any additional feedback that has come out of discussions/meetings with statutory consultees and members in order to improve the clarity and understanding of the contents of the Local Plan.

<b>Comments which neither support nor object to policy W10 – Former River Park leisure centre site</b>		
<b>Respondent number</b>	<b>Comment</b>	<b>Officer comment</b>
ANON-KSAR-NKYP-K	<p>Note that the multi-use games area (MUGA) that was previously on this site, and which was destroyed to make way for the skate park, has still not been replaced in line with existing Local Plan policies.</p> <p>We wish to reiterate the vital importance of any redevelopment of this site providing for public/community uses. This must include local experts and interest groups being fully engaged in co-creating the development. For example, there is a dearth of publicly</p>	<p>Points noted. The NERT team have confirmed that there are no plans to put a MUGA at Riverpark. The North Walls recreation area currently comprises tennis courts, a 3G 'astro turf' 5-a-side football games area, football pitches, rugby pitches, cricket nets, and an informal kick about area at the Park. Whilst there is no MUGA the North Walls Recreation Ground has a wide range of recreational facilities that cater for different age groups. <b>Recommended Response:</b> No Change.</p> <p>Points are noted. However, discussions are ongoing with Southampton</p>

	<p>accessible music performance space in Winchester currently, so there are no major 'gigs' in the city and nowhere for larger classical concerts to be offered. If the proposed performance space is to meet this need, then local musicians and performers must be involved in the design of the space and its subsequent programming.</p> <p>Finally, it is important to note the high level of community interest in developing a new lido on this site. (The city's previous lido was demolished by WCC in the late 1970s.) This is a worthwhile and potentially very exciting proposal, which is consistent with wider national trends, and the potential to include it in the site's redevelopment should be fully explored. Ultimately, if such a facility cannot be accommodated here, then WCC should engage with the community group concerned to explore other options, including the potential for co-location with other leisure facilities and/or the use of another area of North Walls/River Park/St Bartholomew ward.</p>	<p>University. There are no current plans or funding available to consider a Lido on this site. <b>Recommended Response:</b> No Change.</p>
ANON-KSAR-N8UN-T	<p>Housing could be built on the River Park site, as I wrote earlier.</p>	<p>Point noted. However, the former River Park Leisure centre site is located in Flood Risk area and as groundwater levels are less than a metre below the surface this would not be an appropriate location for residential development. <b>Recommended Response:</b> No Change.</p>
BHLF-KSAR-N8Z7-8 South Downs National Park Authority	<p>In terms of the proposed allocations, the following allocations will need to be amended to reference Policy NE8 (South Downs National Park) and set out that the proposed development sites and/or neighbourhood plan (NP) designated areas will be within the setting of the SDNP. As such, any development will need to be sensitively located and designed to avoid or minimise adverse impacts on the SDNP. The above relates to the following: Policies BW3 (Tollgate Sawmill), CC2 (Colden Common Farm), CC3 (Land</p>	<p>Points noted. However, it is important to read the Local Plan as a whole. <b>Recommended Response:</b> No Change.</p>

	<p>at Main Road), D1 (Denmead NP Designated Area), KW2 (Land adjoining the Cart &amp; Horses PH), NA3 (New Alresford NP Designated Area), OT01 (Land east of Main Road), W5 (Bushfield Camp), W6 (Winnall), W10 (Former Riverside Leisure Centre), WK1 (Winchester Road and Mill Lane), and WK2 (The Glebe).</p> <p>Policy W10 – Former River Park Leisure Centre (Class Use: F1) The site is within the urban area and is separated from the Winnall Moors Nature Reserve and the SDNP by vegetation and other recreational uses. The redevelopment of this brownfield site has the potential to improve the area through the introduction of a more attractive building. That said, if a taller building is proposed, then visibility from the SDNP may be increased and it will be important to consider the quality of the building. With the above in mind, the proposed redevelopment must not adversely affect the setting of the SDNP, and so Criterion (v) is welcomed. In addition, the required master plan will need to be landscape-led due to the site’s location within the setting of the SDNP.</p>	<p>Points noted and support welcomed.</p>
<p>BHLF-KSAR-N8BQ-A Historic Environment</p>	<p>Para 12.89 The Bridge is not scheduled, it is a listed building; and the Hyde Gateway is both a Scheduled Monument and a Listed Building.</p> <p>Full doc in SP for mark ups - Hyde Abbey Gardens which includes the remains of Hyde Abbey, a Benedictine monastery, extends into the car park and grounds of the adjacent former Leisure centre complex. Hyde Gateway, which is located opposite St Bartholomew`s Church in King Alfred`s Place, is a Scheduled Monument and Listed Building and the Bridge which is a Listed Building are Scheduled Monuments, are the only substantial known remains associated with the Abbey that still remain. As the western boundary of the site is also located adjacent to the Winchester Conservation Area boundary. Any development</p>	<p>Points noted. <b>Recommended Response:</b> Change the wording of paragraph 12.89 as follows.</p> <p><b>Hyde Abbey Gardens which includes the remains of Hyde Abbey, a Benedictine monastery, extends into the car park and grounds of the adjacent former Leisure centre complex. Hyde Gateway, which is located opposite St Bartholomew`s Church in King Alfred`s Place, is a Scheduled Monument and Listed Building. The Bridge is also a Listed</b></p>

	<p>will need to take this into consideration Abbey remains above and below ground, both scheduled and unscheduled but potentially of national importance, and impacts on their significance as part of the design process.</p> <p>12.91 and policy W10  We welcome the text in paragraph 12.91 which acknowledges the historical importance of the site and seeks to bring that to the fore. We suggest minor changes to the policy that enable this to be carried forward also in policy terms.</p> <p>Full doc in SP for mark ups-  Development proposals for the former River Park Leisure centre site as shown on the Policies Map, will be granted planning permission for development of F.1 use (Learning and non-residential institutions), including a Performance Space, provided that detailed proposals accord with the Development Plan and demonstrates how proposals will accord with the following:</p> <p>iii. The proposals for the design must ensure strong connectivity with the surrounding landscape and townscape - visually, physically and ecologically, and are informed by and sensitive to the heritage significance of the site, including the Abbey remains</p>	<p><b>Building and a Scheduled Monument. These are the only substantial known remains associated with the Abbey that still remain. As the western boundary of the site is also located adjacent to the Winchester Conservation Area boundary. Any development will need to take this into consideration Abbey remains above and below ground, both scheduled and unscheduled but potentially of national importance, and impacts on their significance as part of the design process.</b></p> <p>Comments noted and support welcomed.</p> <p>Points noted. Recommended Response: Amend criteria iii as follows:</p> <p>The proposals for the design must ensure strong connectivity with the surrounding landscape and townscape - visually, physically and ecologically; <b>and are informed by and are sensitive to the heritage significance of the site, including the Abbey remains;</b></p>
--	--	---

<p>BHLF-KSAR-N86Z-7</p>	<p>Main &amp; Branch St Pauls St Clements Partnership</p> <p>NHS Hampshire and Isle of Wight ICB - Primary Care Response</p> <p>The GP surgeries that serve these potential sites are currently over subscribed by 10,900 patients of October 2022. The additional dwellings from the local plan will add a further 11,100 patients and in order to mitigate this the NHS will be seeking financial contributions to increase the primary care space by a further 888 m2</p> <p>The ICB has invested significant revenue and capital funding from its limited budget into the Winchester City practices to enable them to grow their infrastructure to meet local need.</p> <p>St Clements Surgery is being supported by the ICB to build new premises through a third party developer, which the ICB will fund through the rental reimbursement of the lease upon completion. This will provide 1003m2 of General Medical Services space, an increase of 283m2, and 78m2 of new Winchester City Primary Care Network General Medical Services space, in order to grow local primary care services to meet current demand, and up to 2,300 of additional population. This is based on the currently adopted Local Plan. Further capacity will be required to meet a significantly expanding population should the SHELAA sites be agreed and potentially developed.</p> <p>St Paul's Surgery have been supported in 2022/23 through an NHS Improvement Grant, to complete Phase 3/3 of their expansion plans, enabling the practice to create three new treatment rooms. Previous phases, some of which have been self funded, has enabled the Surgery to add three additional consultation rooms and a new waiting room. These capital investments have enabled the</p>	<p>This site is allocated for Learning and Development and it will not put an extra strain on the NHS Services. <b>Recommended Response:</b> No Change.</p>
-------------------------	--	---

	<p>practice to grow with their increasing patient list, in line with the currently adopted Local Plan. Further capacity will be required to meet a significantly expanding population should the SHELAA sites be agreed and potentially developed.</p> <p>Friarsgate Surgery moved to purpose-built leased accommodation in 2009, which included additional space for the practice to grow into to meet additional housing development, including the multiple phasings of Barton Farm. Further capacity will be required to meet a significantly expanding population should the SHELAA sites be agreed and potentially developed.</p> <p>The three Winchester surgeries and PCN have been clear with the ICB that it does not feel able to absorb any further increases in population due to agreed development without significant further investment in primary care infrastructure. We are pleased to note: Ref policy W10: "Plans are being developed to improve health care provision in the wider area"</p> <p>Due to the additional healthcare activities that will derive from the Local Plan we believe that there should be references to healthcare in the following policies W1,2,3,4,7,8 and 9 to inform potential developers of the requirement for these impacts to be mitigated.</p>	
<p>BHLF-KSAR-N86T-1 Hampshire County Council (Transport)</p>	<p>Policy W10 - a learning facility and non-residential institutions (use class F.1) at the former River Park Leisure Centre Site This site is in a very sustainable location; it is a short walk from the bus stop at St Peter's on North Walls, is a walkable and cyclable distance to the city centre and has an existing low traffic signed cycle route via Park Avenue. The County Council would support this site having very low on-site car parking provision compared to the current provision (which was based on parking demand from when it was a leisure centre).</p>	<p>Points noted but the car parking provision at the site also serves the North Walls Recreation Ground and it is a park and stride car park. <b>Recommended Response:</b> No change.</p> <p>It is important to read the Local Plan as a whole as cycle provision is dealt with</p>

	<p>As part of any redevelopment, the County Council would welcome a reduction in car parking, which would allow improvements to the pedestrian environment to create a safer, wider walking route from Hyde to St Bede's CofE Primary School entrance. Some form of secure cycle parking for students and staff should be incorporated into plans, as well as showers and lockers, to encourage cycling to/from the site. As mentioned in comments regarding St Peter's Car Park, there is a need to improve West - East cross city cycle infrastructure, so good connections into any new West - East provision should be delivered as part of any redevelopment of this site.</p>	<p>under Policy T3. <b>Recommended Response:</b> No change.</p>
<p>BHLF-KSAR-N86F-K Natural England</p>	<p>W10 Former River Park Leisure Centre site Policy Due to the close proximity to the Winnall Moors nature reserve and River Itchen SSSI and SAC, any forthcoming development will require assessment and careful design to avoid impacts from poor quality surface water run-off, such as incorporation of naturalised SuDS features. We would encourage development of this site to retain multifunctional green space, which could be designed and managed with biodiversity benefits.</p>	<p>Points noted. <b>Recommended Response:</b> Change paragraph 12.95 as follows: <b>Due to the close proximity to Winnall Moors nature reserve and River Itchen SSSI and SAC, any development will need to be carefully designed to avoid impacts of surface water run-off through the incorporation of naturalised SuDS features, multifunctional green space that is designed and managed with biodiversity benefits. As the site is in</b> <del>in a Due to</del> an area of flood risk the redevelopment of the site will not include any student halls of residents. This has now been clarified in the supporting text.</p>

**Comments which object to policy W10 – Former River Park leisure centre site**

<b>Respondent number</b>	<b>Comment</b>	<b>Officer comment</b>
ANON-KSAR-NKEM-V	keep as green open space for leisure activities	Points noted. However, there are currently discussion underway with Southampton University. <b>Recommended Response:</b> No change.
ANON-KSAR-NKBD-G	I do not oppose the redevelopment of the old leisure complex. I do object to the City Council trying to break the legal trust in which the land is held. the land belongs to the people of Winchester. This is an area that should be use to benefit the public. The Rive Itchen must be protected from unnecessary development.	See above response.
ANON-KSAR-NKJE-S	This area should be kept as a site for open space for public enjoyment.	See above response.
ANON-KSAR-NKYT-Q	This site should remain under public ownership managed by WCC as before. If any elements of the current building could continue to be used or re-purposed - indoor sports facilities, lavatories/showers, cafe, then they should be retained. If the rest of the building is unsafe, then it should be demolished and the land returned to the public realm as 'open green space' or alternatively an 'adventure play area' for older children, like the equipment on the open space at Abbots Barton. The existing bowls club and skate park should also be retained. Nothing else should be built, including paved areas or other 'enhancements' previously proposed, on the rest of the River Park site, to the detriment of biodiversity and 'greening' to mitigate against global warming.	See above response.
ANON-KSAR-N8E3-F	I object strongly to the proposal to lease the former leisure centre to the University of Southampton. This was done without any	See above response.



	proper public consultation and removes what should be a city asset from having any benefit for the citizens of Winchester.	
ANON-KSAR-NKJ6-A	<p>Again I am not opposed to development in this area but do oppose this piecemeal approach to a hugely important part of Winchester, a stunning area that should be planned to maximise its potential.</p> <p>At present it is poorly planned and laid out; it would be tragic not to take the opportunity to create a wonderful part of town and not repeat past mistakes - the siting of the play area, the skate park and buildings that do not add value to the overall site to name a few. The park is a fantastic site but in poor condition, it appears sad and unloved even if well used, development should provide the opportunity to ensure that buildings and facilities work together for the enhancement of both, not be separated as shown on this plan.</p> <p>The site wide masterplan should include the whole area of existing buildings, the whole park and connections for pedestrians and cyclists, with minimal parking. It is the most important open space in the city and should serve the whole city, the CWR area in particular - it is a destination park. The buildings, facilities and park need to be planned to reinforce each other's value.</p> <p>Partnership working will be essential.</p>	<p>See above response.</p> <p>There are no plans under the Local Plan to do any work to the Recreation Area which is the reason why criteria i of Policy W10 requires a masterplan to only cover the site that has been allocated in the Local Plan. It is, however, important as part of the masterplanning process that it considers and assesses how the site is used in conjunction with the rest of the Recreation Area/nearby area.  <b>Recommended Response: No Change.</b></p>
ANON-KSAR-N8GD-2	In Policy W10 viii, permeability should be explicitly stated to mean for pedestrians, cyclists & Motability scooters. All should be able to cross the site, go round the site, and potentially through the site.	Points noted. Permeability is a matter that can be considered and assessed as part of the masterplanning process. It is important to read the Local Plan as whole

		<p>as sustainable and active travel is dealt with in a separate topic.</p> <p>This is a very specific issue that can be dealt with as part of the design process. As part of the design process, an applicant will be required to prepare and submit a Design and Access Statement that will have needed to consider and take into account all users' needs irrespective of gender, age or disability. <b>Recommended Response:</b> No Change.</p>
<p>ANON-KSAR-NK2C-Y Southern Water</p>	<p>We have made an initial assessment of this site and ascertained that Southern Water's infrastructure crosses the site, which needs to be taken into account when designing the layout of any proposed development. An easement width of 6 metres or more, depending on pipe size and depth, would be required, which may affect site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting.</p> <p>Proposed amendment</p> <p>Accordingly, we propose the following additional criterion for Policy W10:</p> <p>Layout of the development must be planned to ensure future access to existing underground infrastructure for maintenance and upsizing purposes.</p>	<p>Points noted. <b>Recommended Response:</b> Add additional criteria to Policy W10 <b>The layout of the development must be planned to ensure future access to existing underground infrastructure for maintenance and upsizing purposes.</b></p>
<p>ANON-KSAR-N8GA-Y</p>	<p>Please see the introductory comments to T1</p>	<p>Points noted. However, these are all detailed issues that can be considered as</p>

	<p>Suggested revised text. We will send a tracked changes version which will highlight the changes we are suggesting:</p> <p>viii. The proposals are designed to be permeable for walking, cycling and mobility scooters, but not for standard motorised road vehicles, maximise public accessibility that includes publicly accessible performance/events space that benefits the City and is linked to the nearby Primary School, the outdoor skate park, the indoor bowling facility and links to the nearby educational institutions. The proposals must deliver improved, safer walking, cycling and mobility scooter links through and around the site, specifically between Hyde Abbey Garden, North Walls Recreation Ground, the path alongside the stream to Nuns Road, the path to Park Avenue, Gordon Road and St Bede school. These routes must be established in preference to any new buildings, new car parking or retention of existing car parking in the area.</p> <p>ix. Full secure cycle parking and cycle and mobility scooter charging facilities are provided for the development's users</p> <p>x. Arrangements are made to ensure that car parking facilities are available only to support the uses and sporting activities on the North Walls Recreational Area and do not remain a low price park-and-walk facility for the city centre</p> <p>xi. The proposals do not include residential development but where a proposal could lead to additional accommodation requirements they come forward with a strategy, implementation, an active travel plan, and a full transport emissions assessment.</p>	<p>part of the masterplanning process. It is important to read the Local Plan as whole as sustainable and active travel is dealt with in a separate topic. This is a very specific issue that can be dealt with as part of the design process. As part of the design process, an applicant will be required to prepare and submit a Design and Access Statement that will have needed to consider and take into account all users' needs irrespective of gender, age or disability. <b>Recommended Response:</b> No Change.</p> <p>It is important to read the Local Plan as a whole as Policy T2 covers this point. <b>Recommended Response:</b> No Change.</p> <p>This is not a matter for the Local Plan. <b>Recommended Response:</b> No Change.</p> <p>This site is not suitable for residential development as it is located in an area at risk for flooding. <b>Recommended Response:</b> No Change.</p>
--	--	---

<p>ANON-KSAR-N89G-Q</p>	<p>I strongly object to the plan to hand this public asset over to private use by the university. University facilities are not used by the local community and Winchester residents will not gain anything from the proposed development of this site. The existing university buildings on Park Avenue are in no way integrated with the city. A fashion showcase for one week a year is a negligible contribution to the area, especially when compared to a leisure centre that was publicly accessible every day of the year.</p> <p>The university clearly does not need this site. If they were short of space for development then they would have built something on the former police station site. Instead that has remained vacant for at least 5 years. The university blocks access to River Park through that site when it could be a low traffic easy way to walk or cycle to the park.</p> <p>This site should not be designated as a learning location when it was previously a sports and leisure site. It should be designated as a sports, leisure or recreation site.</p> <p>If it is essential that this site is used to generate money then I would prefer that housing was built on the site of the leisure centre instead of university buildings. At least then some residents would benefit from the site.</p>	<p>Points noted. However, there are discussions underway with the Southampton University.  <b>Recommended Response:</b> No change.</p>
<p>ANON-KSAR-N8WH-P</p>	<p>I strongly believe the policy for the a former River Park Leisure Centre site should maintain the site as a public space, preferably a local green space. I believe the site should be maintained as part of the park and remain open to the public. Leasing the land long term to a developer such as University of Southampton will limit public access massively. The site is unsuitable for further urban development given its location next to the river and is prone to flooding. Parkland, sports facilities (including</p>	<p>Points noted. However, there are currently discussion underway with Southampton University.  <b>Recommended Response:</b> No change.</p>

	<p>boating/canoeing/kayaking given the riverside location) or even managed wetlands would be a far greater benefit to the public and the environment.</p> <p>The University of Southampton were also given the former police station site on the North Walls and have done nothing to improve or develop this site, so there is no evidence that they would improve the site. I don't believe the University of Southampton or another private developer would add value to the River Park site, and any development there would only benefit the university rather than the city as a whole.</p>	
ANON-KSAR-N8ES-F	<p>Object to "Whilst the skate park should be retained on the site, opportunities could be explored" Executive council members gave public assurances that there were no circumstances in which the skatepark would not be retained. The policy should be equally unequivocal.</p>	<p>Points noted. Paragraph 12.94 is very clear that the skate park will be continued to be managed and maintained by the council but it is saying is that there might be opportunities to improve/enhance it as part of the redevelopment of the site. <b>Recommended Response:</b> No change.</p>
ANON-KSAR-NKQN-9	<p>There is nothing about active travel routes through the site at all! WCC is well aware of the walking, cycling and scooting issues affecting users here, especially children and families going to St Bede school. The development site includes the existing car park, so we suggest:</p> <p>"(x) The proposals must deliver improved, safer active travel links through and around the site, specifically between Hyde Abbey Garden, North Walls Recreation Ground, the path alongside the stream to Nuns Road, the path to Park Avenue, Gordon Road and St Bede school. These routes must be established in preference to any new buildings, new car parking or retention of existing car parking in the area."</p>	<p>Points noted. These are all matters that can be considered and assessed through the masterplanning process. <b>Recommended Response:</b> No change.</p>

ANON-KSAR-N88M-V	<p>The Former River Park Leisure Centre site was bequeathed under covenant to the people of Winchester for recreation NOT for a University (learning and non residential institutions) linked development. The site is also in the key location concerning flood risk in Winchester and with a significant footprint and impermeable surfaces these combine to exacerbate flood risk. This whole site should therefore continue to provide recreational space through the provision of formal space such as a further 3G pitch or turned back into informal recreation green space.</p>	<p>Points noted. However, there are currently discussions underway with Southampton University. <b>Recommended Response:</b> No change.</p>
ANON-KSAR-NK6N-E	<p>We remain baffled by this proposal, which seems to have nothing to do with spatial planning, but everything to do with an ill-thought-through Council deal. There is no sense in which this land dedicated to the recreational use of the Winchester public can serve the people of Winchester in any useful way. No obvious amendment except that the Council should withdraw this proposal and think about something more suitable and beneficial to Winchester public.</p>	<p>Points noted. However, there are currently discussion underway with Southampton University. <b>Recommended Response:</b> No change.</p>
ANON-KSAR-N8V5-2	<p>This site belongs to the local people and should not be used for any purpose other than the recreation of local people. In the policies there need to be protections for the benefit of local people There needs to be a policy preventing any development whatsoever on any of the surrounding land unless it is only for recreation by local people</p>	<p>Points noted. However, there are currently discussions underway with Southampton University. <b>Recommended Response:</b> No change.</p>
BHLF-KSAR-N8BD-W	<p>Objections and comments This allocation covers the site of the closed Leisure Centre, the Indoor Bowls Club and outdoor skate park. A masterplan is proposed to be carried out in consultation with key stakeholders and interested parties. The key stakeholders are not explicitly identified. The Trust understands that the land ownership was transferred to the Council to be held in trust for the benefit of the public and a covenant is attached that requires the land to be used for recreational use. It is stated that the skate park should be</p>	<p>Points noted. However, there are currently discussions underway with Southampton University. When work progresses to the masterplan stage this will be time when stakeholders will be identified and engaged in the process. <b>Recommended Response:</b> No change.</p>

	<p>retained and that residential use cannot be considered because the land is within a floodplain.</p> <p>It is implied that the University of Southampton has an interest in an unspecified proposed building. No reference is made to the land acquired by the University on the site of the former police station in North Walls. This site should be included as part of this site allocation. The implied proposal for some form of cultural building needs to be considered in relation to uses proposed for the Central Winchester Regeneration Area, that includes a cultural content.</p> <p>The Indoor Bowls Club could be relocated, as we propose, to the Bar End Depot site. As it stands the site allocation is based on circumspect information. Clarity is required on how this site can enhance North Walls Park as a recreation area, how it relates to the existing University holdings in Park Avenue and North Walls and how its use fits with the regeneration of the Central Area and the emerging walking and cycling strategy.</p>	
<p>BHLF-KSAR-N8BE-X</p> <p>Environment Agency</p>	<p>See SP for colours</p> <p>Comments  Green text: No specific comments/generic comments apply - We welcome the recommendation to ensure development is located outside of FZ 2&amp;3  Orange text: Action to be taken  Red text: Concern over deliverability without further work/information</p>	<p>Points noted.</p> <p>Further work has been undertaken with the support of the EA and HCC as the Lead Flood Authority on preparing a Stage 2 SFRA and site sequential and exception test – these reports are available on the LP website. Work has been undertaken with the support of EA to make changes to Policy W3 to address</p>

	<p>Former River Park Leisure Centre site (New Site) Based on the information currently available, the site raises some environmental concerns that need to be addressed. Further work will be needed to show how these issues can be satisfactorily addressed to ensure no environmental impacts.</p> <ul style="list-style-type: none"> <li>• FZ 2 &amp; 3</li> <li>• Principal Aquifer</li> </ul> <p><b>Flood Risk</b> Notwithstanding our concerns regarding the sequential test, and for the policy to be sound we would advise that a level 2 SFRA is undertaken to provide a greater degree of certainty as to the level of flood risk, both now and with climate change. The LPA have not demonstrated that this site allocation provides wider sustainability benefits to the community that outweigh flood risk.</p> <p>There is evidence of historical flooding here in the winter of 2000/2001 which will need to be taken into account. We welcome that due to flood risk the redevelopment of this site will not include any student halls of residents. We would like to see the requirement included for a site-specific Flood Risk Assessment which demonstrates that the development will be safe for its lifetime taking account of the vulnerability of its uses, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. This should include the measures identified in the Level 2 SFRA (2020) and a SuDS scheme to provide mitigation and opportunities to achieve a reduction in overall flood risk.</p> <p><b>Water Quality</b> The protection of the groundwater will need to be considered as</p>	<p>the EA representation. <b>Recommended Response:</b> Please see wording changes to the Policy.</p> <p><b>Recommended Response:</b> Add additional text at the start of paragraph 12.95 <b>As the site is located on a principal aquifer, any proposed development will need to avoid any contamination to this aquifer.</b></p>
--	---	---



	part of this site - specific policy. The site is not in any SPZ but on principal aquifer, so would be regarded as sensitive.	
<u>ANON-KSAR-N83P-T</u>	I do not agree to the sale of the River Park site to Southampton University / Art College- this area should be retained for public use. There are historic reasons for this also.	Points noted. However, there are currently discussions underway with Southampton University. <b>Recommended Response:</b> No change.

<b>Respondent number</b>	<b>Comment</b>	<b>Officer comment</b>
BHLF-KSAR-N86C-G	<p><b>Active Ground Floor</b> – The University support the principle of active ground floors but note that the implementation of this will be dependent on the type and function of future occupiers.</p> <p><b>Specific Uses to Upper Storeys</b> – The University request that the reference to specific uses to upper storeys be removed to preserve flexibility as this is premature as the requirements of future occupiers are unknown.</p> <p>32. Policy W10 concerns the Former River Park Leisure Centre Site. In this section the University provide their view on the elements of Policy W10 that are relevant to them and provide suggested amendments to the proposed Policy wording.</p> <p>33. The University make the following comments on the current proposed wording of Policy W10:</p> <p><b>Planning Use Class</b> – the allocation allows for F1 (education) and performance space only. The University feel that the Policy does not allow sufficient flexibility to provide for alternative community uses or potential for incubator/office space depending on what a future developer/occupier may wish to use the space for. The University would support the widening of permissible use classes on the site, to ensure appropriate facilities are available for academic and other uses. This provides the greatest flexibility over the Plans duration and supports the National Planning Policy Framework’s (2021) presumption in favour of sustainable development, ensuring that development is built in the right locations.</p>	<p>Points noted.</p> <p>Points noted. The policy wording and the Use Class has been carefully considered. There are other sites in the Local Plan such as Bushfield Camp that are suitable for office space. <b>Recommended response:</b> No Change.</p>

	<p><b>Specific Uses to Upper Storeys</b> – The University request that the reference to specific uses to upper storeys be removed to preserve flexibility as this is premature as the requirements of future occupiers are unknown.</p> <p><b>Active Ground Floor</b> – The University support the principle of active ground floors but note that the implementation of this will be dependent on the type and function of future occupiers.</p> <p><b>Car Parking</b> – Supporting text for Policy W10 at Paragraph 12.96 states that “<i>Car parking will be retained on the northern part of the site in order to support the uses and sporting activities on the North Walls Recreational Area.</i>” As currently written, this is considered too prescriptive and premature given the future occupier is unknown, the University consider decisions around parking should be taken on a site/scheme basis providing sufficient flexibility.</p> <p><b>Accommodation</b> – The policy specifically excludes residential accommodation, which is understandable given the flood risk context for the site. However, the phrasing of the Policy links an increase in academic floorspace to a potential increase in accommodation and recommends a ‘strategy, implementation and active travel plan’. The University consider the phrasing of the ‘strategy’ to be vague and not supported in evidence. The University note at present the published evidence base does not include information around the quantum of existing and proposed student accommodation across the plan period and consequently the collation of this information is seen by the University as a priority. The University note that the interim Position Statement of Student Accommodation in Winchester to inform Local Plan 2036 is out of date, referring to Policy documents which have been superseded.</p> <p><b>Active Ground Floor</b> – The University support the principle of active ground floors but note that the implementation of this will be dependent on the type and function of future occupiers.</p> <p><b>Specific Uses to Upper Storeys</b> – The University request that the reference to specific uses to upper storeys be removed to preserve flexibility as this is premature as the requirements of future occupiers are unknown.</p> <p><b>Planning Use Class</b> – . The University feel that the Policy does not allow sufficient flexibility to provide for alternative community uses or potential for incubator/office space depending on what a future developer/occupier may wish to use the space for. The University would support the widening of permissible use classes on the site, to ensure appropriate facilities are available for academic and other uses. This provides the greatest flexibility over the Plans duration and supports the National Planning Policy Framework’s (2021) presumption in favour of sustainable development, ensuring that development is built in the right locations.</p>	<p>Points noted.</p> <p><b>Recommended Response:</b> Amend Policy W10 to include ‘<b>Class E (d) indoor sport and recreation</b>’. The policy has been updated to include a list of the uses that are acceptable in Class F1.</p> <p>Disagree, point regarding the car parking provision as this area of land is not within the site allocation.</p> <p>Use Class F1 allows the uses referred to in this representation.</p> <p>Disagree with proposed changes in connection with criteria v of Policy W10 as the sites unique location offers an opportunity for this to be explored through the masterplanning process. Criteria vi is not saying that the whole of the ground</p>
--	---	--

	<p>Paragraph 7 of the Interim position statement concerns next steps. An extract of the text is provided at Figure 1.</p> <p>It is the understanding of the University that these next steps have not been undertaken by Winchester City Council. The University encourage the consideration and development of all the following recommendations in order to present an accurate and up to date evidence base which can guide the approach to student accommodation across the city.</p> <p>As such the University request its removal until further clarification can be provided as to exactly what would be required in a 'strategy'. Please note that the University oppose any direct linkage between academic floorspace and an increase in student bedspaces. It is evident from emerging trends and research that the way in which academic floorspace is utilised by universities is continually evolving. With more space intensive research areas, computer labs and other such study areas taking up more space than space efficient large lecture theatres, which are not suitable for all learning types or flexible spaces for future ways of working/learning. The University strongly recommend the removal of any connective wording between academic floorspace and student accommodation, in favour of a University by University and Project by Project approach, whereby an established evidence baseline can demonstrate whether the floorspace proposed is for accommodating existing or additional student numbers and that the University are able to provide accommodation as appropriate and required to do so.</p> <p><b>Figure 1- Extract from Regulation 18 Local Plan Consultation</b></p> <p><b>7.Next steps</b></p> <p>7.1To inform Local Plan 2036 it will be necessary to undertake the</p>	<p>floor needs to have active frontages.</p>
--	--	--

following assessments as evidence to support any planning policy response:

- Full audit of existing student accommodation provision in the city
- Understanding the changing nature of student accommodation - demand for bigger rooms/ensuite provision etc
- Commission a Strategic Housing Market Assessment - to include provision vs projected growth rates of students/young working people - potential HMO occupants
- Understanding plans **for** growth from all higher education providers in the district over next 15 - 20 years
  - Numbers of students - existing and planned
  - University plans **for** refurbishment/expansion of existing provision
  - Private sector (non university) provision

7.1 The above promotes a holistic approach to consider and respond to the student accommodation needs for Winchester City, taking into account the students from all Universities and Colleges, the current student housing figures, the forecast numbers and the student accommodation provision. This approach needs to be thorough to ensure that the Local Plan is based on robust evidence, to meet the current need as well as for the future.

### Proposed Changes to Draft Policy Wording

34. The University propose the following amendments to draft Policy W10 (deletions in ~~strikethrough~~, additions in red).

*"Development proposals for the former River Park Leisure centre site as shown on the Policies Map, will be granted planning permission for development of F.1 use (Learning and non residential institutions), Performance Space **academic buildings and spaces which accommodate learning, teaching, research, training, sport and fitness (indoor and outdoor) and student support related uses and other facilities compatible with and linked to wider academic uses including office spaces for facilitating relationships with businesses and providing incubator space**, provided that detailed proposals accord with the Development Plan and demonstrates how proposals will accord with the following:*

- i. Any application for development is preceded by, and is consistent with, a site wide masterplan for the whole site which has involved and engaged with stakeholders and interested parties before it is agreed by the council.*
- ii. The proposals relate to the whole of the allocated development or if less do not in any way prejudice the implementation of master planning of the whole site;*
- iii. The proposals for the design must ensure strong connectivity with the surrounding landscape and townscape - visually, physically and ecologically;*

- iv. *The proposal include a Strategic Flood Risk Assessment which incorporates and includes innovative, multi- functional mitigation measures to address the risk of flooding;*
- v. *The proposals must have particular regard to relationship with the South Downs National Park, the Winchester Conservation Area, the River Itchen and views from and to Winchester Cathedral in terms of the height, view corridors and the appearance of the building, design of the roof **and lighting.** and any use and activity on the upper floor of the building;*
- vi. *The proposals need to create activity on the ground floor that take full advantage of the riverside setting in a way that creates a visually interesting design that complements the setting of the river, **acceptable activity could include Class E uses, lobbies, co-working or workshop/teaching space.***
- vii. *The proposals are designed to complement and enhance the appearance of the North Walls Recreation Ground and provides a suitable and attractive gateway into the city;*
- viii. *The proposals are designed to be permeable, maximise public accessibility that includes publicly accessible performance/events space that benefits the city and is linked to the nearby Primary School, the outdoor skate park, the indoor bowling facilit:', and links to the nearby educational institutions; and the proposals are designed to accommodate an accessible and connected public realm.*
- ix. *The proposals do not include residential development but where a proposal could lead to additional accommodation requirements, they come forward with a strategy, implementation and an active travel plan."*

### **Test of 'Soundness'**

**34.** Paragraph 35 of the NPPF outlines the test of 'soundness' for Local Plans. As written Policy W10 does not include reasonable alternatives for the site, the potential use classes, uses on specific floors and location of parking are too prescriptive. The University have suggested wording that they consider allows for reasonable alternatives which will be based on future design stages, which would be considered proportionate evidence. Additionally, the evidence base which informs the Policy has not been updated, as such the University do not consider the Policy to be 'justified'.

**35.** The Policy seeks to support environmental sustainability and would allow for positive economic impacts for Winchester, the University consider the policy is written in the spirit of positive preparedness.

**36.** The Policy encourages the use of a brownfield site which is in accordance with the NPPF's principles around making effective use of land.

**37.** In light of the above the University do not consider the Policy, in its current form to be considered 'sound' in Policy terms. The University would strongly encourage the inclusion of the additional proposed text and recommend that the evidence base which supports the policy is updated accordingly.

### **Paragraph 9.64**

**38.** Paragraph 9.64 of the Local Plan states the following:

	<p><i>"Southampton University also plans to expand Winchester School of Art on the former River Park Leisure Centre site, primarily for additional academic space. The University's campus and land at the former River Park Leisure Centre is also identified as a location for change and growth (see Policy W10). This will also need a masterplan to show how it can be developed in accordance with the requirements of Policy H9 and achieve an increase in student housing accommodation to support it and prevent students from commuting into the town. It is estimated that an additional approximately 350-400 student bedspaces (about 100 dwelling equivalents) will be provided nearby but not on the site covered by policy W10."</i></p> <p><b>39.</b> The University of Southampton request that Paragraph 9.64 be removed from the draft Local Plan to ensure that expectations are not falsely raised as to the Universities intentions in regard to the site. As written, it is premature and an inaccurate representation of the University's current position in relation to its developing intentions for the Winchester School of Art.</p> <p><b>40.</b> The University note that Policy W10 excludes student accommodation from being located within the River Park Leisure Centre Site, yet River Park is referenced in Paragraph 9.64 as an area that will see an increase in student bedspaces. The University recommend a review of all references to River Park and student accommodation throughout the Local Plan consultation document to ensure consistency in the overall policy approach to the site and those uses which would be seen as acceptable on site.</p>	
--	--	--

	<b>Recommendations</b>	<b>Officer response</b>
--	------------------------	-------------------------



Comments from SA	No comments	
Comments from HRA	No comments	

Amendments to supporting text:

12.85 The site is located within River Park formerly the North Walls Recreation Ground. The majority of the site is occupied by the former River Park Leisure centre complex which was decommissioned upon the opening of the new Winchester Sport and Leisure Park in 2021. It also includes the popular and well used outdoor skate park and the indoor bowling facility.

12.86 The site is defined in a broad way, to enable a comprehensive approach to be taken regarding the future development of the land, which will be subject to a master planning process. This does not mean therefore that all of the site included in the plan is proposed or suitable for built development.

12.87 The site is adjacent to the South Downs National Park (SDNP). There are views into, and out of the site, to the Park and views of Winchester Cathedral which will be key matters to consider when bringing forward any plans for the redevelopment of the site. The site is currently located outside of the settlement boundary. This site has also been identified in the Local Plan as an 'Area of Opportunity' outlined in the topic of 'High Quality, Well Designed Places and Living Well.

12.88 The skate park abuts the River Itchen and there is a small tributary of the river that runs along one the boundary of the existing Leisure centre complex. Due to the proximity of the site to the River Itchen, it is located within a flood risk area and the groundwater levels are less than a metre below the surface which are important considerations that would need to be taken into account as part of the redevelopment of the site.

12.89 Hyde Abbey Gardens which includes the remains of Hyde Abbey, a Benedictine monastery, extends into the car park and grounds of the adjacent former Leisure centre complex. Hyde Gateway, which is located opposite St Bartholomew's Church in King Alfred's Place, and the Bridge ~~is which are~~ **a Scheduled Monuments, and Listed Building. The Bridge is also a Listed Building and a Scheduled Monument. These** are the only substantial remains **that exist**. As the western boundary of the site is also located adjacent to the Winchester Conservation Area boundary, any development will need to take this into consideration as part of the design process. **As the western boundary of the site is also located adjacent to the Winchester Conservation Area boundary, any development will need to take this into consideration Abbey remains above and below ground, both scheduled and unscheduled but potentially of national importance, and impacts on their significance as part of the design process.**

## 12.90 Master planning of the site

Given the prominent and unique location of the site, any redevelopment proposals would need to be preceded by a masterplan that is prepared in consultation with key stakeholders and interested parties and is agreed by the city council.

12.91 There is an opportunity as part the redevelopment of this site to enhance the city's cultural offer in an area of considerable historic importance. The proposed development needs to include a publicly accessible performance/events space within the development in order to meet local demands around promoting vibrancy in this area and economic benefits from the visitor economy. and to create a permeable development. The opportunity needs to be explored through the master planning process to use public realm and the design and layout of the buildings to connect, through learning and development, the site with the Primary School which is adjacent to the site, the outdoor skate park, the indoor bowling facility and links to the nearby educational institutions.

~~12.92 It is expected that there will be a substantial increase in student numbers as a result of this development, and this should be supported by additional student housing provision. Due to flood risk this will need to be provided off-site, in a location well related to the University, and is estimated to amount to about 350-400 student bedrooms (about 100 dwelling equivalents).~~ The appearance of the buildings and use of materials, the overall scale, mass height of the development including its roof, impact on view corridors and the design of the lighting will also require careful consideration in order to successfully create an high quality development which creates sense of place and forms a fitting gateway to the city centre that compliments the wider rural setting of the site, South Downs National Park (SDNP) and so reflects local distinctiveness. Any development also needs to protect, support and enhance the protected green space to the north and east of the site.

12.93 Whilst careful consideration would need to be taken regarding the setting and the impact of the proposed building and lighting on the SDNP, Winchester Cathedral, the adjacent conservation area and the nearby residential properties, the master planning process should explore the potential uses and activities that could take place on the upper storey of the building. Given the unique position of the site, the use of the upper storey of the building could be used to capitalise and provide unique viewpoints of the city centre and the surrounding countryside.

12.94 The outdoor skate park which is adjacent to the site will continue to be managed and maintained by the council and will be safeguarded as a key local recreational facility. Whilst the skate park should be retained on the site, opportunities could be explored through the master planning process as to how this existing facility could be potentially enhanced and/or improved.

12.95 **As the site is located on a principal aquifer, any proposed development will need to avoid any contamination to this aquifer. Due to the close proximity to Winnall Moors nature reserve and River Itchen SSSI and SAC, any development will require assessment and be carefully designed to avoid impacts from poor quality surface water run-off by the incorporation of naturalised SuDS features, multifunctional green space that is designed and managed with biodiversity benefits. The site has been identified in Policy W10 as being suitable for a range of uses that are compatible with the flood risk, the nearby Winnall Nature Reserve and the North Walls Recreation Ground.** ~~Due flood risk the redevelopment of the site will not include any student halls of residents and it will be important that any scheme for the redevelopment of this site is accompanied by a strategy, implementation and active travel plan to address the demand for additional student housing in the city that is generated from this proposal.~~

12.96 Car parking will be retained on the northern part of the site in order to support the uses and sporting activities on the North Walls Recreational Area.

12.97 In order to make the best use of this empty building, subject to obtaining the necessary planning approvals, ‘meanwhile’ uses, which involve the temporary use of either the whole or part of the existing building will be supported on this site providing that they are compatible with the sites location in the countryside, the proposals indicate how long the use with occupy the building and they comply with other aspects of the Local Plan. Any meanwhile uses that involve external works will need to be carefully assessed.

#### Amendments to policy W10

Development proposals for the former River Park Leisure centre site as shown on the Policies Map, will be granted planning permission for development of F1 uses (Learning and non-residential institutions – **Any use not including residential use - a) for the provision of education b) for the display of artwork (not for sale or hire), c) as a museum, d) as a public library or public reading room e) as a public hall or exhibition hall f) for, or in connection with, public worship or religious instruction, g) as a law court), Class E (d) indoor sport and recreation**), provided that detailed proposals accord with the Development Plan and demonstrates how proposals will accord with the following:

- i. Any application for development is preceded by, and is consistent with, a site wide masterplan for the whole site which has involved and engaged with stakeholders and interested parties before it is agreed by the council;
- ii. The proposals relate to the whole of the allocated development or if less **does** not in any way prejudice the implementation of master planning of the whole site;

**Add an additional criteria:**

**How the site might be capable of accommodating a compatible/flexible range of uses on different floors;**

iii. The proposals for the design must ensure strong connectivity with the surrounding landscape and townscape - visually, physically and ecologically; **and are informed by and are sensitive to the heritage significance of the site, including the Abbey remains;**

~~iv. The proposal include a Strategic Flood Risk Assessment which incorporates and includes innovative, multi-functional mitigation measures to address the risk of flooding~~

**New criteria:**

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

**Add new criteria:**

**The proposals will need to include mitigation measures that avoid surface water run-off to the Winnall Moors nature reserve and River Itchen SSSI and SAC through the incorporation of naturalised SuDS features, multifunctional green space that is designed and managed with biodiversity benefits;**

v. The proposals must have particular regard to **the** relationship with the South Downs National Park, the Winchester Conservation Area, the River Itchen and views from and to Winchester Cathedral in terms of the height, view corridors and the appearance of the building, design of the **roof (including materials and detailing)**, lighting and any use and activity on the upper floor of the building, **while ensuring that the building's massing responds positively to the Winchester Conservation Area;**

vi. The proposals need to create activity on the ground floor that take full advantage of the riverside setting in a way that creates a visually interesting design that complements the setting of the river;

vii. The proposals are designed to complement and enhance the appearance of the ~~North Walls~~ River Park Recreation Ground and provides a suitable and attractive gateway into the city;

viii. The proposals are designed to be permeable, ~~maximise public accessibility~~ that includes publicly accessible performance/events space that benefits the City; ~~and is linked to the nearby Primary School, the outdoor skate park, the indoor bowling facility and links to the nearby educational institutions;~~ and

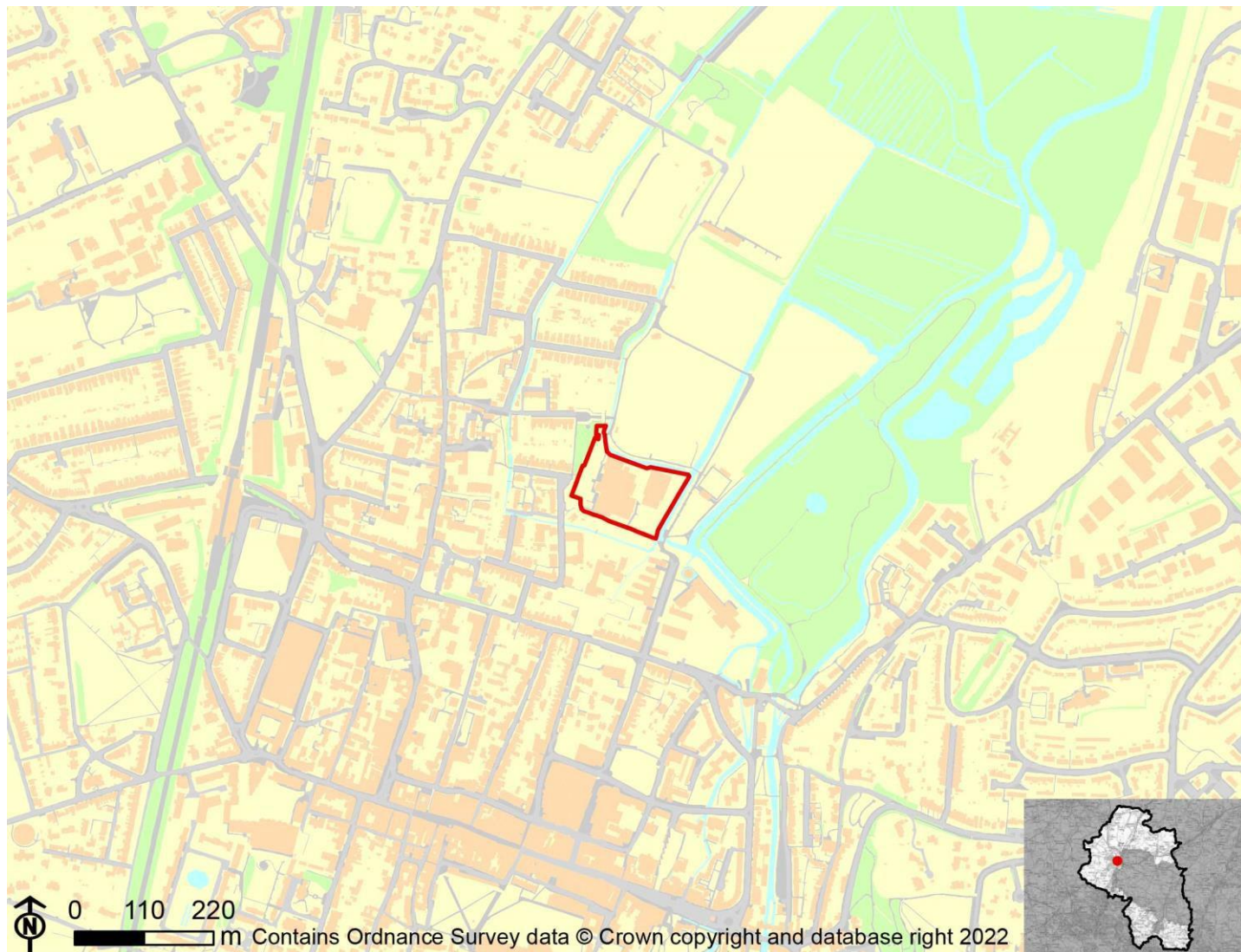
**Add an additional criteria:**

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

~~ix. The proposals do not include residential development but where a proposal could lead to additional accommodation requirements they come forward with a strategy, implementation and an active travel plan.~~

## WIN23: River Park Leisure Centre

Proposed use: Mixed use



IIA Objective	Score
IIA1: climate change mitigation	Minor positive (+)
IIA2: travel and air quality	Minor positive (+)
IIA4: health and wellbeing	Negligible (0)
IIA7: services and facilities	Minor positive (+)
IIA8: economy	Negligible uncertain (0?)
IIA9: biodiversity and geodiversity	Significant negative (--)
IIA10: landscape	Negligible uncertain (0?)
IIA11: historic environment	Negligible uncertain (0?)
IIA12: natural resources	Minor negative (-)
IIA13: water resources	Negligible (0)
IIA14: flood risk	Significant negative (--)

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

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

Score by criteria: 1a: Minor positive (+); 1b: Major positive (++); 1c: Minor positive (+); 1d: Major positive (++); 1e: Minor positive (+); 1f: Minor positive (+); 1g: Major positive (++); 1h: Negligible (0); 1i: Major negative (--)

Justification: The site is within 401-800m of an NHS GP surgery. It is within 400m of a primary school. It is within 501-1,000m of a secondary school. It is within 400m of a town centre. It is within 201-400m of a district or local centre. It is within 501-1,000m of a railway station. It is within 300m of a bus stop. It is within 300m of open space, open country or registered common land. More than 25% of the site contains open space, open country or registered common land, which could be lost to development. The majority of it is within an area where average commuting distance is in 81-100% range for the plan area.

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

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

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

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

**Overall effect: Negligible (0)**

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

Justification: The site is within 500m of an AQMA. The majority of it is within an area where noise levels at night from roads and railways are below 50 dB and the noise levels as recorded for the 16-hour period between 0700 – 2300 are below 55 dB. The site does not lie within a noise contour associated with Southampton Airport. It is within 400m of a wastewater treatment works or within 250m of a waste management facility. The site is within 401-800m of an NHS GP surgery. It is within 300m of open space, open country or registered common land. More than 25% of the site contains open space, open country or registered common land, which could be lost to development. It is within 200m of a public right of way or cycle path.

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

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

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

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

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

Justification: The site is not in existing employment use.

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

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

Score by criteria: 9a: Minor negative (-); 9b: Negligible (0); 9c: Minor negative (-); 9d: Minor negative (-); 9e: Negligible (0)

Justification: The site is within a SSSI Impact Risk Zone for 'residential' or 'all planning applications'. It is not within 500m of a locally designated wildlife site or ancient woodland. It is within 200m of a priority habitat. It is within 100m of a water course. The site does not intersect with a county or local geological site.

IIA objective 10: To conserve and enhance the character and distinctiveness of the

District's landscapes.

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

Justification: The site has low overall landscape sensitivity.

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

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

Justification: The site is rated 'green' for risk of effects relating to historical constraints.

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

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

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

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

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

**Overall effect: Negligible (0)**

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

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

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

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

Justification: A significant proportion of site ( $\geq 25\%$ ) is within flood zone 3. Less than 25% of the site has a 1 in 100 year or 1 in 30 year risk of surface water flooding.