

Policy SH1: West of Waterlooville, including Newlands

Overview of Comments:

Support - 1

Neither support or object - 4

Object - 5

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.

Comments which neither support nor object to SH1 - West of Waterlooville, including Newlands		
Respondent number	Comment	Officer comment
BHLF-KSAR-N86T-1 Hampshire County Council (Transport)	<p>Welcome intensification of dwellings where this is within 800 metres walking distance to Waterlooville town centre or 400 metres walking distance to the STAR bus stops on London Road corridor. The transport implications associated must be assessed in a revised Transport Assessment. Impacts on neighbouring authorities will require discussions and where appropriate additional mitigation measures.</p> <p>Request the following additions: SH1 i add at end: <i>'...The development proposals will need to align with and support the delivery of the Havant LCWIP network including the Waterlooville Core Walking Zone. The development should have consideration for the emerging Winchester District LCWIP network proposals, and wherever possible futureproof the development to support the delivery of a countywide LCWIP network that traverses</i></p>	<p>Support welcomed and comments noted.</p> <p>Some intensification can be carried out within the terms of the existing consent for West of Waterlooville, so only a modest amount of development may require additional consents and contribute to transport improvements. The site developer is in the process of producing updated transport assessments.</p> <p>The additional text suggested is too detailed for inclusion in policy SH1 itself, but it is recommended that similar</p>

	<p><i>the boundaries of both Havant and Winchester.’</i></p> <p>SH1 iv add at end: ‘...<i>The development will need to consider and support the delivery of the South East Hampshire Rapid Transit (SEHRT) proposals including the Ladybridge Road/London Road roundabout and facilitates infrastructure improvements that improves passenger experience and journey time reliability along the A3 London Road Corridor.’</i></p>	<p>wording be added to the explanatory text accompanying the policy.</p> <p>Recommended response: Add new paragraph after 13.12, as follows: <u>13.13 The development proposals will need to align with and support the delivery of the Havant Local Cycling and Walking Infrastructure Plan (LCWIP) network, the emerging Winchester District LCWIP and a countywide LCWIP network that traverses the boundaries of both Havant and Winchester. The development will also need to consider and support the delivery of the South East Hampshire Rapid Transit (SEHRT) proposals including the Ladybridge Road / London Road roundabout and improvements to the passenger experience and journey time reliability along the A3 London Road Corridor.</u></p>
BHLF-KSAR-N86Z-7	<p>The GP surgeries that serve these potential sites are currently over-subscribed by 17,770 and the additional dwellings from the local plan will add a further 3,979 patients. The NHS will be seeking financial contributions to increase the primary care space by a further 318 sq m.</p> <p>Due to the additional healthcare activities that will derive from the Local Plan there should be references in policy SH1 to the requirement for impacts to be mitigated.</p>	<p>comments noted. Officers have held a number of meetings with the ICB to understand further this representation and others on proposed site allocations in the regulation 18 draft Local Plan. Further information has been sought from the ICB to provide more detail on the nature and scope of any deficit in GP surgery facilities and how it may be resolved. This includes confirmation of which surgeries serve proposed allocations and which may require</p>

		<p>improvement. At this point it is considered prudent for the Plan and associated Infrastructure Delivery Plan to note this position and set out a mechanism to deal with any necessary infrastructure requirements arising from this request. The Infrastructure Delivery Plan will include the most recent information received from the ICB regarding the capacity of infrastructure and identified need for any improvements.</p> <p>Recommended response: No change.</p>
BHLF-KSAR-N8ZG-R	<p>Concerns about the impact on habitats used by Brent geese, it is probable that this area provides a fallback feeding site, supporting the SPA's populations. These sites can become important habitats in certain conditions and will become increasingly important as we lose coastal habitats to development, flooding and sea level rise.</p> <p>More survey work should be done over the next few winters to define whether the site is being used by waders and wildfowl and consider whether the current land use is suitable for overwintering wildfowl and waders.</p>	<p>Comments noted. Policy SH1 Does not expand the area allocated for development at West of Waterlooville, it simply intensifies the level of proposed development in certain parts. The Solent Waders & Brent Goose Strategy does not identify any land at West of Waterlooville as being used by Brent geese but the studies being undertaken by the site developers will identify any such use.</p> <p>Recommended response: No change</p>

Comments which object to SH1 - West of Waterloo, including Newlands

Respondent number	Comment	Officer comment
<p>BHLF-KSAR-N8BE-X Environment Agency Link here</p>	<p>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 can be satisfactorily addressed.</p> <ul style="list-style-type: none"> • FZ3 • SPZ • main River Wallington • mains drainage only on East of site. <p>Flood Risk. For the policy to be sound a level 2 SFRA should be undertaken to provide a greater degree of certainty, both now and with climate change. It has not been demonstrated that this site allocation provides wider sustainability benefits to the community that would outweigh flood risk.</p> <p>There should be a requirement included for a site-specific Flood Risk Assessment which demonstrates that the development will be safe for its lifetime, 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 reduce overall flood risk.</p> <p>Policy SP2 does not refer to:</p> <ul style="list-style-type: none"> • The need for a site-specific FRA; • The site needs to be safe over the lifetime of the development; 	<p>Comments noted. It is proposed that new criteria relating to flooding and water quality be added to policy SH1, which cover the matters raised by the respondent.</p> <p>Recommended response: Amend Policy SH1 to add new criteria(vi.-viii.) as follows:</p> <p>vi. <u><i>A site specific Flood Risk Assessment will need to be prepared and agreed that demonstrates how the development will be safe over 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;</i></u></p> <p>vii. <u><i>Ensure that the groundwater Source Protection Zone is protected and that development will be safe over its lifetime by undertaking a site-specific flood risk assessment and implementing any necessary measures; and</i></u></p>

	<ul style="list-style-type: none"> • If the site is susceptible to surface water flooding, opportunities for NFM or more green infrastructure need to be explored. <p>Water Quality. The protection of groundwater will need to be considered as part of this policy.</p>	<p>viii. <u>Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider.</u></p>
<p>ANON-KSAR-NK2C-Y Southern Water Link here</p>	<p>Southern Water has undertaken an assessment of the existing capacity of infrastructure and its ability to meet the forecast demand. The local sewerage infrastructure in closest proximity to the site has limited capacity to accommodate the proposed development. This is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation is phased to align with the delivery of wastewater infrastructure.</p> <p>Proposals for up to 3,000 dwellings will generate a need for reinforcement of the wastewater network, which will be provided through the New Infrastructure charge. Southern Water will need to work with site promoters to understand the development program and whether the delivery of network reinforcement aligns with the occupation of the development. Connection at this site ahead of new infrastructure delivery could lead to an increased risk of flooding unless the works are implemented in advance of occupation.</p> <p>Southern Water has limited powers to prevent connections, even when capacity is limited. Planning policies and planning conditions, therefore, are important in ensuring that development is coordinated with the necessary infrastructure and does not contribute to pollution.</p>	<p>Comments noted. It is proposed above that new criteria relating to flooding and water quality be added to policy SH1, which include the wording recommended by the respondent.</p> <p>Recommended response: Amend Policy SH1 to add new criteria(vi.-viii.) as follows:</p> <p>ix. <u>A site specific Flood Risk Assessment will need to be prepared and agreed that demonstrates how the development will be safe over 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;</u></p> <p>x. <u>Ensure that the groundwater Source Protection Zone is protected and that development will be safe over its lifetime by undertaking a site-specific flood risk</u></p>

	<p>Propose the following addition to policy SH1: ‘<i>Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider.</i>’</p>	<p><i>assessment and implementing any necessary measures; and</i> xi. <u><i>Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider.</i></u></p>
<p>ANON-KSAR-N8XU-4</p>	<p>Support the policy in principle. The West of Waterlooville MDA provides an opportunity for an uplift of units within the boundary of the extant planning consent.</p> <p>Support WCC's vision for the South Hampshire Urban Area, which complements the PfSH strategy by providing large-scale high-quality housing, economic development opportunities, and relevant associated uses. Welcome the focus on the delivery of large-scale strategic development areas in sustainable locations. The recognition that the West of Waterlooville MDA (Berewood) is able to contribute by way of intensifying and expanding the existing development is supported.</p> <p>Support additional units within the West Waterlooville MDA, 250 is a minimum number of additional units that can be achieved within the allocated area.</p> <p>Grainger Plc refers to their land ownership as 'Berewood' whilst the parish council is referred to as 'Newlands Parish Council'. The reference to 'West of Waterlooville, including Newlands' is taken to assume that the policy allows for an addition of 250 units within the Grainger Plc controlled part of the MDA, but clarification on this point is sought. Should</p>	<p>The supportive comments of the site developer are noted and welcomed. Officers are working with Grainger to refine the estimate of additional capacity and the respondents have completed a Site Delivery Statement confirming that the allocation is available and viable, and supporting the proposed intensification. Capacity testing work has been undertaken, including reviews of transport infrastructure, water supply and wastewater, green infrastructure, education requirements, community and sports facilities and utilities provision.</p> <p>It is confirmed that the additional units are proposed within the Grainger land ownership, as all residential development elsewhere at West of Waterlooville is now completed. The references to the different parts of the development can be confusing when policy SH1 relates to the whole West of Waterlooville development (within Winchester District). Accordingly,</p>

	<p>this reference include the wider MDA site allocation, the Local Plan should be amended to make clear that the additional units will be within Grainger's land holding.</p> <p>Grainger Plc fully supports the continued allocation of West of Waterlooville MDA.</p> <p>Since initial discussions regarding the quantum of additional capacity likely to be achieved, it may be possible to achieve a higher quantum of units. Therefore the wording of SH1 should be amended to refer to 'a minimum of 250 dwellings' to be achieved through intensification or rearrangement of uses within the Winchester District part of the development.</p> <p>The delivery of committed strategic development sites in the South Hampshire Urban Area has been approved under previous planning policy and allowance should be made within forthcoming policies to ensure the deliverability of extant planning consents is not compromised in terms of development quantum and viability.</p> <p>The MDA makes a significant contribution to housing delivery and will continue to do so with three further land sales planned within the next 12 months. The ability to deliver additional units will ensure a continued provision of housing supply within the South Hampshire Urban Area.</p>	<p>it is recommended that the policy and explanatory text refers to 'Newlands (West of Waterlooville)' unless it is specifically referring to a particular sub-area.</p> <p>Work is currently ongoing to refine the capacity that can be achieved, and the policy wording may need to be updated as a result. An up to date estimate of capacity should be used in the policy, rather than the suggested reference to 'a minimum of 250 dwellings'.</p> <p>Recommended response: Amend Policy SH1 as follows: Newlands (West of Waterlooville), including Newlands Land at Newlands, to the West of Waterlooville, including Newlands (as shown on the map on the previous page) remains allocated to complete the development of a new community of 3,000 dwellings.... This should continue to deliver the agreed vision for Newlands (West of Waterlooville), including Newlands which aims to create a sustainable urban extension to Waterlooville, integrated with the town centre and forming the fourth quadrant of the town.</p>
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		Amend explanatory text at pages 379-385 to refer to ' Newlands (West of Waterlooville) ' and delete including Newlands.
ANON-KSAR-N8Q5-W	<p>The site includes multiple areas of ancient woodland, including Alsfordmoor Coppice, Newlands Row and Marrelsmoor Coppice. Object to ancient woodland areas being included in sites allocated for development.</p> <p>There are other areas of ancient woodland adjacent, including Newlands Moor and Drivetts Coppice. Recommend that as a precautionary principle a minimum 50 metre buffer should be maintained, including through the construction phase, unless the applicant can demonstrate how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.</p>	<p>Policy SH1 carries forward an existing strategic allocation, which is now partly developed. A masterplan has been approved for the area, which ensures that ancient woodland (in the southern part of the allocated area) is protected and that appropriate buffers and new green infrastructure are provided.</p> <p>A Habitats Regulations Assessment will be needed for the additional proposed development, in accordance with other policies of the Plan, which will identify constraints such as ancient woodland and require their protection. The masterplan may need to be updated as a result.</p> <p>Recommended response: No change</p>
ANON-KSAR-NKYX-U	Object because you have not put any extra amenities in place plus the congestion caused by the extra traffic has not been addressed	Comments noted. Additional amenities have been put in place and traffic pressures addressed. There is an existing planning consent, S106 obligation and masterplan in place for the development which will be extended as necessary to ensure that adequate infrastructure is provided.

		Provision has already been made in conjunction with the early phases of development for transport improvements, a new primary school, shops, community facilities, open space, etc. Recommended response: No change
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	Recommendations	Officer response
Comments from SA	None	NA
Comments from HRA	None	NA

Policy SH1 Newlands (West of Waterlooville), including Newlands

Land **at Newlands**, to the West of Waterlooville, ~~including Newlands~~ (as shown on the map **of Newlands (West of Waterlooville) Master Plan Area** ~~on the previous page~~) remains allocated to complete the development of a new community of 3,000 dwellings (about 600 in Havant Borough), of which 40% are expected to be affordable, and associated employment provision, support facilities and services, together with supporting uses. An additional approximately ~~250~~ **300** dwellings ~~(site capacity under review and may increase to about 400)~~ will be achieved through intensification or rearrangement of uses within the Winchester District part of the development. This should continue to deliver the agreed vision for **Newlands (West of Waterlooville), including Newlands** which aims to create a sustainable urban extension to Waterlooville, integrated with the town centre and forming the fourth quadrant of the town.

Development should accord with Policy SP2 and the following site-specific requirements:

- i. Be integrated with Waterlooville town centre including measures to enable good pedestrian and cycle access across Maurepas Way;
- ii. Retail provision within the development should be within a modest local centre which is subservient to Waterlooville town centre;

- iii. Provide about 23 hectares of employment land, including uses which will help link the development to the town centre, create a vibrant commercial area and include some mixed housing/ commercial areas;
- iv. Provide a new access road through the development between the A3/ Ladybridge Road roundabout and the A3/Maurepas Way roundabout with public transport provision and other measures to reduce traffic generation. The development should fund any off-site transport improvements necessary to achieve this and to accommodate traffic likely to be generated by the development;
- v. Provide primary school places and contributions to off-site improvements to secondary education to accommodate the development, along with other physical and social infrastructure;

Add new criteria:

A site specific Flood Risk Assessment will need to be prepared and agreed that demonstrates how the development will be safe over 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.

Ensure that the groundwater Source Protection Zone is protected and that development will be safe over its lifetime by undertaking a site-specific flood risk assessment and implementing any necessary measures. Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider.

Explanatory Text: Amend explanatory text at pages 379-385 to refer to '**Newlands (West of Waterlooville)**' and delete including Newlands.

13.2The existing PfSH Spatial Position Statement (~~2016~~**2023**) has a 'cities / urban areas first' approach, so as to maximise development potential within the cities of Southampton and Portsmouth and other urban areas, and minimise greenfield land take. Greenfield developments are still needed, with strategic development locations identified at **Newlands (West of Waterlooville)**, including ~~Newlands~~, Welborne, North Whiteley and the northern part of Eastleigh Borough.

13.3 The Local Plan's spatial vision for this area reflects the PfSH Spatial Position Statement ~~and ongoing work to develop an updated Joint Strategy~~ by bringing forward large scale developments through new urban extensions, rather than dispersing large volumes of housing amongst the smaller settlements which also lie within the PfSH area....

13.4 In line with the PfSH strategy major greenfield development is focused on the urban areas that fringe the district, at **Newlands (West of Waterlooville)**, including ~~Newlands and North Whiteley~~, where there are large existing and planned employment allocations. A total of about 6,000 dwellings is already planned in these locations (Local Plan Part 1), of which **over 3,700**~~about 4,700~~ remain to be developed (at April ~~2023~~2024).

13.5 The strategy of focussing development on these large-scale sustainable locations is carried forward and the scope to expand or intensify the developments at ~~West of Waterlooville~~, including Newlands (~~‘Berewood’~~) (**West of Waterlooville**) and North Whiteley has been investigated. These developments generally have well-defined boundaries, existing or planned, which should not be breached but some modest scope for additional development has been identified. The emphasis is to provide mixed communities with provision of a range of housing types and tenures, including affordable housing. There may also be scope within ~~Berewood Newlands~~ and North Whiteley to introduce more variety of housing so as to address specific needs, such as older persons’ housing.

Update SHUA Housing Table at page 381

13.7 In terms of existing employment provision, there is substantial employment provision in the business parks at Whiteley and within the thriving town centre. At ~~West of Waterlooville~~, including ~~Newlands~~ (**West of Waterlooville**), land allocated for employment uses is being developed and, along with other business sites and Waterlooville town centre nearby, will provide for ~~West of Waterlooville~~, including ~~Newlands~~’ employment and service needs.

13.8 At **Newlands (West of Waterlooville)**, including ~~Newlands~~ there is scope to achieve additional capacity without extending the proposed development area, through a mixture of revisions to the estimated capacity and use of various phases. These are expected to give an additional capacity of about ~~300~~250 dwellings, beyond the approximately ~~1,200~~1,400 that remained to be developed at ~~2023~~2024 under the original planning consent.

13.9 The existing policy allocating land at ~~West of Waterlooville~~, including Newlands (West of Waterlooville) is carried forward, updated as necessary. It continues to cover the whole area originally allocated as ~~a the West of Waterlooville, including Newlands~~ major development area, although the northern part (Old Park Farm) is now largely developed, as are parts of the southern area (~~Berewood~~). This is to ensure that the **Newlands (West of Waterlooville)**, including ~~Newlands~~ urban extension continues to provide all the infrastructure, facilities and other requirements of the development as a whole.

13.10 Approximately ~~1,200~~1,400 dwellings of the original allocation remain to be developed (at April ~~2023~~2024), out of a total of almost 2,500 within Winchester District. The capacity of the development area has been reviewed and this indicates that additional

capacity can be achieved without extending the proposed development area, through a mixture of revisions to the estimated capacity of various phases (**about 145 dwellings**), development of land reserved but no longer needed for expansion of the primary school **and cemetery (approximately 110 dwellings)**, and **the development of an older persons' housing scheme (approximately 45 dwelling equivalents)** changes within the local centre or other areas. These are expected to give an additional capacity of about **300~~250~~** dwellings.

Add new paragraph after 13.12:

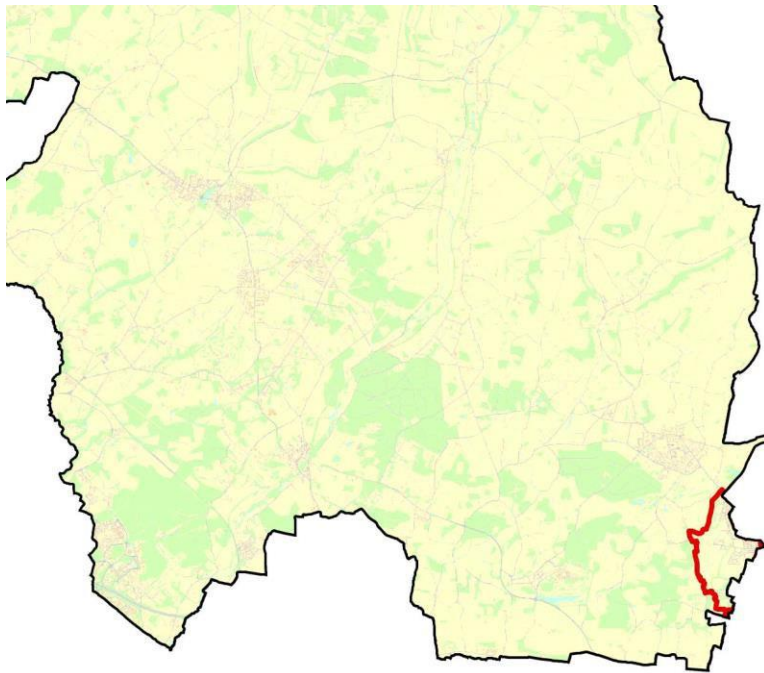
13.13 The development proposals will need to align with and support the delivery of the Havant Local Cycling and Walking Infrastructure Plan (LCWIP) network, the emerging Winchester District LCWIP and a countywide LCWIP network that traverses the boundaries of both Havant and Winchester. The development will also need to consider and support the delivery of the South East Hampshire Rapid Transit (SEHRT) proposals including the Ladybridge Road / London Road roundabout and improvements to the passenger experience and journey time reliability along the A3 London Road Corridor.


Add new paragraph after 13.12:

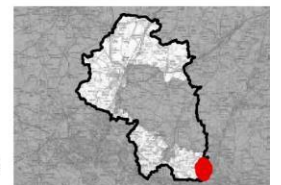
The development of this site needs to refer to the Winchester District Stage 2 Strategic Flood Risk Assessment and a site specific Flood Risk Assessment will demonstrate how development will be safe over the lifetime. access and egress will need to be considered and should be addressed in consultation with the emergency planners.

SH2c: West of Waterlooville Newlands

Proposed use: Mixed use




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IIA Objective	Score
IIA1: climate change mitigation	Minor negative (-)
IIA2: travel and air quality	Minor negative (-)
IIA4: health and wellbeing	Minor positive (+)
IIA7: services and facilities	Minor negative (-)
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	Negligible (0)
IIA13: water resources	Significant negative (--)
IIA14: flood risk	Negligible (0)

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 negative (-)

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

Justification: The site is within 400m of an NHS GP surgery. It is not within 1,200m of a primary school. The site contains a primary school, which could be lost to development. It is not within 2,000m of a secondary school. It is not within 1,200m of a town centre. It is not within 800m of a district or local centre. It is not within 2,000m 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. Less 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 lowest 20% of average commuting distances for the plan area.

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

Overall effect: Minor negative (-)

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

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

Overall effect: Minor positive (+)

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

Justification: The site is not 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 not within 400m of a wastewater treatment works or within 250m of a waste management facility. The site is within 400m of an NHS GP surgery. It is within 300m of open space, open country or registered common land. Less 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 negative (-)

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?) Positive due to employment allocation?

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: Major negative (--); 9c: Major 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 within a locally designated wildlife site or ancient woodland. It is within 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: Negligible (0)

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

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

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

Overall effect: Significant negative (--)

Justification: The site falls within a Source Protection Zone 1.

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

Overall effect: Negligible (0)

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

Justification: Less than 25% of the site is within flood zone 2 or 3. Less than 25% of the site has a 1 in 100 year or 1 in 30 year risk of surface water flooding.