

Integrated Impact Assessment (IIA) evidence base

Respondent Number	Comment	Officer comment
<p>ANON-KSAR-NK4N-C</p>	<p>Reference Chapter 4 and Table 4.3.</p> <p>I support the exclusion of CS6, CS10-CS14 from the allocations.</p> <p>There is very limited local infrastructure to support further development in the area (single track roads, sub-standard sight lines on access roads and landscape of the area as described in the Compton Down LADS)</p> <p>In addition this area is prime agricultural land with run-off to the Itchen river.</p>	<p>Support noted and welcomed.</p> <p>Recommended response: No change</p>
<p>ANON-KSAR-NKQU-G</p>	<p>Appendix E, site assessment criteria.</p> <p>The site assessment criteria in respect to distances to GP surgeries, primary schools, secondary schools, town centres, district & local centres, fails to take account of sustainable transport links such as bus services. While criteria 1g relates to distance from a bus stop, this doesn't adequately assess the routes and service available. By failing to appropriately weight adequacy and frequency of sustainable transport links the assessment process fails to properly address net zero target.</p>	<p>The responses to the comments on the IIA have been summarised and responded to in Appendix A of the IIA. The full document can be found here.</p> <p>ANON-KSAR-NKQU-G noted that the site assessment criteria fails to sufficiently take account of sustainable transport links such as bus services by failing to weight adequacy and frequency of sustainable transport links and adequately assess the routes and service available. The IIA is written with the consideration of the most up to date and consistently available evidence across the study area. In order to provide consistency, detailed site assessment criteria relating to</p>

		each of the IIA objectives were developed and applied during the appraisal of site options. Information relating to the adequacy and frequency of bus services is piecemeal and in constant flux and was therefore considered insufficiently consistent to be used effectively in the IIA.
ANON-KSAR-NKA2-W	<p>Chapter 4 and Table 4.3</p> <p>I support the exclusion of CS6, CS10-14 from the allocations on the basis of</p> <ul style="list-style-type: none"> - lack of local infrastructure, single track privately owned roads - inadequate sight line on access roads - valued landscape of the area (see Compton Down LADS) - prime agricultural nature of the land direct run off to an Itchen tributary (mineral sensitivity) - lack of local employment 	<p>Support noted and welcomed.</p> <p>Recommended response: No change</p>
ANON-KSAR-NKJ4-8	<p>Please see accompanying Representations as the tables have not formatted correctly below.</p> <p>Evidence Base</p> <p>7.1 The Integrated Impact Assessment (IIA) forms part of the evidence base underpinning the Local Plan.</p> <p>7.2 The IIA considers the sites assessed within WCC's Strategic Housing and Economic Land Availability Assessment (SHELAA) 2021 and considers each site against 14 objectives. It should be noted that the actual assessment only considers sites against 11 of these objectives.</p> <p>7.3 Land at Pitt Vale has been promoted by Vistry Partnerships (and Linden Homes previously) for inclusion within the Local Plan for a number of years. It was assessed under SHELAA reference HU03. Table 1 sets out the scores assigned in the IIA.</p>	<p>The responses to the comments on the IIA have been summarised and responded to in Appendix A of the IIA. The full document can be found here.</p>

	<p>Table 1: Assessment of Land at Pitt Vale, Winchester</p> <table border="1"> <thead> <tr> <th>I/A Objective</th> <th>Score</th> </tr> </thead> <tbody> <tr> <td>IIA1: climate change mitigation</td> <td>Minor positive (+)</td> </tr> <tr> <td>IIA2: travel and air quality</td> <td>Minor positive (+)</td> </tr> <tr> <td>IIA4: health and wellbeing</td> <td>Minor positive (+)</td> </tr> <tr> <td>IIA7: services and facilities</td> <td>Minor positive (+)</td> </tr> <tr> <td>IIA8: economy</td> <td>Negligible uncertain (0?)</td> </tr> <tr> <td>IIA9: biodiversity and geodiversity</td> <td>Significant negative (--)</td> </tr> <tr> <td>IIA10: landscape</td> <td>Minor negative uncertain (-?)</td> </tr> <tr> <td>IIA11: historic environment</td> <td>Negligible uncertain (0?)</td> </tr> <tr> <td>IIA12: natural resources</td> <td>Significant negative (--)</td> </tr> <tr> <td>IIA13: water resources</td> <td>Negligible (0)</td> </tr> <tr> <td>IIA14: flood risk</td> <td>Negligible (0)</td> </tr> </tbody> </table> <p>7.4 Whilst the assessment is set out in the IIA, an explanation of the criteria can be found in the 'Development Strategy and Site Selection 2022' document.</p> <p>7.5 Vistry Partnerships have assessed the criteria and the following comments can be made on the assessment of Land at Pitt Vale.</p> <p>Objective IIA1: climate change mitigation</p> <p>7.6 The aim of this objective is to minimise the District's contribution to climate change through a reduction of greenhouse gas emissions with the site appraisal criteria based around the location of facilities including GP surgeries, primary and secondary schools, town centres, local centres, railway station and bus stops, open space and employment.</p> <p>7.7 Land at Pitt Vale is excellently located on the outskirts of Winchester and truly represents a 15-minute neighbourhood. Within a 15-minute walk, the following facilities can be reached:</p> <ul style="list-style-type: none"> • Pitt Park and Ride, Pitt Park and Ride Bus Stops, Pitt Village Bus Stops and Pitt Roundabout Bus Stop 	I/A Objective	Score	IIA1: climate change mitigation	Minor positive (+)	IIA2: travel and air quality	Minor positive (+)	IIA4: health and wellbeing	Minor positive (+)	IIA7: services and facilities	Minor positive (+)	IIA8: economy	Negligible uncertain (0?)	IIA9: biodiversity and geodiversity	Significant negative (--)	IIA10: landscape	Minor negative uncertain (-?)	IIA11: historic environment	Negligible uncertain (0?)	IIA12: natural resources	Significant negative (--)	IIA13: water resources	Negligible (0)	IIA14: flood risk	Negligible (0)	
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	<ul style="list-style-type: none"> • St Peter's Primary School • Oliver Battery Dental Surgery • The Prior Hair Lounge • One Stop and Londis Convenience Stores • Oliver Battery Post Office • Barlow's Butchers • St Stephen's Catholic Church • South Winchester Golf Course • Walpole Road and Manor Road playgrounds <p>7.8 Within a 15-minute cycle, the following additional facilities can be reached:</p> <ul style="list-style-type: none"> • 5 x nursery schools • 8 x primary schools • 2 x secondary schools • Sixth Form College • University of Westminster • Winchester School of Art • 12 x dentists • 4 x pharmacies • 4 x GP surgeries • Royal Hampshire County Hospital • 3 x Churches • Winchester Railway Station • St Cross Cricket Club • Winchester and District Canoe Club • Fallodon and Winnall Moors Nature Reserves • Theatre Royal Winchester • Everyman Cinema, • Soft Play • Parks and Abbey Gardens • Bar End Sports Stadium <p>7.9 The IIA Appendix F sets out an assessment of the site</p>	
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	<p>against the criteria and notes that the site is not located within 2,000m of a railway station, which presumably explains only a Minor Positive score being given.</p> <p>7.10 Given the emphasis of a 15-minute neighbourhood within the draft Local Plan, and the fundamental emphasis of the climate emergency, the fact that Land at Pitt Vale is well placed to reach key facilities within either a 15-minute walk or cycle should, in Vistry Partnerships opinion, be given significant weight.</p> <p>7.11 Therefore, Vistry Partnerships consider the score of 'Significant positive effect likely' to be recorded.</p> <p>Objective IIA2: travel and air quality</p> <p>7.12 This objective aims to reduce the need to travel by private vehicle in the District and to subsequently improve air quality.</p> <p>7.13 As demonstrated above, Land at Pitt Vale is very well positioned to provide a truly 15-minute neighbourhood with 15-minute walking and cycling to a wide range of facilities ranging from retail, health, leisure, religious buildings, schools and employment. The ability to reach these locations by sustainable modes of transport is a significantly positive factor for the Land at Pitt Vale site and the score should be upgraded accordingly to 'Significant Positive'.</p> <p>Objective IIA4: health and wellbeing</p> <p>7.14 Objective 4 seeks to improve public health and wellbeing and reduce health inequalities in the District.</p> <p>7.15 The IIA sets out the following commentary regarding Land at Pitt Vale:</p> <p>"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</p>	
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	<p>Southampton Airport. It is not within 400m of a wastewater treatment works or within 250m of a waste management facility. The site is within 801-1,200m of an NHS GP surgery. It is within 300m of open space, open country or registered common land. The site contains no open space, open country or registered common land. It is within 200m of a public right of way or cycle path.”</p> <p>7.16 This commentary sets out that Land at Pitt Vale is not located in a place which is associated with poor health. It states that the site does not contain open space, open country or registered common land. However, it correctly points out that open space is within 300m of the site. Our proposals also include the provision of new public open space providing greater public accessibility to this edge of settlement location.</p> <p>7.17 Vistry Partnerships consider the score for the site should be upgraded to ‘Significant Positive’.</p> <p>Objective IIA7: services and facilities</p> <p>7.18 This objective seeks to ensure essential services and facilities and jobs in the District are accessible with the same assessment criteria as Objective 1. For the reasons set out for Objective 1, the score should be upgraded accordingly to ‘Significant Positive’.</p> <p>Objective IIA9: biodiversity and geodiversity</p> <p>7.19 Land at Pitt Vale has been scored ‘Significant Negative’ against this criteria with the IIA noting that the site is within 500m of a locally designated wildlife site or ancient woodland and within 200m of a priority habitat.</p> <p>7.20 It is important to confirm that there are no locally designated wildlife sites, ancient woodland or priority habitat within the site itself.</p> <p>7.21 The location of Land at Pitt Vale within the vicinity of a locally designated wildlife site and protected habitat does not</p>	
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	<p>have to be negative. In fact, a sensitive development of the site with appropriate buffers where necessary would add an additional level of protection to the wildlife site and priority habitat. As such, in Vistry Partnerships opinion the score should be upgraded to at least 'Negligible'.</p> <p>Objective IIA10: landscape</p> <p>7.22 This objective seeks to conserve and enhance the character and distinctiveness of the District's landscapes. Land at Pitt Vale scores 'minor negative uncertain' with an explanation provided that the site has medium or higher overall landscape sensitivity.</p> <p>7.23 As set out within the Vision Document which supported the previous iteration of representations, and as seen again in Appendix 2, the development would be designed sensitively to respond to the landscape characters of the site. The visually sensitive upper slopes of the site would be kept free from development and dedicated to public open space with built form only located on the lower part of the site. Vistry Partnerships proposed vision for the site therefore proposes that development would cover only 8.4ha of the site with over 15ha of public open space. The site is currently not accessible to the public and the development of the site would therefore provide 15ha of open space which would be publicly available for a range of recreational uses.</p> <p>7.24 There are no logical landscape features present within the site which act to constrain the limits of development. Vistry Partnerships have undertaken a review of historic mapping which identified a number of former field boundaries which have been lost due to field amalgamation. This provides an opportunity to reinstate the Site's former landscape structure which provides an additional benefit of ensuring there is a definitive edge to the development and settlement and actual</p>	
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	<p>and perceived separation between Land at Pitt Vale and Pitt itself.</p> <p>7.25 Whilst WCC consider the site to have medium or high landscape sensitivity, as set out above, development at Land at Pitt Vale would be sensitively designed to respond to the landscape character on site. As such, the score should be updated to 'Negligible'.</p> <p>Objective IIA11: historic environment</p> <p>7.26 Objective 11 seeks to conserve and enhance the District's historic environment with the site scoring 'Negative Uncertain'.</p> <p>7.27 There are no listed buildings within the development site in itself. In proximity to the site are 12 Grade II listed buildings and one listed milestone. Six of the listed buildings and the listed milestone are located along Enmill Lane, to the south west of the site. The other 6 listed buildings are located in the former Pitt Manor Farm (on the southern side of the Romsey Road).</p> <p>7.28 The setting of the listed buildings along Enmill Lane would not be changed to the extent that the significance of the buildings would be harmed. Furthermore, the character of the existing settings are not dependant on wide or expansive views of the development site as the existing trees and hedgerows in the area limit views beyond the curtilage of the houses.</p> <p>7.29 The 6 listed buildings that form the former Manor Farm do not have a traditional quiet or tranquil rural location that would be compromised by the development of the application site. The wider setting of these buildings are largely to the south east and relate more logically to the edge of the town to the east. The existing setting of these listed buildings has already changed because of the proximity to this built edge and the clear views of Oliver's Battery from within the settings of the listed buildings. Therefore, the development of the site to the</p>	
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	<p>north of the former Manor Farm would not affect the significance of the listed buildings.</p> <p>7.30 There is a garden of local significance at Pitt Manor, on Kilham Road to the north east of the site. However, this is not a national designation and the garden is a sufficient distance away not to be affected by any proposals on the site.</p> <p>7.31 Given there would be no harmful impact on the historic environment, Vistry Partnerships consider the score should be updated to 'Minor Positive'.</p> <p>7.32 Table 2 below sets out the assessment scores given by WCC and the reasonable adjustments that should be given noting the above commentary:</p> <p>Table 2: Comparison of IIA assessment by WCC and Vistry Partnerships</p> <table border="1"> <thead> <tr> <th>IIA Objective</th> <th>Score</th> <th>Vistry Partnerships Assessment</th> </tr> </thead> <tbody> <tr> <td>IIA1: climate change mitigation</td> <td>Minor positive (+)</td> <td>Significant Positive (++)</td> </tr> <tr> <td>IIA2: travel and air quality</td> <td>Minor positive (+)</td> <td>Significant Positive (++)</td> </tr> <tr> <td>IIA4: health and wellbeing</td> <td>Minor positive (+)</td> <td>Significant Positive (++)</td> </tr> <tr> <td>IIA7: services and facilities</td> <td>Minor positive (+)</td> <td>Significant Positive (++)</td> </tr> <tr> <td>IIA8: economy</td> <td>Negligible uncertain (0?)</td> <td>Negligible uncertain (0?)</td> </tr> <tr> <td>IIA9: biodiversity and geodiversity</td> <td>Significant negative (--)</td> <td>Negligible (0)</td> </tr> <tr> <td>IIA10: landscape</td> <td>Minor negative uncertain (-?)</td> <td>Negligible (0)</td> </tr> <tr> <td>IIA11: historic environment</td> <td>Negligible uncertain (0?)</td> <td>Minor positive (+)</td> </tr> <tr> <td>IIA12: natural resources</td> <td>Significant negative (--)</td> <td>Significant negative (--)</td> </tr> </tbody> </table>	IIA Objective	Score	Vistry Partnerships Assessment	IIA1: climate change mitigation	Minor positive (+)	Significant Positive (++)	IIA2: travel and air quality	Minor positive (+)	Significant Positive (++)	IIA4: health and wellbeing	Minor positive (+)	Significant Positive (++)	IIA7: services and facilities	Minor positive (+)	Significant Positive (++)	IIA8: economy	Negligible uncertain (0?)	Negligible uncertain (0?)	IIA9: biodiversity and geodiversity	Significant negative (--)	Negligible (0)	IIA10: landscape	Minor negative uncertain (-?)	Negligible (0)	IIA11: historic environment	Negligible uncertain (0?)	Minor positive (+)	IIA12: natural resources	Significant negative (--)	Significant negative (--)	
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appropriate that WCC respond to such criticism to ensure the IIA is an appropriate document to form part of the evidence base.

Olivers Battery Parish Council response

7.37 The Development Strategy and Site Selection document includes the response from the Olivers Battery Parish Council to all sites in their area within the SHELAA.

7.38 The percentage of opposition (as set out in the Development Strategy and Site Selection document) to the 5 sites within Olivers Battery is set out, as follows.

Table 3: Response from Olivers Battery to SHELAA sites

Site % of responses opposing development at the site

Texas Field 95%

Port Lane (part of Royaldown site) 94%

South Winchester Golf Course 80%

Maybush 68%

Pitt Vale 66%

7.39 The document continues to state “Both Maybush and Pitt Vale offer some limited indication of support for development”.

7.40 Development at Land at Pitt Vale is therefore de facto the Parish’s communities preferred site in the vicinity of Olivers Battery.

7.41 The location of Olivers Battery adjacent to Winchester Town is important to consider in relation to site selection and the spatial strategy. Development of Land at Pitt Vale would contribute towards housing within Winchester Town and, as set out previously, Vistry Partnerships believe additional housing should be allocated to Winchester to reflect its position as the primary settlement within the District. Furthermore, Land at Pitt Vale reflects a sustainable location for development which

	reflects the principles of the 15-minute neighbourhood set out within the draft Local Plan.	
<u>ANON-KSAR-NKTJ-8</u>	<p>IIA Objective 12 - Littleton Nursery</p> <p>The assessment of the site is incorrect.</p> <p>The Justification for the score states that: The majority of the site contains brownfield land. A significant proportion of the site (>=25%) is on Grade 3 agricultural land or less than 25% of the site is on Grade 1 or 2 agricultural land. Less than 25% of the site is within a Mineral Safeguarding Area.</p> <p>The land is 100% brownfield with 2 lawful development certificates issued by WCC, with the site used for B8 storage and is 100% hardstanding.</p> <p>The land to the west of Littleton is also not within a Mineral Safeguarding Area.</p> <p>It is not known how the assessment has concluded that the land is on agricultural land, with it being 100% hardstanding, and given it is one of a very few brownfield land opportunities available to the Council, the assessment should be re done and the conclusion adjusted accordingly.</p>	<p>The responses to the comments on the IIA have been summarised and responded to in Appendix A of the IIA. The full document can be found <u>here</u>.</p> <p>ANON-KSAR-NKTJ-8 stated that the site at Littleton Nursery (LH11) should have been appraised as being wholly brownfield and lying entirely outside of any areas of higher value agricultural land and Mineral Safeguarding Areas. It is acknowledged that the site lies on brownfield land and the site assessment in the IIA Report for Regulation 18 version Local Plan (and this version of the IIA Report) reflects this. However, based on Natural England's agricultural land classification, the site comprises entirely Grade 3 agricultural land. The potential loss of the higher value soils on the site is reflected in the minor negative effect recorded overall for IIA objective 12: natural resources for this site.</p>
<u>ANON-KSAR-NKJV-A</u>	<p>Winchester City Council commissioned LUC in May 2020 to carry out an Integrated Impact Assessment (IIA), and Habitats Regulations Assessment (HRA) of the emerging Winchester District Local Plan. The IIA comprised of a Sustainability Assessment (SA), incorporating Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA).</p>	<p>The responses to the comments on the IIA have been summarised and responded to in Appendix A of the IIA. The full document can be found <u>here</u>.</p>

Appendix F of the IIA presents the detailed site assessment proformas for each of the site options appraised.

Within the Integrated Impact Assessment Report (Appendix F) the Mill Lane site has been assessed (ref: W102 and W106) against a series of objectives. For the category 'Biodiversity and Geodiversity', the site is assessed as 'significant negative'. This is on the basis that the site is located within a SSSI Impact Risk Zone for residential planning applications, that it is within 500m of a locally designated wildlife site or ancient woodland and is within a priority habitat.

Whilst the site is located within the SSSI Impact Risk Zone for Botley Wood and Everett's and Mushes Copses and Waltham Chase Meadows SSSI, given the distance between the site and these designations It is considered unlikely that the development at Mill Lane would adversely affect either site.

There are no locally designated wildlife sites on or adjacent to the site. It is noted that there is deciduous woodland, a priority habitat, close to the site. It is considered unlikely that the development at Mill Lane would adversely affect locally designated sites or priority habitats. The proposed scheme would be designed to retain all trees on site, as far as possible,. The provision of additional planting along the northern boundary, including gapping up of the tree line, of the residential development would help to enhance connectivity of green infrastructure in the locality, connecting woodland areas.

For the category 'natural resources' the Site is assessed as 'significant negative'. This is on the basis that the majority of the site is greenfield, that a significant proportion of the site is

	<p>either grade 3 agricultural land or that less than 25% of the site is grade 1 or 2 agricultural land. It also identifies that a significant proportion of the site is within a Minerals Safeguarding Area.</p> <p>Whilst it is acknowledged that the site is greenfield, the site is located in a highly sustainable location. Natural England data indicates that the site is undifferentiated grade 3, which is classed as good to moderate. Detailed surveys will be undertaken to determine the quality of land in due course.</p> <p>Whilst the site falls within the Hampshire Minerals and Waste Local Plan Mineral Consultation Area, this is not considered to be a constraint to development. It is noted that in response to an application for 120 dwellings adjacent to the site, which was approved on 24 June 2019 (ref 17/02615/FUL), HCC stated that the overlap of the minerals and waste consultation area was minimal and raised no objection.</p> <p>With the exception of the Land North of Amberwood site, the Land at Mill Lane site performs better in assessment terms than any of the other sites shortlisted by Wickham Parish Council. If additional housing is brought forward in Wickham, Land at Mill Lane is one of the best and most sustainable sites that is available for development. It is considered that it better relates to existing facilities in Wickham than Land North of Amberwood and offers advantages that the Land North of Amberwood site cannot, including the potential to provide additional car parking for the doctor's surgery and its immediate proximity to the proposed recreation ground.</p>	
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[ANON-
KSAR-
NKUC-2](#)

The Proposed Approach to Wickham

6.46 As described above, there are strong strategic reasons that justify a greater apportionment of housing growth to settlements within the Market Towns and Rural Area category. This is necessary to improve the effectiveness of the Plan and ensure it contributes to sustainable patterns of development. This includes apportioning additional housing growth to Wickham.

6.47 The Settlement Hierarchy Review (November 2022) identifies Wickham as a 'Larger Settlement' and provides an overall assessment scoring of '26'. This infers that Wickham is the fifth most sustainable settlement within the Plan area. It is particularly concerning then that the proposed 'new' allocation at Wickham, as set out at Draft Policy WK4 ('Land North of Ravenswood House'), is a site that already benefits from planning permission⁶ and is located at Knowle.

6.48 Knowle and Wickham are entirely different settlements, with separate settlement boundaries.

The proposed Local Plan settlement hierarchy indicates that Knowle falls within the 'Smaller Rural Settlements' category, which is the lowest tier of settlement. The Settlement Hierarchy Review awards Knowle an overall score of '17' and ranks Knowle (alongside Curdrige) as the 16th most sustainable settlement within the Plan-area.

6.49 WCC has not provided adequate justification to explain how the proposed approach to 'Wickham' promotes sustainable patterns of development or is consistent with the envisaged spatial strategy, and settlement hierarchy. The spatial strategy plainly does not proport to distribute growth by Parish area and the evidence base assesses sites in relation to settlements. Yet, in the case of Wickham, the approach in the

The responses to the comments on the IIA have been summarised and responded to in Appendix A of the IIA. The full document can be found [here](#).

	<p>Draft Local Plan appears to adopt the Parish boundary as the unit of analysis and without any reasonable justification.</p> <p>6.50 Indeed, at paragraph 6.29 (and separately at page 57 of that document), the Development Strategy and Site Selection report appears to indicate the decision to allocate Land North of Ravenswood House simply reflects the preferences on Wickham Parish Council. The IIA also confirms that this site performs poorly when compared to the identified alternatives. This is hardly a surprising conclusion, given that Knowle is a much less sustainable settlement than Wickham.</p> <p>6.51 A further concern, is that Catesby's land interest (ref. WI19) has been excluded from shortlist of sites presented at paragraph 6.28 of the Development Strategy and Site Selection report. In drawing-up the shortlist, WCC appear to have excluded any site that does not directly adjoining 6 Ref. 18/01612/OUT the existing settlement boundary. This is not a reasonable approach, as the current settlement boundary at Wickham does not extend to include all the built-up area at the settlement, particularly to the north west. Catesby's land interests at Land South of Titchfield Lane adjoin the actual extent of built form of the settlement. Even if this were not the case, the methodologies supposedly applied in the IAA and the Development Strategy and Site Selection report, do not suggest that site's not directly adjoining the settlement boundary should automatically be excluded from further consideration.</p> <p>6.52 The exclusion of site WI19 from the shortlist is therefore arbitrary. This is particularly the case, when it is noted that the site performs comparably to those alternatives that were shortlisted.</p> <p>This is indicated in Figures 1 and 2 below</p>	
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	<p>Figure 1 - IIA evaluation of WI19 (Land South of Titchfield Lane)</p> <p>Figure 2 – IAA evaluation of shortlisted sites at Wickham (Figures on SharePoint)</p> <p>6.53 The omission of site WI19 from shortlist is not justified, noting that the IIA scoring for WI19 is virtually identical to those that were included. What this in turn means, is that WCC has failed to properly consider the potential for this site to meet housing needs and provide potential community benefits that might not be achievable at the identified alternatives. This arbitrary approach means that WCC cannot demonstrate that the Draft Local Plan (at least as applicable to Wickham), is consistent with the conclusions of the IIA and contributes to sustainable patterns of development.</p> <p>6.54 Overall, the currently proposed approach to ‘Wickham’ is not justified, nor consistent with national planning policies and legislation, which require the Local Plan to contribute to sustainable development. This is an issue that goes to the heart of the Draft Local Plan and which therefore necessitates revision, in order that the Plan can be made sound.</p> <p><i>IAA Evaluation of WI19 Land South of Titchfield Lane</i></p> <p>6.55 In addition to the concerns raised above, Catesby also consider that the IIA scoring of the site requires refinement. Overleaf, in Table 1, we provide a revised assessment, with associated commentary.</p> <p>Additional information received</p>	
<p>ANON-KSAR-N8Y2-2</p>	<p>Would like to support the exclusion of sites CS6, CS10, CS11, CS12, CS13 and CS14. In Compton there is a significant lack of infrastructure, single track roads in multiple private</p>	<p>Support noted and welcomed.</p> <p>Recommended response: No change</p>

	<p>ownership and there are inadequate (below minimum standard) sight lines on the access roads.</p> <p>The sites are currently prime agricultural land which would be sacrificed (MATR4), they are countryside with a high landscape value with multiple TPOs.</p> <p>There is little local employment.</p> <p>The sites run off into a tributary of the Itchen and are presumably nitrate sensitive zones.</p>	
<p>ANON-KSAR-N8QR-T</p>	<p>Additional information received. A report format copy of our full representation to the regulation 18 consultation has been sent to planningpolicy@winchester.gov.uk. Below is copied the relevant extract of the full representation relating to the IIA. Our comments on the IIA below relate principally to Appendix F of the IIA, site assessment form WI18 (starting at PDF page 1069).</p> <p>Homes England support the sites proposed allocation under Policy WK4. To help support the sites allocation, it is suggested that at the next stages of the plans development the significant amount of technical work to support the current application on the site are considered to inform the Integrated Impact Assessment Report (IIA).</p> <p>It is appreciated that at this stage the IIA is conducted at a high level to review sites against the spatial strategy options and objectives. However, given the high level of information already with the council, it appears doubtful that the site assessment for the site (reference WI18: Land north of Ravenswood House</p>	<p>The responses to the comments on the IIA have been summarised and responded to in Appendix A of the IIA. The full document can be found here.</p> <p>ANON-KSAR-N8QR-T noted that the assessment of site WI18: Land north of Ravenswood House Hospital does not appear to recognise the allocation of the Welborne strategic development to the East in Fareham Borough or the proposed improved connections facilitated by the proposals. Where site allocations were close to the District boundary, the spatial analysis was potentially affected by the fact that some spatial data required for proximitybased assessments was not available for all or part of neighbouring districts. At all locations in the District and its immediate surroundings, data that is available at a national level (for example, railway stations, biodiversity designations and AQMAs) was drawn upon to</p>

	<p>Hospital) fully takes account of the significant technical work undertaken to support the planning application. If the detailed technical work had been taken into account, it is considered this would result in the reduction of negative scorings and an increase in positive benefits. Furthermore, the assessment area does not appear to include the Meon Water Meadows and Knowle Triangle which constitute one of the key benefits of the scheme.</p> <p>Consultation replies, as well as Officer's recommendation to support the application, show that the development of the site is acceptable and does not result in any significant negative implications.</p> <p>Finally, the assessment of the site's suitability in sustainability terms, under IIA7 in particular, does not appear to recognise the allocation of the Welborne strategic development to the East (albeit in Fareham Borough) or the proposed improved connections facilitated by the proposals, including the Meon Trail.</p>	<p>inform the appraisal work. However, data relating to services and facilities was only available at the District level (i.e. for areas within the boundaries of Winchester District only) and this is noted as a limitation in Chapter 2.</p>
<p><u>ANON-KSAR-N85A-D</u></p>	<p>Integrated Impact Assessment (IIA) The IIA acts as a Sustainability Assessment-style document in support of the approach taken by the Plan. Table 5.47 of the IIA scores site BW17 against the IIA objectives. This table is reproduced below (properly formatted in the PDF copy of the representations submitted by email): IIA Objective Site BW17 Site considering mitigation in draft Policy BW4 IIA1: Climate Change Mitigation + + IIA2: Travel and Air Quality + + IIA4: Health and Wellbeing + + IIA7: Services and Facilities + +</p>	<p>The responses to the comments on the IIA have been summarised and responded to in Appendix A of the IIA. The full document can be found here.</p>

	<p>IIA8: Economy 0? 0? IIA9: Biodiversity and Geodiversity -- -- IIA10: Landscape -? 0? IIA11: Historic Environment 0? 0? IIA12: Natural Resources -- -- IIA13: Water Resources 0 0 IIA14: Flood Risk 0 0</p> <p>Crest Nicholson has strong reservations in relation to the scoring against the following objectives, in particular:</p> <ul style="list-style-type: none"> • IIA1: Climate Change Mitigation – It is very difficult to understand how the IIA has reached the conclusion that developing site ref. BW17, which is currently covered in trees and vegetation (and its development would require their removal) that capture carbon before it reaches the atmosphere, can make a positive contribution towards a climate change objective. Whilst draft Policy CN3 requires residential developments to achieve a net-zero operational carbon emissions it is unclear how even with this mitigation in place that the development of the site can result in a positive impact. Notwithstanding this, the methodology at Appendix E of the IIA suggests that this objective relates only to the proximity of sites to services and facilities, which is firstly a very limited interpretation of the causes of climate change, and secondly results in imbalanced results given that objectives IIA2 and IIA7 also address this matter (as acknowledged by paragraph E.14 of Appendix E of the IIA). Accordingly, this triple-counting artificially enhances the score provided to site BW17. • IIA10: Landscape – The Landscape Character Assessment discussed earlier in these representations is clear that the northern edge of Bishop’s Waltham is very sensitive in landscape terms due to it being immediately adjacent to the SDNP, limited urban fringe activity in this location, and good 	
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	<p>levels of existing screening. Accordingly, the conclusion that without the mitigation set out in draft Policy BW4 (which requires screening) there is only a minor negative effect (despite the potential of introducing a whole new building line along the edge of Bishop's Waltham immediately adjacent to the SWNP) in the assessment of site BW17 is illogical. It is also difficult to understand how the extension of Bishop's Waltham up to boundary of the SDNP through the necessary removal of significant amounts of dense vegetation that is spread across site BW17 can be mitigated to a negligible impact. The development of site BW17 will inevitably result in an increased amount of built form being visible from the SDNP (notably from Public Rights of Way within the designation) and it will increase the extent of urban fringe activities. Accordingly, the IIA's scoring of site ref. BW17's against objective IIA10 is inconsistent with the great weight afforded by the Framework to valued landscapes (paragraph 176) and fails to reflect the Council's own Landscape Character Assessment.</p> <ul style="list-style-type: none">• IIA11: Heritage – The development of site BW17 relies on the creation of an access point (the suitability of which in highways safety terms is uncertain within the Plan's evidence base) through the demolition of existing properties within the same building line as, and within 80m of, the Grade II listed Middle Hoe Cottage (and curtilage listed barn). It will also result in development immediately to the rear of the curtilage of the listed buildings. As discussed later in these representations, the Heritage Assessment that forms part of the evidence base notes that there is likely to be some impact on the significance of heritage assets through the development of site BW17. Given that the Framework places great weight to preserving the significance of heritage assets, it appears as	
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	<p>though the IIA’s conclusion that the development of the site with mitigation (let alone without mitigation) would have negligible impacts with respect to this objective is not justified. In light of the above, Crest Nicholson considers that the IIA’s approach to assessing the Plan and the conclusions that have been reached are significantly flawed.</p>	
<p><u>ANON- KSAR-N8Q1- S</u></p>	<p>Reviewing the IIA, it does not adequately test reasonable alternatives, does not address the increasing levels of unmet need arising from the PfSH area (and the consequent impact that has on the sustainability of any spatial strategy), and does not adequately assess potential sites.</p> <p>With regards to its testing of reasonable alternatives – which informs the plan’s spatial strategy (see our response to Policy SP2) – the IIA only tests options of meeting either 14,000 homes in three scenarios (which is below the district’s local housing need) or 15,620 homes in one other scenario (Table 4.1). There is no consideration of delivering different levels of housing growth above purely the local housing need to provide for different levels of unmet need arising from the PfSH as well as a buffer for non-delivery.</p> <p>Given this, all the different options do is test how roughly the same number of homes could be delivered spatially within in the district; not accounting for local unmet needs which are significant. Therefore, these options do not provide reasonable alternatives to base a spatial strategy on.</p> <p>As identified in our earlier comments to Policy CN1 regarding the conclusions of MI04 – Land at Micheldever Station, it is considered that the findings of the IIA regarding this site have not considered the site fairly, accurately or consistent with the</p>	<p>The responses to the comments on the IIA have been summarised and responded to in Appendix A of the IIA. The full document can be found here.</p> <p>ANON-KSAR-N8Q1-S noted that any development at a strategic scale at site MI04 would include delivery of new GP surgeries and schools, as well as the provision of new areas of publicly accessible open space. The IIA of site options has been based on their location and extent in the context of known baseline information so that all options can be appraised to the same level of detail. The effects of the provision of additional services and facilities as well as environmental mitigation and enhancement measures within preferred site allocations is considered through the appraisal of detailed site allocation policies later in the IIA process.</p>

	<p>remainder of the IIA evidence.</p> <p>IIA Objective 1 states that:</p> <p>“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”</p> <p>The score assigned to MI04 is that the proposal would result in a minor negative. However, the justification for this score is that the site is not within 1,200m of a GP surgery or a primary school, over 2,000m from a secondary school and would result in the loss of open space. Clearly any development at a strategic scale on this site would include delivery of new GP surgeries and schools, as well as the provision of new areas of publicly accessible open space and open-up routes into the countryside which would be more usable for members of the public than the currently largely inaccessible private land. Further, concerns raised that the majority of the site would have an average commuting distance that is 81-100% range for the plan area would also be alleviated and clearly offset by the availability of public transport links (both existing and upgraded) from new development in this location and also the provision of local employment opportunities. In this regard the IIA’s methodology wholly fails to address</p> <p>IIA Objective 9 also find that the site would have a significant negative impact on the district’s biodiversity and geodiversity. Whilst it is noted that the site sits in close proximity to a local wildlife site or ancient woodland, no consideration is given to the delivery of a waste water treatment plant which would utilise effective nitrogen filtering which would in actuality result</p>	
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	<p>in a net-positive benefit (i.e. a net reduction in nitrates from the area). Given the nutrient nitrate advice published by Natural England and update from DLUHC in July 2022, it is considered that the potential to achieve a net benefit on nitrates should be afforded significant weight, and is not something that would result in an overall 'significant negative'</p> <p>In the case of the Fair Oak SGO in the aforementioned Eastleigh Local Plan, the Inspector also came to this conclusion regarding the Sustainability appraisal (SA), where it was considered that the SGO alternatives had greater merit in meeting transport/accessibility aims and were more beneficial in terms of protecting settlement gaps. The inaccurate scoring of the SA was one element upon which the Inspector considered that the approach to the site selection of the SGO did not represent a justified and evidence-based approach.</p> <p>It is therefore considered that the scoring of Micheldever Station is unfounded and does not form a reasonable basis for its exclusion.</p>	
<p><u>ANON- KSAR-N8QS- U</u></p>	<p>The Settlement Hierarchy Review (November 2022) reinforces the evident realities compellingly. It makes plain that Winchester is the most sustainable settlement in the District scoring 35, and receives the highest score for both daily journey purposes as well as a very wide range of more specialist and less frequently accessed facilities. This is reiterated in the Development Strategy and Site Selection Study (November 2022) which states "No other settlements in the District approach Winchester in terms of the range of facilities and services they provide, so Winchester is at the top of the settlement hierarchy and is the most sustainable development location in the district" (paragraph 6.2)</p>	<p>The responses to the comments on the IIA have been summarised and responded to in Appendix A of the IIA. The full document can be found here.</p>

This stands in stark contrast to the conclusion of TAS1 even in respect of the South Hampshire Urban Areas (i.e the urban extension areas adjoining PfSH) where the evidence concludes that “SHUAs have very high proportions of car or van ownership by households, as well as higher proportions of residents who are in older age categories than Winchester Town Area. This, combined with the lower levels of service for public transport and active travel modes means that the existing population is likely to have a relatively high dependency on private car travel which could result in issues relating to air quality...as well as worsened high congestion...” (para 2.29). Indeed, at paragraph 2.2.7 TAS1 states that “most existing housing development provide good quality footpaths which are attractive enough for people to consider short trips by foot, however the distances to destinations reduces the attractiveness by this mode. Public transport options current consists of limited and infrequent bus services between settlements”.

In fact, we would expect that as the SHUA Urban Extensions at North Whiteley and West of Waterlooville are built out, a greatly higher level of trip internalisation will follow as major facilities come on line. As far as mode share is concerned, rather better levels of bus service can be expected to be provided following the completion of key length of primary streets. In fact, the extreme fragmentation of the highway network in Whiteley that dates back as long as 30 years, has hugely mitigated against any meaningful level of bus service being sustainable, by any operator. This was further aggravated by extremely serious peak congestion at and around the only vehicular access to the area across M27

junction 7. Likewise the approach to building out Berewood/Newlands has served to make provision of relevant bus services exceptionally difficult.

As these developments progress further the provision of streets supporting suitably direct bus routes and infrastructure should unlock these problems, while services should also respond to the application of developer funding and in response to rising population. All this is likely significantly to ameliorate the current position, which we acknowledge to be quite seriously deficient.

In contrast, the IIA is very clear that ‘In general, the settlements in the Market Towns and Rural Area present relatively high levels of CO2 emissions per capital for commuting, with emissions particularly high at the settlements of South Wonston and Sutton Scotney. The areas to the north and south of the National Park also display relatively high levels of CO2 emissions per capita from commuting. This includes the area around New Alresford’ (paragraph 4.35, our emphasis)

Quite unsurprisingly, the TAS1 evidence provides a similar conclusion in respect of development in MRTAs where it identifies “relatively limited and infrequent bus services link market towns with smaller villages” (para 2.2.10).

Stagecoach does not dispute that some development is required to sustain existing settlements in the MT&RAs to meet local need and help support the vitality of settlements and their service base – including our service 69.

Nevertheless, the plan relies on allocating 4,240 dwellings in

the MT&RAs, including 1750 new plots, which is the largest quantum of newly identified land in the Plan.

Stagecoach operates service 69 running through most of the MRTA settlements concerned between Winchester and Fareham. The service runs hourly, and is commercially quite marginal.

Naturally it is not unreasonable to suppose that a level of development in each of the main MRTA settlements en-route would help secure this service, and even conceivably justify a frequency increase to every 30 minutes making it that much more relevant a choice, both for existing and future residents. However, the latter requires some extremely optimistic assumptions, which we would be uncomfortable giving assurance on. Regrettably, experience and census data on mode split in these settlements for peak journeys, shows that there is more likely to be a greatly larger increase in traffic generation than a rise in bus service patronage. Indeed the existing strategy is likely to give rise to a substantial aggravation of already high car-dependency, as well as a consolidation of extensive patterns of movement and interaction across the plan area. These longer journeys realistically are to a very great extent likely to be by car, as the only practically-relevant option.

However, the future prognosis about the level of use of sustainable modes, including improved bus services, is entirely different to the SHUA sites. It is very hard to see substantial increases in local trip internalisation within these settlements. Nor can we envisage a transformation of the quality of bus provision sufficient to be confident of securing substantial mode shift without a very high level of policy intervention – for

example, increase of service 69 to at least every 30 minute frequency with comprehensive evening and Sunday service; all combined with bus priority at significant pinch points en-route. We see no indication that the plan anticipated taking these measures.

In this regard, Stagecoach take serious issue with the methodology used to assess the relative sustainability of settlements set out in the Settlement Hierarchy Review. The methodology seems to intentionally seek to elide out the profound difference in public transport availability between Winchester and its immediately adjoining areas, and the remaining settlements. This simplistically allocates a maximum of two points to a settlement if it has a minimum hourly bus service. It has no regard to service frequency, range of destinations served, journey time to key destinations or higher-order settlements or timetable coverage – for example is evening and Sunday services are offered. This is crucial to determining the relevance of the service especially when compared to personal car use. The crudeness and inappropriate thresholds used in the SHS make it unfit for purpose, in properly assessing the potential for settlements to accommodate development, having proper and clear regard to greatly reducing car use. In particular, it unjustifiably places Winchester at the same level as a smaller town or large village like Coldens Common.

In the same way, the assessment methodology fails to differentiate properly between the different amount and range of employment contained within each settlement. It does this by offering a single additional point where settlements have two or three places of employment. However, this serves to

	<p>grossly diminish the score of Winchester, which plainly dominates the local labour market and drives the patterns of spatial interaction and housing requirement in most of the plan area. It also serves to greatly overstate the relative sustainability of small settlements with extremely limited employment opportunities, thus helping to justify a policy of rural dispersal.</p> <p>It is hard to avoid drawing the conclusion that the evidence base has been deliberately contrived to drive a pre-determined policy approach, by distorting the evidence base. The evidence seems to have been retrofitted to the strategy. The date of publication of the SHS days before the Consultation opened, unfortunately only serves to help support such a hypothesis.</p> <p>Given the discussion above, even if the housing number provided for is considered appropriate, it is obvious that reducing the allocations at these dispersed settlements by 1000 dwellings and allocating about 1000 extra dwellings adjoining Winchester is bound to be greatly more sustainable. It would clearly accord with the requirements of NPPF, including the requirements regarding transport set out in paragraphs 103-111; properly securing the objectives and vision of the Plan, and achieving a much more sustainable pattern of development that reflects the evidence base of the Plan, as it ought: “option 1”.</p> <p>Leaving the discussion regarding PfSH entirely to one side, with regard to the 1785 units allocated by dispersal, we dispute that this is a demonstrably sustainable strategy, certainly compared with one that seeks to provide a larger number of homes at Winchester.</p>	
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<p style="text-align: center;"><u>ANON- KSAR-N85K- Q</u></p>	<p>Additional information received with tables and figures associated with the below.</p> <p>The Proposed Approach to Colden Common</p> <p>6.46 As described above, there are strong strategic reasons that justify a greater apportionment of housing growth to settlements within the Market Towns and Rural Area category. This is necessary to improve the effectiveness of the Plan and ensure it contributes to sustainable patterns of development. This includes apportioning additional housing growth to Colden Common.</p> <p>6.47 The Settlement Hierarchy Review (November 2022) identifies Colden Common as a ‘Larger Settlement’ and provides an overall assessment scoring of ‘23’. This infers that Colden Common is the seventh most sustainable settlement within the Plan area out of 49 settlements. There is then a strong case for the allocation of additional growth to Colden Common, both to meet needs arising within Winchester District, but also to accommodate unmet needs through the Duty-to-Cooperate.</p> <p>6.48 In terms of allocations proposed at Colden Common, Croudace are particularly concerned that ‘Clayfield Park’ (as identified at Draft Policy CC1) is a ‘recycled’ allocation, which is carried forward having failed to be delivered in previous or current Plan-period. Whilst it is identified for the delivery of 48 dwellings within the early part of the new Plan-period, WCC has provided no evidence to explain why delivery is now more likely to occur.</p> <p>6.49 Site CC1 is indeed subject to several constraints. The land remains partly in commercial use, being occupied by a caravan sales company, and it is not clear when the site may be available for redevelopment. Moreover, the site is former</p>	<p>The responses to the comments on the IIA have been summarised and responded to in Appendix A of the IIA. The full document can be found here.</p>
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brickworks and is therefore likely to be contaminated, with the extent of required remediation being uncertain. It is not clear then that this site can be regarded as available and capable of delivery.

6.50 A separate concern, is that Croudace's land interests (refs. CC03 and CC03b, together with additional land now promoted) has been excluded from shortlist of sites presented at paragraph 6.33 of the Development Strategy and Site Selection report. The Draft Local Plan subsequently fails to allocate the site.

6.51 In drawing-up the shortlist, WCC appear to have identified three new sites (in addition to CC1), which could potentially be allocated; Colden Common Farm (CCO2), Land at Main Road (CC04) and Land Adjoining 85 Church Lane (CC04). What is notable (as set out in Figures 1 and 2 below), is that there is very little difference between the IIA scoring of these sites, when compared to Croudace's interests in Land East of Highbridge Road.

6.52 The main justification for preferring the above sites appears simply to be the preference of the Parish Council, rather than any underlying consideration of suitability, constraints, or sustainability. Indeed, Land East of Highbridge Road is in some respects more sustainably located, noting its immediate proximity to key services such as the Primary School.

6.53 The exclusion of site CC03 and CC03b from the shortlist is therefore arbitrary. This is particularly the case, when noting (aforementioned) concerns regarding the deliverability of Clayfield Park, the inadequate apportionment of growth to settlements within the 'Market Towns and Rural Area' category and the broader matter of addressing unmet needs arising within the PfSH area.

Figure 1 – IIA Evaluation of CC03 and CC03B (Land East of Highbridge Road)

IIA Objective Score

IIA1: climate change mitigation Minor negative uncertain (-?)

IIA2: travel and air quality Minor negative uncertain (-?)

IIA4: health and wellbeing Minor positive (+)

IIA7: services and facilities Minor negative uncertain (-?)

IIA8: economy Negligible uncertain (0?)

IIA9: biodiversity and geodiversity Significant negative (--)

IIA10: landscape Minor negative uncertain (-?)

IIA11: historic environment Negligible uncertain (0?)

IIA12: natural resources Significant negative (--)

IIA13: water resources Significant negative (--)

IIA14: flood risk Negligible (0)

Figure 2 – IIA sites at Colden Common – Shortlisted sites: CC02, CC04, CC15.

6.54 The omission of site CC03 and CC03b from the shortlist is not justified, noting that the IIA scoring for CC03 and CC03b is virtually identical to those that were included. What this in turn means, is that WCC has failed to properly consider the potential for this site to meet housing needs and provide potential community benefits that might not be achievable at the currently favoured sites.

6.55 This arbitrary approach means that WCC cannot demonstrate that the Draft Local Plan (at least as applicable to Colden Common), is consistent with the conclusions of the IIA and contributes to sustainable patterns of development.

IIA Evaluation of CC03 and CC03b

6.56 In addition to the concerns raised above, Croudace also

	<p>consider that the IIA scoring of the site requires refinement. Below, in Table 1, we provide a revised assessment, with associated commentary.</p> <p>Table 1: Comparison of IIA Assessment by WCC and Boyer</p> <table border="1"> <thead> <tr> <th>IIA Objective</th> <th>WCC Score</th> <th>Boyer Score</th> <th>Commentary</th> </tr> </thead> <tbody> <tr> <td>IIA1: climate change mitigation</td> <td>Minor</td> <td>negative uncertain (-?)</td> <td>Negligible (0) The site is well located near the centre of Colden Common and the following facilities can be reached within a 15-minute walk via routes that benefit from existing public walkways: Colden Common Primary School, Colden Common Surgery, a Co-Operative foodstore, and the Dog & Crook public house. Other services, such as the post office, medical practice, chemist, further public houses and restaurants, and existing areas of open space are also within a 15-minute walk.</td> </tr> <tr> <td colspan="4"> <p>Given the emphasis of a 15-minute neighbourhood within the draft Local Plan, and the fundamental emphasis of the Climate Emergency, the fact that Land East of Highbridge Road is well placed to reach a wide range of facilities justifies at least a neutral ('negligible score).</p> </td> </tr> <tr> <td>IIA2: travel and air quality</td> <td>Minor</td> <td>negative uncertain (-?)</td> <td>Negligible (0) As demonstrated above, Land East of Highbridge Road is very well positioned to provide a 15-minute neighbourhood within a 15-minute walking range are facilities ranging from retail, health, leisure, religious buildings, schools and employment. The ability to reach these locations by sustainable modes of transport is a positive factor for the Land east of Highbridge Road site and the score should be upgraded accordingly</td> </tr> <tr> <td>IIA4: health and wellbeing</td> <td>Minor</td> <td>positive (+)</td> <td>Significant Positive (++) The IIA commentary sets out that Land east of</td> </tr> </tbody> </table>	IIA Objective	WCC Score	Boyer Score	Commentary	IIA1: climate change mitigation	Minor	negative uncertain (-?)	Negligible (0) The site is well located near the centre of Colden Common and the following facilities can be reached within a 15-minute walk via routes that benefit from existing public walkways: Colden Common Primary School, Colden Common Surgery, a Co-Operative foodstore, and the Dog & Crook public house. Other services, such as the post office, medical practice, chemist, further public houses and restaurants, and existing areas of open space are also within a 15-minute walk.	<p>Given the emphasis of a 15-minute neighbourhood within the draft Local Plan, and the fundamental emphasis of the Climate Emergency, the fact that Land East of Highbridge Road is well placed to reach a wide range of facilities justifies at least a neutral ('negligible score).</p>				IIA2: travel and air quality	Minor	negative uncertain (-?)	Negligible (0) As demonstrated above, Land East of Highbridge Road is very well positioned to provide a 15-minute neighbourhood within a 15-minute walking range are facilities ranging from retail, health, leisure, religious buildings, schools and employment. The ability to reach these locations by sustainable modes of transport is a positive factor for the Land east of Highbridge Road site and the score should be upgraded accordingly	IIA4: health and wellbeing	Minor	positive (+)	Significant Positive (++) The IIA commentary sets out that Land east of	
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	<p>Highbridge Road is not located in a place which is associated with poor health.</p> <p>The only remotely negative comment is that the site does not contain open space, open country or registered common land. However, it correctly points out that open space is within 300m of the site.</p> <p>The site also lies in the immediate vicinity of the local medical practice.</p> <p>IIA7: services and facilities Minor negative uncertain (-?) Negligible (0) This objective seeks to ensure essential services and facilities and jobs in the District are accessible with the same assessment criteria as Objective 1. For the reasons set out for Objective 1, the score should be upgraded accordingly.</p> <p>IIA8: economy Negligible uncertain (0?) Negligible uncertain (0?) The site is not in existing employment use. This score is therefore not contested.</p> <p>IIA9: biodiversity and geodiversity Significant negative (--) Minor Negative (-) The site is not near any locally designated wildlife sites or Ancient Woodland. The site is in relative proximity to a priority habitat and is within an SSSI Impact Risk Zone. However, an appropriate design would mitigate any adverse effects. The score is adjusted to Minor Negative as a result.</p> <p>IIA10: landscape Minor negative uncertain (-?) Negligible (0) Any future design of the site can respond appropriately to the landscape sensitivities of the site, including ensuring that the western extent of the site is kept free from development to respect the South Downs National Park.</p>	
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	<p>IIA11: historic environment Negligible uncertain (0?) Negligible (0) There are no heritage assets on-site and the land does not fall within (nor is it proximate to) a Conservation Area. Brambridge Park lies on the opposite side of Highbridge Road, and includes the Grade II* listed Brambridge House, which is located approximately 700m from the site. Brambridge Park is also included within the Hampshire Register of Historic Parks and Gardens. The parkland is therefore a non-designated heritage asset. Careful consideration can be given to the setting of the SDNP and Brambridge House through any future design.</p> <p>IIA12: natural resources Significant negative (--) Minor Negative (-) The site comprises agricultural land of varied quality, albeit some of it is categorised within Grades 1 to 3. Likewise, whilst the site falls partly within a 'mineral safeguarding area', there may be potential for incidental extraction associated with a future development. The score should therefore be amended to 'Minor Negative (-1)'. IIA13: water resources Significant negative (--) Negligible (0) Whis the site falls within 'Source Protection Zone 1', this constraint can be addressed through an appropriate drainage strategy.</p> <p>This is not an unusual constraint and there is a high-certainty that it can be addressed. As such, the scoring should be amended to 'Negligible (0)'.</p> <p>IIA14: flood risk Negligible (0) Negligible (0) We agree with this score, as the site is not significantly impacted by flood risk constraints.</p> <p>6.57 As set out in Table 1, Boyer's assessment of Land East of</p>	
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	<p>Highbridge Road against the criteria in the IIA provides a realistic assessment of the site, taking account of information derived from survey data. This indicates that the site should have a more positive score, be considered more favourably by WCC and merits allocation within the emerging Local Plan.</p> <p>6.58 It is therefore recommended that the IIA should re-appraise the site to provide a realistic assessment. In turn, this would demonstrate that the site scores more positively, therefore providing a further justification for the site's allocation.</p> <p>6.59 Noting the preceding comments, the currently proposed approach to 'Colden Common' is not justified, nor consistent with national planning policies and legislation, which require Local Plans to contribute to sustainable development. This is an issue that goes to the heart of the Draft Local Plan and which therefore necessitates revision, in order that the Plan can be made sound.</p>	
<p>ANON-KSAR-N8YM-W</p>	<p>The Land at Fairthorne Grange represents an exciting opportunity to provide high-quality family and affordable homes of the highest environmental standards within a landscape led masterplan.</p> <p>The site forms an extension to North Whiteley, with the benefits of access to the extensive facilities and services that will be provided there, but it also provides an opportunity to create a clear and definitive settlement edge.</p> <p>The draft local plan outlines the importance of Winchester City stating that: 'As the largest settlement in the district and county town, Winchester is an important centre for housing and employment activities. There are significant patterns of commuting due to the mis-match of workers and residents and its strong travel</p>	<p>The responses to the comments on the IIA have been summarised and responded to in Appendix A of the IIA. The full document can be found here.</p>

links to London. It is a hub for many services and facilities which benefit residents and businesses in the district and beyond, and is a sustainable location for growth and change.'

Winchester City Council commissioned LUC in May 2020 to carry out an Integrated Impact Assessment (IIA), and Habitats Regulations Assessment (HRA) of the emerging Winchester District Local Plan. The IIA comprised of a Sustainability Assessment (SA), incorporating Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA).

Appendix F of the IIA presents the detailed site assessment proformas for each of the site options appraised. Page 209 - 2011 concerns the Land at Fairthorne Grange, Curbridge.

Biodiversity and Geodiveristy

Within the Integrated Impact Assessment Report (Appendix F) the site has been assessed (ref: CU01) against a series of objectives. For the category 'Biodiversity and Geodiversity', the site is assessed as 'significant negative' with the following text: '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'.

The Ecological Technical Note prepared by The Environmental Dimension Partnership Ltd (EDP), identified the key ecological constraints and opportunities through a desk-based study and Extended Phase 1 Survey of the Site.

	<p>An Extended Phase 1 Habitat survey of the Site was undertaken by an experienced ecologist on 25 July 2022. During the survey, information was also obtained to undertake a habitat condition assessment, required for preliminary Biodiversity Impact Assessment calculations. In addition to an Extended Phase 1 survey, further detailed assessments were undertaken in relation to bats and badgers to further inform potential ecological constraints in relation to future development of the Site.</p> <p>The Technical Note concluded that there are no significant 'in principle' constraints to any future development of the Site which cannot be avoided through implementation of sensitive design, enabling the retention of sensitive habitats and features. There is also potential for future development to deliver significant enhancements including biodiversity net gain in line with the policy and the retention of sensitive habitats and features, including green open space along the northern boundary to buffer the most valuable habitats such as mature trees, areas of scrub, adjacent woodland and watercourse.</p> <p>In addition, should this Site come forward for development, EDP concluded that opportunities for meaningful landscape scale mitigation could be achieved, in line with existing national and local policy.</p> <p>On balance, it is considered that the development of the Land at Fairthorne Grange would contribute neither positively nor negatively towards the district's biodiversity and geodiversity. The scoring should therefore be amended from significant negative (--) to negligible (0).</p>	
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	<p>Natural resources</p> <p>For the category 'natural resources' the Site is assessed as 'significant negative' with the following text: 'The majority of the site contains greenfield land. A significant proportion of the site (greater than or equal to 25%) is on Grade 1 or Grade 2 agricultural land. Less than 25% of the site is within a Mineral Safeguarding Area.'</p> <p>The vision for Land at Fairthorne Grange comprises a landscape-led masterplan guided by a series of design principles.</p> <p>The proposal sets out to create a strong landscape with a defensible edge that sits alongside the woodland expansion. The landscape corridor will be naturalistic with a focus on habitat creation and biodiversity increase. The vision seeks to reduce any urbanising features, including the creation of a more manicured landscape.</p> <p>The proposal will reinforce a strong built defensible edge of the development extent. Through strengthening the hedgerows and increasing the tree planting to the Shawfords Lake corridor, this will give a 'green' and well vegetated character to the existing landscape gap.</p> <p>In consideration of the above, we consider that the development of the Land at Fairthorne Grange would contribute neither positively or negatively towards the district's natural resources. The scoring should therefore be amended from significant negative (--) to negligible (0).</p>	
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<p style="text-align: center;"><u>ANON- KSAR-N81F- E</u></p>	<p>Winchester City Council commissioned LUC in May 2020 to carry out an Integrated Impact Assessment (IIA), and Habitats Regulations Assessment (HRA) of the emerging Winchester District Local Plan. The IIA comprised of a Sustainability Assessment (SA), incorporating Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA).</p> <p>Appendix F of the IIA presents the detailed site assessment proformas for each of the site options appraised.</p> <p>Natural resources</p> <p>Within the Integrated Impact Assessment report (Appendix F) the site has been assessed (ref: SP01) against a series of objectives. For the category 'natural resources, the site is assessed as 'significant negative' with the following text:</p> <p>'The majority of the site contains greenfield land. A significant proportion of the site (>=25%) is on Grade 3 agricultural land or less than 25% of the site is on Grade 1 or 2 agricultural land. Less than 25% of the site is within a Mineral Safeguarding Area'.</p> <p>Whilst the findings of the Integrated Impact Assessment report are noted, it is highlighted that this should not preclude the site being taken forward as an allocation within the draft plan. A landscape appraisal based on the proposed vision for the site has been undertaken to accompany this representation. This outlines that the Land at Salter's Lane is presently arable farmland sloping from approximately 102m AOD in the south to 85m AOD in the north west corner. There is a tree belt along</p>	<p>The responses to the comments on the IIA have been summarised and responded to in Appendix A of the IIA. The full document can be found here.</p>
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	<p>Salters Lane which forms a ridgeline feature that delineates the current western development boundary of Winchester. The site sits in the middle of the parish boundary between Winchester and Sparsholt. There are no landscape designations or public rights of way within the site</p> <p>A zone of theoretical visibility (ZTV), using a LIDAR first return digital surface model at a 1m grid was prepared which extruded development to a height of 9m (2 storey) for the proposed development areas within the Sparsholt area of the site and to 11m to represents 3 storey development within the Winchester area of the site. The visual splay produced was then verified by a site visit carried out in December 2022.</p> <p>It can be confirmed that the ZTV of the proposed development will be very limited and due to both topography and existing vegetation will be contained to between 0.5-1km from the site boundary to the north, south and west across open farmland. Glimpsed, partial views are likely to be afforded from the residential properties along Salters Lane and some properties within Holly Meadows, these will be largely screened by the woodland belt adjacent to Salters Lane. Beyond this area there are some smaller areas of ZTV located within elevated areas of farmland to the west and north. There are no public rights of way within the ZTV meaning that with the exception for the visual receptors listed below, the vast majority is within open farmland and therefore not publicly accessible.</p> <p>The public accessible views will be the partially screened views along Salters Lane and its junction with Holly Meadows, glimpsed partial views above the hedgerow along Dean Lane and short glimpsed views through the woodland belt from</p>	
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vehicular users travelling east along the busy B3049 Stockbridge Road.

The only other publicly accessible views will be from the frontage of residential properties along Deane Down Drove that forms the southern edge of Littleton. However, there is a line of trees and a broken hedgerow along the southern edge of this road which, along with the tree belts lining both sides of the B3049 Stockbridge Road and those along the site's western boundary, mean that views of the proposals will be only partially visible through the intervening vegetation, and even less so during the summer.

The ZTV in this location runs along Dean Down Drove in front of the residential properties and across the north eastern corner of elevated farmland between Dean Down Drove and Main Road.

This north eastern corner of farmland falls within policy CP18 – Settlement Gaps, in the Winchester District Local Plan Part 1, Joint Core Strategy, adopted March 2013. Under this policy it states:

“The Local Planning Authority will retain the generally open and undeveloped nature of the following defined settlement gaps:

...Winchester – Littleton

Within these areas only development that does not physically or visually diminish the gap will be allowed.”

While a small section of the ZTV falls within this settlement gap

the site is located outside of it. The policy clearly states that only development within these areas must not physically or visually diminish the gap in order to be allowed. Therefore, while there will be a degree of partial visibility of the proposals from a small area of the Littleton settlement gap the proposals are not located within it and therefore do not affect this policy.

In regard to mitigating the visual effects on the limited visual receptors we concur with the approach adopted within proposed illustrative masterplan, whereby development is set back from the western, southern and northern edges of the site. This provides the opportunity to plant parkland groups of trees along the built edge of the development as well as within the areas of open space. New native woodland structure planting along the western edge of the site, outside of the powerline easement will also assist in mitigating the visual effects, especially along the south western edge which is the more elevated section on the site. These mitigation measures will assist in breaking up the built form and will assist in integrating the development into the landscape. They will also provide informal recreation and are of a scale that will be capable of delivering biodiversity benefits.

Overall, notwithstanding the site's assessment within the Integrated Impact Assessment Report, it is emphasised that the proposed vision for the site has been directly informed by its setting and location. Furthermore, the landscape appraisal has confirmed that the zone of theoretical visibility of the development will be very limited. In addition, the assessment of the site should be balanced with the potential for landscape and biodiversity improvement and enhancement. This notably includes the addition of new native woodland planting and

	<p>publicly accessible open space to the benefit of the wider community.</p> <p>Biodiversity and Geodiversity</p> <p>For the category 'Biodiversity and Geodiversity', the opportunity at Salters Lane is assessed as 'Significant negative' with the following supporting text: 'Justification: The site is not within an internationally or nationally designated biodiversity site or within a SSSI Impact Risk Zone for 'residential' or 'all planning applications'. It is within 500m of a locally designated wildlife site or ancient woodland. It is within a priority habitat. It is not within 100m of a water course. The site does not intersect with a county or local geological site.'</p> <p>The site has been subject to a suite of ecological survey work undertaken by ECOSA in 2022 comprising a Phase 1 habitat survey, bat activity surveys, hazel dormouse surveys, breeding bird surveys and reptile surveys. The survey work has identified that the site primarily comprises an arable field bounded by hedgerows and a strip of broad-leaved woodland along the eastern boundary of the site. In terms of protected species a low population of slow-worm and an assemblage of breeding birds has been recorded at the site. Any future planning application would be supported by a full Ecological Impact Assessment quantifying potential impacts and mitigation and compensation required. However, no overriding ecological constraints have been identified from the work undertaken which could not be addressed through the planning process and scheme design.</p>	
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	<p>The LUC Integrated Impact Assessment Report has identified that the site is within 500m of a locally designated wildlife site or ancient woodland and intersects with a Priority Habitat which together has identified the site as “Significant Negative” under IIA9: Biodiversity and Geodiversity. The locally designated wildlife site within 500m is Weeke Down Covered Reservoir SINC approximately 400m to the south. This is privately owned with no residential access and no other pathways of impact are present between the site and the SINC. Therefore, this is not considered to present a constraint to potential development. The Priority Habitat present is the woodland situated on the eastern boundary of the site. Any risks to this habitat can be mitigated within the scheme through the inclusion of an appropriate buffer and the inclusion of suitable landscaping on site has the potential to contribute to an increase in connectivity from this habitat to the surrounding area. It is considered on the whole that the site would be a suitable location for development in ecological terms and appropriate scheme design would result in a delivery of an overall enhancement at the site over the baseline situation.</p> <p>Accordingly, the ‘Significant negative’ assessment is considered to represent a distorted view of the Biodiversity and Geodiversity potential of the site. This assessment does not take into account the potential for overall enhancement over the baseline situation were the proposed vision for the site to come forward.</p>	
<p><u>ANON-KSAR-NKKF-U</u></p>	<p>Additional material supplied</p> <p>Integrated Impact Assessment 2022</p> <p>3.15 We understand the Council’s Integrated Impact Assessment has taken forward those sites considered</p>	<p>The responses to the comments on the IIA have been summarised and responded to in Appendix A of the IIA. The full document can be found <u>here</u>.</p>

deliverable/developable and undertaken a more detailed appraisal. When considering OT03 Land east of Main Road, against OT08 Land off Cranbourne Drive the inconsistencies noted from the SHELAA are again apparent, particularly in considering heritage and landscape impact.

Figure 6. Integrated Assessment: OT03: Land east of Main Road

3.16 Given the constraints at Land east of Main Road, particularly regarding potential landscape and heritage impacts it is again unclear how the site received certain rankings. For both Landscape (IIA10) and Historic Environment (IIA11) Land off Main Road received a negligible uncertain (0?) ranking. It would just take a high-level desktop assessment to show that this is inaccurate and that the site should have been recorded as amber “minor negative (-)” for both.

3.17 When considering the justification behind the green ranking in relation to heritage, this refers back to the SHELAA record with the justification simply being that it was rated green for effects on heritage assets in the SHELAA. This does not appear to be a particularly strong justification, or particularly clear evidence to suitably test alternatives.

Figure 7. Integrated Assessment - OT08: Cranbourne Drive

3.18 In comparison, Land off Cranbourne Drive is recorded as minor negative uncertain (-?) for landscape (a ranking not included in the methodology as looks to combine minor negative with uncertain?). It is unclear how this can be justified given the site’s contained nature, both physically and visually.

This is made more unclear and less robust given the ranking attached to Land east of Main Road which our own assessment suggests (alongside the Council's previous reasons for refusal) could have the potential to significantly impact the landscape character and rural setting of the village.

3.19 This point has been reiterated by our own supporting landscape consultants Tyler Grange who, on conducting a Comparative Landscape and Visual Analysis of those SHELAA sites in Otterbourne, could find no reasons why sites OT03 and OT04 were assessed as being preferable to OT08 in landscape terms.

3.20 Finally, in considering health and wellbeing the assessment records OT03 as being of minor benefit; although in reviewing the criteria behind this score it is unclear what this minor benefit relates to; how the weighting has been attributed is unclear, and our own view based on the justification would record OT08 as negligible (0?) in this regard.

3.21 With these amended results Land off Cranbourne Drive, would clearly be shown to be the lesser constrained site and therefore more suitable for housing allocation.

3.22 Indeed, the Council's later Development Strategy and Site Selection 2022 document, which includes initial technical appraisals in Appendix 3 (technical assessments were only done on chosen options), this highlights the site could have a high impact on visual sensitivity and a medium impact on both landscape character sensitivity and value. It is considered that this level of assessment would have been useful as part of the Integrated Assessment to consider alternatives more robustly.

<p>BHLF-KSAR-N871-Y</p>	<p>5.0 Integrated Impact Assessment</p> <p>5.1 An Integrated Impact Assessment (IIA) has been published with the Draft Local Plan and it is agreed that this is a useful tool as one part of the site selection process. However, to be effective, the objectives must consider a range of effects to be assessed through appropriate criteria. It is also helpful if they provide sufficient differentiation so that alternatives can be considered.</p> <p>5.2 Bargate Homes object to the blanket approach applied to objectives IIA1 (climate change and mitigation), IIA2 (travel and air quality) and IIA7 (services and facilities) at Appendix F (November 2022) of the IIA. Although inter-related, by using the same assessment criteria for all three, the full range of issues affecting each objective are not considered. This also means that the results are the same across all three, making it harder to differentiate between sites.</p> <p>5.3 Instead, it is proposed that the criteria for each objective should be reviewed. Although it is acknowledged that sites will be allocated through the Neighbourhood Plan, the findings of the IIA will inform those allocations. If the criteria do not reflect the full range of issues which impact on the objective, the allocations may not be justified. For example, if the development of a site would result in significant tree loss, it would affect climate change mitigation (IIA1) but not services and facilities (IIA7).</p> <p>5.4 In addition, the criteria do not reflect any positive benefits which may be brought about through the development, for example improved access to open space or a cycleway. This should also be reflected in the criteria.</p>	<p>The responses to the comments on the IIA have been summarised and responded to in Appendix A of the IIA. The full document can be found here.</p>
<p>BHLF-KSAR-N87Q-Y</p>	<p>5.0 Integrated Impact Assessment</p> <p>5.1 An Integrated Impact Assessment (IIA) has been published</p>	<p>The responses to the comments on the IIA have been summarised and responded to in</p>

	<p>with the Draft Local Plan and it is agreed that this is a useful tool as one part of the site selection process. However, to be effective, the objectives must consider a range of effects to be assessed through appropriate criteria. It is also helpful if they provide sufficient differentiation so that alternatives can be considered.</p> <p>5.2 Bargate Homes object to the blanket approach applied to objectives IIA1 (climate change and mitigation), IIA2 (travel and air quality) and IIA7 (services and facilities) at Appendix F (November 2022) of the IIA. Although inter-related, by using the same assessment criteria for all three, the full range of issues affecting each objective are not considered. This also means that the results are the same across all three, making it harder to differentiate between sites.</p> <p>5.3 Bargate Homes are promoting a site adjacent to Mill House, Coppice Hill (reference BW11). The site is assessed as having a minor negative effect on IIA1, IIA2 and IIA7. The allocated site at Rareridge Lane (BW17) is assessed as having a minor positive effect on IIA1, IIA2 and IIA7. The single difference is the proximity of the primary school, which is closer to BW17 and as a result this one criterion has had the same effect on all three objectives. In practice, both sites are within walking distance of the primary school: 6 minutes for the allocated site and 13 minutes for land adjacent Mill House, demonstrating that they are both in sustainable locations.</p> <p>5.4 Instead, it is proposed that the criteria for each objective should be reviewed. For example, the development of Rareridge Lane will result in significant tree loss, whereas development of Mill House will result in limited tree loss. This has a significant effect on the IIA1 (climate change mitigation) but no effect on services and facilities (IIA7), yet it is not</p>	<p>Appendix A of the IIA. The full document can be found here.</p>
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	<p>reflected in the criteria for IIA1. If it were, BW11 would “score” more highly than BW17. Additionally, Bargate Homes are a Hampshire based housebuilder, employing local people in their office and on site. Again, this will have a positive effect on IIA1 and IIA2 but less of an effect on IIA7 and should be reflected in the criteria.</p> <p>5.5 To summarise, Bargate Homes object to the criteria used to assess the effects of a proposal on climate change mitigation (IIA1), travel and air quality (IIA2) and services and facilities (IIA7). The criteria should be reviewed so that the criteria fully consider the range of issues which lead to an effect, providing differentiation between the objectives. This will provide a more justified and robust assessment which can be used to fully assess alternatives before allocating sites.</p> <p>5.6 With regard to the historic environment (IIA11), it is noted that BW11 is assessed as having a minor negative uncertain effect as the site is rated “amber” for risk of effects on heritage assets. However, this Land adjacent Mill House, Coppice Hill, Bishops Waltham Bargate Homes Ltd is not considered a constraint to development as mitigation will be proposed at the detailed design progresses.</p>	
<p><u>BHLF-KSAR-N8ZW-8</u></p>	<p>19. However, the Integrated Impact Assessment does not appear to test a strategy that goes beyond what is being proposed in the consultation document. Option 1A tests an option that delivers an additional 2,000 homes but states in 4.117 that it the Council expects the Partnership for South Hampshire Strategy to identify and deal with unmet need for housing. Whilst the PfSH provides welcome coordination on such matters it is still the responsibility for the Council’s in this area to plan for unmet needs through the preparation of their local plans. Indeed, this is the only mechanism unless a joint local plan is being prepared that will take on this responsibility.</p>	<p>The responses to the comments on the IIA have been summarised and responded to in Appendix A of the IIA. The full document can be found <u>here</u>.</p>

	<p>The Council must therefore examine strategies that contribute more towards the unmet needs of other areas and allocate a carbon neutral site for residential development in the next iteration of the local plan.</p> <p>20. It will also be necessary for the Council to set out which council areas are to benefit from the additional homes being planned for by Winchester. This will ensure that there is clarity as to the area that will benefit from these homes and the council areas where unmet needs remain.</p>	
<p>BHLF-KSAR-N8ZM-X</p>	<p>Integrated Impact Assessment</p> <p>5.1 An Integrated Impact Assessment (IIA) has been published with the Draft Local Plan and it is agreed that this is a useful tool as one part of the site selection process. However, to be effective, the objectives must consider a range of effects to be assessed through appropriate criteria. It is also helpful if they provide sufficient differentiation so that alternatives can be considered.</p> <p>5.2 We object to the blanket approach applied to objectives IIA1 (climate change and mitigation), IIA2 (travel and air quality) and IIA7 (services and facilities) at Appendix F (November 2022) of the IIA. Although interrelated, by using the same assessment criteria for all three, the full range of issues affecting each objective are not considered. This also means that the results are the same across all three, making it harder to differentiate between sites.</p> <p>5.3 We also object to the assessment of the site against objectives IIA1, 2 and 7. The assessment at All1 states that the site is not within 2,000 metres of a secondary school when in fact it is adjacent to Swanmore College, a school for 11-16 year olds. As the assessment for objective IIA1 has been automatically transferred to objectives IIA2 and IIA7, it means that all three objectives have been assessed incorrectly. The</p>	<p>The responses to the comments on the IIA have been summarised and responded to in Appendix A of the IIA. The full document can be found here.</p>

	<p>assessment should be amended for each and the sustainability benefits of a secondary school should be reflected in the relevant objectives.</p>	
<p>BHLF-KSAR-N8BQ-A Historic Environment Link here</p>	<p>page 24 para 2.14 Comment An approach of assessing impact on heritage significance based on proximity to heritage assets is not ideal and, if used, can only be a starting point within such an assessment. In our response to the scoping report, we argued against the use of purely distance-based measures and reinforced this concern in early 2022 when consulted on draft site assessment criteria. Based on our limited review of the IIA, it is unclear (e.g. from referring to Appendix A, p10) the extent to which these comments have been taken on board. Exemplifying this, page 41 of the IIA states that “The Council’s site assessment work relating to the historic environment began by determining whether historic environment features were present within or adjacent to the site boundary.” If one takes adjacent to mean “within 10m” (as in paragraph 4.270 on page 219), that would result in incomplete consideration of potential impacts on the setting of heritage assets. Greater clarity on the Council’s evidence base on the historic environment would help to bring additional clarity to the matter. Page 62 Para 3.54 Comment We suggest inclusion within the main report of all relevant heritage PPPs that are listed in Appendix C. While such a list could be very long, the list provided in para 3.54 is too short and would present a very narrow perspective on relevant PPPs Page 571</p>	<p>The responses to the comments on the IIA have been summarised and responded to in Appendix A of the IIA. The full document can be found here.</p>

	<p>Proposed monitoring indicators</p> <p>Comment</p> <p>We advise referring to “entries” or “assets” on the Heritage at Risk Register. This is especially important given there are currently 8 conservation areas on the register in the Winchester district</p> <p>We assume the 3rd bullet should read “Number of planning applications within Conservation Areas approved/refused.”</p> <p>Page 578</p> <p>Para 8.9 / 8.10</p> <p>Comment</p> <p>Concluding remarks are given associated with IIA objectives 1-9. Are concluding remarks intended also for IIA objectives 10-14? If we have missed those, please advise.</p>	
<p>BHLF-KSAR-N8BS-C</p>	<p>Winchester Council commissioned LUC (2020) to complete an Integrated Impact Assessment (IIA), and Habitat Regulations Assessment (HRA) in relation to the emerging Local Plan. The IIA comprised of a Sustainability Appraisal and within this it details Site Assessment Criteria.</p> <p>Appendix F of the IIA provides a detailed assessment proformas for the various site options appraised.</p> <p>Knight Frank have critiqued the assessment and re-appraised site options within Kings Worthy (Appendix 3).</p> <p>The Knight Frank assessment adopts a balanced approach and reasoned justification for adjusting scores accordingly. Importantly, Knight Frank attended the Kings Worthy Parish Council consultation event on the 18th May. This presented the various options and invited views via formal feedback forms. The Parish consultation concluded 22nd May. Immediately after the consultation event had concluded a meeting was subsequently convened by the Parish Council and the Councillors shortlisted their preferred sites (30th May 2022).</p>	<p>The responses to the comments on the IIA have been summarised and responded to in Appendix A of the IIA. The full document can be found here.</p>

	<p>Knight Frank requested to meet with Parish Councillors to discuss proposals and present the BSP vision in relation to land east of Lovedon Lane given concerns in relation to site selection.</p> <p>The Parish Council declined to meet, and a separate request was also made to meet with officers at Winchester City Council. The City Council also declined to meet and qualified that they were not arranging meetings with site promoters due to capacity issues. Correspondence from Steve Opacic (Appendix 4) confirmed that officers were in the process of considering Parish Council feedback and would be in contact with site promoters where officers felt certain sites may warrant a site allocation. The correspondence proceeded to confirm that if we did not hear from officers within the next month or two that they would not be planning to allocate the site.</p> <p>The approach Winchester City Council have adopted in relation to site selection is questionable. The council are relying on sites selected by the Parish Council. However, in selecting preferred sites the Council failed to provide the Parish Council with the site assessment criteria detailed within the IIA. This has been confirmed within subsequent correspondence (Appendix 5). We therefore call into question the credibility of the IIA against SA regulations and would invite the Council to review and update the scoring of KW01: Land east of Lovedon Lane.</p> <p>The Knight Frank assessment concludes that land east of Lovedon Lane is the most suitable site for residential development when measured against the IIA site assessment criteria given its ability to:</p> <ul style="list-style-type: none">- Deliver a PassivHaus development- Achieve a high standard of energy efficiency- Ability to increase the proportion of energy produced from	
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	<p>renewable and low carbon sources</p> <ul style="list-style-type: none"> - Enhance active travel and improve efficiency of existing bus route to reduce carbon emissions - A mixed use proposal with significant area of public open space to create a healthy and self-sustaining development - Integration of green and blue infrastructure (positive contribution to help mitigate climate change) - Additional Public Open Space to integrate existing and new community, enhancing ecological network and green infrastructure - The development will provide a mix of house types, tenures and affordable housing (up to 60 affordable homes). - Within 15 minutes from Winchester via public transport and exceptionally well related to services, facilities and high paid employment which helps reduce deprivation and improve health - The proposals include 1,000 GIA of commercial space which will support economic needs of local community, contributing towards the low carbon economy and reducing need to travel - The site will exceed 10% biodiversity net gain and enhance habitat connectivity. - The proposal will enhance and extend the existing Green Gap - The site will have no impact upon heritage assets and will help reduce pressures for increased densities in urban areas where in-direct impact on heritage is more likely - Located within SSSI impact zone however SuDS and water recycling will improve and minimise development impacts arising from surface water run-off 	
BHLF-KSAR-N864-1	<p>Wates has reviewed the supporting Integrated Impact Assessment (IIA) for the Local Plan and is concerned that</p>	<p>The responses to the comments on the IIA have been summarised and responded to in</p>

	<p>there is a lack of consistency between the SHELAA site assessments and those in the IIA.</p> <p>7.8 Moreover, Wates' view is that many of the sustainability challenges identified in the IIA are either overstated, entirely manageable or mitigatable, or have not been appropriately balanced with the benefits of development.</p> <p>7.9 IIA1: climate change mitigation: It is accepted that greenfield development options are unlikely to 'score' in a very positive way when considering climate change mitigation or adaptation. However, the approach to development, the inclusion of modern construction techniques, and the choice of materials will make a difference as will the layout of development which will consider the orientation of buildings and the inclusion of open space and a biodiversity net gain.</p> <p>7.10 IIA2: travel and air quality: Given the urban edge location of Pudding Farm, it is accepted that the development site option could bring additional traffic to already used roads, where air quality might not be at its best, even if not AQMA. However, the accessibility of the site to public transport, and the significant opportunities for pedestrian bicycle connectivity must be balanced with the potential negative effects.</p> <p>7.11 IIA4: health and wellbeing: Development site options at Pudding Farm will include access to the countryside, and significant open space / a country park, therefore a 'negligible' score here is questioned.</p> <p>7.12 IIA7: services and facilities: It is disappointing to see a 'minor negative' assessment for this criterion. Pudding Farm is readily accessible by sustainable means to a range of services and facilities in Winchester.</p> <p>7.13 IIA8: economy: It is difficult to understand this assessment as 'negligible.' Whilst the site is unlikely to provide long term employment, part of the justification for urban edge</p>	<p>Appendix A of the IIA. The full document can be found here.</p>
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	<p>development is to support the continued vitality and vibrancy of town and city centres.</p> <p>Pudding Farm with its sustainable access to Winchester centre will provide direct economic benefits to the city.</p> <p>7.14 IIA9: biodiversity and geodiversity: There is a tension here, where the assessment in the IIA is a “significant negative” but the SHELAA assessed all biodiversity matters as ‘green.’ Wates tends towards the latter assessment, as it has demonstrated through these submissions and the associated Vision Document – biodiversity will be managed, and a net gain achieved.</p> <p>7.15 IIA10: landscape: it is accepted that the current policy position for Pudding Farm is that it would close a ‘gap’ between Winchester and Headbourne Worthy, however Wates can demonstrate how this gap can be reinforced and properly protected – alongside some residential development – in the Vision Document for the site.</p> <p>7.16 IIA11: historic environment: Wates agrees with the ‘negligible’ assessment here, as no heritage assets will be significantly affected.</p> <p>7.17 IIA12: natural resources: Wates notes the same tension here between the IIA and the SHELAA assessment as for biodiversity. Consistency is called for, and Wates commends its evidence to the Council on these matters.</p> <p>7.18 IIA13: water resources: The challenges of water management in the area is noted by Wates, and is also noted as a general challenge to development, not necessarily a site specific matter.</p> <p>7.19 IIA14: flood risk: Wates agrees with the ‘negligible’ assessment here, as the site is entirely in Flood Zone 1</p> <p>7.20 Having reviewed the IIA; Pudding Farm, Worthy Road would appear to be appropriate to allocate for development.</p>	
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	<p>None of the constraints to development are insurmountable, and in fact, much of the assessment supports the sites as suitable and sustainable for development.</p> <p>7.21 The vision document at Appendix 2 of these submissions clearly demonstrates how development can be sustainably delivered at Pudding Farm, Worthy Road, and it is respectfully requested that it is allocated in the Local Plan.</p>	
<p>ANON-KSAR-NKA2-W</p>	<p>Chapter 4 and Table 4.3</p> <p>I support the exclusion of CS6, CS10-14 from the allocations on the basis of</p> <ul style="list-style-type: none"> - lack of local infrastructure, single track privately owned roads - inadequate sight line on access roads - valued landscape of the area (see Compton Down LADS) - prime agricultural nature of the land direct run off to an Itchen tributary (mineral sensitivity) - lack of local employment 	<p>Support noted and welcomed.</p> <p>Recommended response: No change</p>
<p>ANON-KSAR-N8GS-H</p>	<p>The Development Strategy and Site Selection 2022 paper does not identify any new allocations at Waltham Chase, which is reflected in the Regulation 18 Local Plan 2039 whereby the current, adopted Local Plan allocation at Morgan’s Yard is carried forward (WC1). This is on the basis that “There is a substantial amount of allocated land still to be developed. Therefore given the constraints around this location and it is not considered appropriate to allocate sites for further development at this time, given that the overall level of housing need can be met at other locations.” As set out elsewhere in these representations, it is considered that the level of housing need has been underestimated and there is a need for additional sites to be included for allocation. Accordingly, it is considered appropriate to consider which of the available sites should be considered for that purpose.</p>	<p>The responses to the comments on the IIA have been summarised and responded to in Appendix A of the IIA. The full document can be found here.</p>

	<p>This site at Land at Church Farm, Waltham Chase (SH13) scored favourably to WC1 in its overall score against the 11 objectives within the DSSS/IIA and on that basis there is no reason that it should not be allocated to meet the increased housing and employment need identified elsewhere within these representations. Indeed, upon further scrutiny of the site assessment for SH13, it is clear that it's scoring should be increased, such that it performs more favourably than WC1.</p> <p>While the IIIA is a useful tool as one part of the site selection process, to be effective, the objectives must consider a range of effects to be assessed through appropriate criteria. They should also provide sufficient differentiation so that alternatives can be considered.</p> <p>I object to the blanket approach applied to objectives IIA1 (climate change and mitigation), IIA2 (travel and air quality) and IIA7 (services and facilities) at Appendix F (November 2022) of the IIA. Although inter-related, by using the same assessment criteria for all three, the full range of issues affecting each objective are not considered. This also means that the results are the same across all three, making it harder to differentiate between sites. It is proposed that the criteria for each objective should be reviewed. This will provide a more justified and robust assessment which can be used to fully assess alternatives before allocating sites.</p> <p>In addition, of particular concern, the site has scored "significant negative" for IIA9 (biodiversity and geodiversity) and IIA12 (natural resources), but the outcome of the scoring criteria used by the Council do not appear to justify this.</p>	
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	<p>At present, the Council’s evidence base and its justification in the assessment of sites is somewhat lacking. It is therefore not currently possible to understand how the Council has arrived at its conclusions for each sustainability objective. The Council’s approach to assessing and allocating sites for development is currently not justified and is ultimately not sound, contrary to paragraph 35 of the NPPF, and therefore needs to be reviewed and supplemented by further evidence.</p>	
<p>BHLF-KSAR-N86A-E</p>	<p>MCC has reviewed the supporting Integrated Impact Assessment (IIA) for the Local Plan and is concerned that there is a lack of consistency between the SHELAA site assessments and those in the IIA.</p> <p>6.7 Moreover, MCC’s view is that many of the sustainability challenges identified in the IIA are either overstated, entirely manageable or mitigatable, or have not been appropriately balanced with the benefits of development.</p> <p>6.8 IIA1: climate change mitigation: It is accepted that greenfield development options are unlikely to ‘score’ in a very positive way when considering climate change mitigation or adaptation. However, the approach to development, the inclusion of modern construction techniques, and the choice of materials will make a difference as will the layout of development which will consider the orientation of buildings and the inclusion of open space and a biodiversity net gain.</p> <p>6.9 IIA2: travel and air quality: As a more rural development option than at Winchester for example, development at New Alresford is unlikely to achieve a strong positive score for ‘travel,’ but there is a significant range of services and facilities in the town, and access to these is achievable by sustainable methods. The Council could consider a weighted response to this criterion, which places sites at Market Towns in a different assessment to those close to</p>	<p>The responses to the comments on the IIA have been summarised and responded to in Appendix A of the IIA. The full document can be found here.</p>

	<p>urban centres, because the need for homes will not be met all at the edge of urban areas, and there is a need to support local town and village communities – their social needs, and the continued viability of rural businesses – which should be balanced with the need to travel.</p> <p>6.10 IIA4: health and wellbeing: Development site options in more rural settings are likely to have access to the countryside, and open space so a positive score here is supported.</p> <p>6.11 IIA7: services and facilities: It is disappointing to see a ‘minor negative’ assessment for this criterion. Whilst New Alresford is not a major urban centre, like Winchester, it is a ‘second tier’ market town with a good level of services and facilities. It might be more appropriate to assess sites relative to the position of the associated settlement in the hierarchy. In this way, development options would more effectively recognise the value of development in town and village locations which support local community facilities to maintain vitality.</p> <p>6.12 IIA8: economy: It is difficult to understand this assessment as ‘negligible.’ Whilst the site is unlikely to provide long term employment, part of the justification for development in more rural locations, including market towns – as recognised in the NPPF – is to support the local, and rural economy, and smaller town centres. This is to support smaller local enterprise through more users in the local community (an increase in the population) and thus more spending, but also providing the opportunity for people to live closer to where they might work in more rural areas.</p> <p>6.13 IIA9: biodiversity and geodiversity: There is a tension here, where the assessment in the IIA is a “significant negative” but the SHELAA assessed all biodiversity matters as</p>	
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	<p>'green.' MCC tends towards the latter assessment, because it is confident that biodiversity will be managed, and a net gain achieved, in any development.</p> <p>6.14 IIA10: landscape: MCC questions an assessment of the site which concludes that it has a medium or higher overall landscape sensitivity. The site is relatively discrete and limited in scale, and cannot be seen from many public viewpoints. The site has residential development on two side, and there is further residential development to the north, and west of the site. The site is also enclosed by hedges, roads, and slightly further out by the B3047 (Alresford) Road and the A31. MCC is confident that a full landscaping scheme that supports the sites development can be created to manage and mitigate any residual effects.</p> <p>6.15 IIA11: historic environment: MCC agrees with the 'negligible' assessment here, as no heritage assets will be significantly affected.</p> <p>6.16 IIA12: natural resources: MCC notes the same tension here between the IIA and the SHELAA assessment as for biodiversity. Consistency is called for, and MCC seeks clarification regarding minerals safeguarding on the site. Given the need for greenfield development across the district it is also likely that some agricultural land will be lost, so this should not be seen as a total impediment to development.</p> <p>6.17 IIA13: water resources: The challenges of water management in the area is noted by McClaren-Clark, and is also noted as a general challenge to development, not necessarily a site specific matter.</p> <p>6.18 IIA14: flood risk: MCC agrees with the 'negligible' assessment here, as the site is almost entirely in Flood Zone 1.</p>	
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	<p>6.19 Having reviewed the IIA; Land to the rear of Thody's would appear to be appropriate to allocate for development. None of the constraints to development are insurmountable, and in fact, much of the assessment supports the sites as suitable and sustainable for development. It is respectfully requested, therefore, that it is allocated in the Local Plan.</p>	
<p>BHLF-KSAR-N86F-K Natural England Link here</p>	<p>Comments on the Integrated Impact Assessment We are broadly satisfied that the objectives and indicators within the Sustainability Appraisal cover our key interests and welcome the identification of the need to conserve and enhance biodiversity, landscape character, and to reduce pollution. We also welcome the need to minimise the effects of climate change and address the climate emergency. Please see some more specific comments below. IIA Objective 3: To support the District's adaptation to unavoidable climate change Nature-based solutions, as discussed above, form a key component for mitigating and adapting to the impacts of climate change, however there are no ecological indicators suggested under this climate change objective. The enhancement and expansion of the local nature recovery network will be key to help species adapt to the effects of climate change and is key to sustainable development. It would therefore seem appropriate to make reference to biodiversity within IIA Objective 3, with an appropriate indicator(s) for monitoring. Natural England will be happy to advise further on this aspect. IIA Objective 4: To improve public health and wellbeing and reduce health inequalities in the District The health benefits that interaction with the natural environment helps deliver are well documented and there is significant potential for these to be an integral component to</p>	<p>The responses to the comments on the IIA have been summarised and responded to in Appendix A of the IIA. The full document can be found here.</p>

	<p>help manage health inequalities across the District. It would therefore seem appropriate for the decision making questions to ensure that impacts to the existing public rights of way network and accessible natural greenspace are considered as part of the IIA and also detailed within the Indicators.</p> <p>IIA Objective 9: To support the District's biodiversity and geodiversity</p> <p>The IIA outlines the Local Plan policies SP2, H1 and H3 will have a significant negative effect in relation to this IIA objective. It is acknowledged that any negative effects can be avoided/mitigated by the development principles included under local plan policy SP2. It is advised Local Plan Policy requires relevant development to carry out site-level Habitats Regulations Assessments in order to ensure impacts on European sites are suitably addressed.</p> <p>It is advised that the third potential indicator under this objective is amended to read 'Condition of Habitats Sites and SSSIs' to ensure impacts on SPAs/SACs and Ramsar sites are also taken into account.</p> <p>The Indicators should be amended to better reflect how the Plan will deliver sustainable development by avoiding impacts on biodiversity and securing net gain, in line with the 'avoid, mitigate, compensate' decision making hierarchy.</p> <p>It may also be appropriate for the Indicators to reflect how the local plan will achieve the Council's Green Infrastructure Strategy and its commitments climate change, water quality and air quality.</p> <p>It is suggested a further monitoring parameter(s) is included to monitor the implementation of new GI/habitat that can seek to alleviate the pressures of climate change on species and the ecological network whilst also providing other benefits as described further in our advice above, e.g. percentage of new</p>	
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	<p>GI/ extent of priority habitat within the ecological network. It is also suggested that further monitoring parameters are incorporated to ensure impacts on internationally, nationally and locally designated sites are monitored throughout the Plan period, e.g. via the number, extent and condition of sites designated for nature conservation. We would advise the use of a green infrastructure standard as an indicator, such as Natural England’s Accessible Natural Greenspace Standard (ANGSt). Parameters for measuring the implementation of net gain should be introduced, see further above for our advice on net gain monitoring.</p>	
<p>ANON-KSAR-NKGN-Y</p>	<p>I disagree with the Integrated Impact Assessment Categorisations applied to sites CU14, CU34 and CU45. IIA Objective 1, 2 4 & 7 follow a similar methodology for assessment, and the comments below therefore apply to all these objectives.</p> <p>While the distance to the nearest GP (Whiteley Surgery) is around 1,100 metres, this practice is already under severe pressure. It is not adequately meeting the needs of existing residents and I am aware that some new residents of North Whiteley are already being turned away.</p> <p>This will result in additional distances travelled to the next nearest surgery (Brook Lane – 2,500m and Botley – 2,400m) and therefore further negatively impact the environment.</p>	<p>The responses to the comments on the IIA have been summarised and responded to in Appendix A of the IIA. The full document can be found here.</p>
<p>ANON-KSAR-N8UC-E</p>	<p>The Development Strategy and Site Selection 2022 paper does not identify any new allocations at Waltham Chase, which is reflected in the Regulation 18 Local Plan 2039 whereby the current, adopted Local Plan allocation at Morgan’s Yard is carried forward (WC1). This is on the basis that “There is a substantial amount of allocated land still to be developed.</p>	<p>The responses to the comments on the IIA have been summarised and responded to in Appendix A of the IIA. The full document can be found here.</p>

Therefore given the constraints around this location and it is not considered appropriate to allocate sites for further development at this time, given that the overall level of housing need can be met at other locations.” As set out elsewhere in these representations, it is considered that the level of housing need has been underestimated and there is a need for additional sites to be included for allocation. Accordingly, it is considered appropriate to consider which of the available sites should be considered for that purpose.

Bargate Homes’ site at Land at Forest Farm, Waltham Chase (SH09) scored equivalent to WC1 in its overall score against the 11 objectives within the DSSS/IIA and on that basis there is no reason that it should not be allocated to meet the increased housing need identified elsewhere within these representations. Indeed, upon further scrutiny of the site assessment for SH09, it is clear that it’s scoring should be increased, such that it performs more favourably than WC1.

While the IIIA is a useful tool as one part of the site selection process, to be effective, the objectives must consider a range of effects to be assessed through appropriate criteria. They should also provide sufficient differentiation so that alternatives can be considered.

Bargate Homes object to the blanket approach applied to objectives IIA1 (climate change and mitigation), IIA2 (travel and air quality) and IIA7 (services and facilities) at Appendix F (November 2022) of the IIA. Although inter-related, by using the same assessment criteria for all three, the full range of issues affecting each objective are not considered. This also means that the results are the same across all three, making it

	<p>harder to differentiate between sites. It is proposed that the criteria for each objective should be reviewed. This will provide a more justified and robust assessment which can be used to fully assess alternatives before allocating sites.</p> <p>In addition, of particular concern, the site has scored “significant negative” for IIA9 (biodiversity and geodiversity) and IIA12 (natural resources), but the outcome of the scoring criteria used by the Council do not appear to justify this.</p> <p>At present, the Council’s evidence base and its justification in the assessment of sites is somewhat lacking. It is therefore not currently possible to understand how the Council has arrived at its conclusions for each sustainability objective. The Council’s approach to assessing and allocating sites for development is currently not justified and is ultimately not sound, contrary to paragraph 35 of the NPPF, and therefore needs to be reviewed and supplemented by further evidence.</p>	
<p><u>ANON-KSAR-N81S-U</u></p>	<p>The Development Strategy and Site Selection 2022 paper does not identify any new allocations at Waltham Chase, which is reflected in the Regulation 18 Local Plan 2039 whereby the current, adopted Local Plan allocation at Morgan’s Yard is carried forward (WC1). This is on the basis that “There is a substantial amount of allocated land still to be developed. Therefore given the constraints around this location and it is not considered appropriate to allocate sites for further development at this time, given that the overall level of housing need can be met at other locations.” As set out elsewhere in these representations, it is considered that the level of housing need has been underestimated and there is a need for additional sites to be included for allocation. Accordingly, it is considered appropriate to consider which of the available sites</p>	<p>The responses to the comments on the IIA have been summarised and responded to in Appendix A of the IIA. The full document can be found here.</p> <p>ANON-KSAR-N81S-U noted that IIA objectives 1d and 1e only assess distances to town, district and local centres, and omits distances to villages, particularly large villages. It is assumed that criteria 1d and 1e capture the presence of other services and facilities outside of the formal centres. The IIA is informed by the best available data at time of writing, as</p>

<p>should be considered for that purpose.</p> <p>Bargate Homes' site at Land South of Lower Chase Road, Waltham Chase (SH11) scored equivalent to WC1 in its overall score against the 11 objectives within the DSSS/IIA and on that basis there is no reason that it should not be allocated to meet the increased housing need identified elsewhere within these representations. Indeed, upon further scrutiny of the site assessment for SH11, it is clear that it's scoring should be increased, such that it performs more favorably than WC1, as set out below.</p> <p>We note that the site assessment for SH11 within the IIA report (Appendix F, pg's 803-805) scores SH11 as 'minor negative' against IIA objectives 1 (climate change), 2 (travel and air quality) and 7 (access to services/facilities/jobs) and that part of the justification is that the site is "not within 2,000m of a secondary school". The site lies to the east of Waltham Chase and is within 500m of Swanmore College and so this element of the site assessment should be revised to score 'major positive', in recognition of the site's close proximity to this important local facility.</p> <p>Furthermore, the IIA objectives 1d and 1e only assess distances to town, district and local centres. This approach ignores proximity to the centre of Waltham Chase which, as we have set out in our response to the Settlement Hierarchy Review, should be re-instated as a 'larger village' given the range of services and facilities it has to offer. Indeed, paragraph D.60 of the IIA Report Appendices recognises the important role Waltham Chase has to play, stating "Beyond the Winchester Town the eight larger settlements of the District</p>	<p>referenced in Appendix D and Appendix E of the Reg 19 IIA Report.</p> <p>ANON-KSAR-N81S-U also stated that the assessment of site SH11 regarding IIA objectives 1, 2 and 7 omits a secondary school, Swanmore College, which lies within 500m of the site. As part of the site option appraisal work for the Regulation 19 Local Plan, the schools data used (and a number of other datasets, see Chapter 2 of this report) has been updated and used to update the site appraisals.</p>
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(Bishop Waltham, Colden Common, Denmead, Kings Worthy, New Alresford, Swanmore, Waltham Chase and Wickham) provide a focal point for their own communities. They also provide some services for nearby smaller villages.”

The IIA site assessment scoring should be revised to take into account the distance of potential site allocations to larger village centres. In the case of SH11, this site is the closest site to Waltham Chase centre of those identified in the SHELAA, lying approximately 130m from the crossroads at the centre of the village where the convenience store and post office are located. As set out in the Transport Advice Note submitted in support of these representations, pedestrian and vehicular access can be provided through Bargate’s Hawthorn Grove development to the south, linking to the bus stops on Forest Road and services in the village.

Taking all of the account all of the above, the scoring for SH11 against IIA objectives 1, 2 and 7 should be revised so that it scores at least ‘minor positive’ to reflect its location close to both the centre of Waltham Chase and Swanmore College.

The IIA explains that, in scoring sites against IIA objective 8 (supporting the sustainable growth of the district’s economy) effects for all residential sites are uncertain, given that they are based on information provided by site promoters on the call for sites forms as these forms have not always been completed by site promoters to the same level of detail. However, where sites are clearly greenfield (such as SH11) surely the uncertainty can be removed. SH11 should be scored at least ‘negligible’ rather than ‘negligible uncertain’.

We question the approach taken to assessing sites against IIA10 (landscape), which lacks transparency. For example, SH11 is a 4ha site adjoining the settlement policy boundary of Waltham Chase and bounded by existing residential development to the south and west, with hedgerows and trees on its eastern and northern boundaries. It is assessed as 'minor negative uncertain'. SH14 (Raglington Farm, Botley Road, Shedfield) is a 153ha site, remote from any defined settlements on exposed rising land. However, it is assessed as performing better than SH11 in landscape terms, scoring 'negligible uncertain'. The scoring for SH11 should be revised to be 'negligible uncertain' or better.

On the basis of the assessment above, and as summarised in Table 1 below, SH11 can be considered to score well in respect of objectives IIA1 (climate change), IIA2 (reducing the need to travel), IIA4 (health and welling being), and IIA7 (access to services). The site is well located closer to the centre of the village than any other site in the SHELAA and within walking distance of both Swanmore College and St John the Baptist Primary School, meaning it could support the sustainable growth of the economy (IIA8), and has limited ecological value and is visually well contained (IIA9 and IIA10). It has no heritage constraints (IIA11), would be an efficient use of available land close to existing services (IIA12) and has no negative impact on water resources or flood risk (IIA13 and IIA14).

Table 1: Comparison of IIA and Pegasus Group Site Assessment Scoring for SH11

IIA Objective	IIA Scoring
Pegasus Group Scoring	

	<p>IIA1: climate change Minor positive (+)</p> <p>IIA2: travel and air quality Minor positive (+)</p> <p>IIA4: health and wellbeing Minor positive (+)</p> <p>IIA7: services and facilities Minor positive (+)</p> <p>IIA8: economy Negligible (0)</p> <p>IIA9: bio/geodiversity Significant negative (--)</p> <p>IIA10: landscape Negligible uncertain (0?)</p> <p>IIA11: historic environment Negligible uncertain (0?)</p> <p>IIA12: natural resources Significant negative (--)</p> <p>IIA13: water resources Negligible (0)</p> <p>IIA14: flood risk Negligible (0)</p> <p>As such, should further sites be considered necessary to accommodate additional dwellings, SH11 is extremely well positioned to provide those additional housing numbers as a housing allocation within the emerging Plan. Indeed, when Pegasus Group presented our Vision Document for SH11 to Shedfield Parish Council earlier this year, they commented that, should there be a need for allocations in Waltham Chase, they would not object to SH11 being selected.</p>	<p>Minor negative (-)</p> <p>Minor negative (-)</p> <p>Minor positive (+)</p> <p>Minor negative (-)</p> <p>Negligible uncertain (0?)</p> <p>Significant negative (--)</p> <p>Minor negative uncertain (-?)</p> <p>Negligible uncertain (0?)</p> <p>Significant negative (--)</p> <p>Negligible (0)</p> <p>Negligible (0)</p>	
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