

Appendix II - Summary of Responses to SA Consultation: SA Scoping

Section of Scoping Report	Consultee Comments/Responses		Enfusion Comments
Southern Water			
		Following careful examination of the Scoping Report we have concluded that we have no comments to make.	Noted
Portsmouth Water Ltd			
		I confirm that we have no comments to make other than those expressed at our meeting on the 14 th August.	Noted
Natural England			
		We have considered the information provided in the Scoping Report and given particular attention to the likely effects on biodiversity, flora and fauna. We have also considered the likely effects on soil, water and landscape in so far as these are necessary to support biodiversity, flora and fauna and would like to make the following comments. This opinion is based on the information provided by you, and for the avoidance of doubt does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the plan or programme which is the subject of this consultation, and which may have adverse effects on the environment.	Noted
Plans & Programmes Review	A.1.1 – Pg. 4	Sustainable Development and Environmental Policy PPS7 – Sustainable Development in Rural Areas 2004 – reference should also be made to Government Policy on best and most versatile agricultural land within “Objectives,	Noted & Amended

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		Targets and Indicators.”	
	A.1.8 – Pg. 44	Water The implications for the LDF should include maintaining and enhancing the natural habitats and species of the main rivers designated as SAC/SSSI.	Noted & Amended
	A.1.12 – Pg. 64	Communities and Health The implications for the LDF should include recognition of the importance of natural accessible green space in benefiting people's health and quality of life.	Noted & Amended
Proposed SA Framework	Table 6.1 – Pg. 31	Landscape and Soils The SA objective should be “to protect the character and quality of the landscape of Winchester District and to <i>enhance where possible</i> ”, to place greater emphasis on achieving landscape gains where possible.	SA Framework amended accordingly.
		Options/policies should be amended: To include “to protect soil resources and manage in a sustainable way.” “Conserve or enhance <i>the natural beauty</i> of the AONB, National Park, and locally	SA Framework amended accordingly.

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		designated landscapes."	
		With regard to the option/policy to "Prioritise the use of previously developed land to minimise Greenfield development", it should be recognised in the SA that sites will not be targeted for development without prior survey of their biodiversity and recreational potential, so that the impacts of development can be avoided or appropriate mitigation measures incorporated to protect biodiversity resources.	Noted.
		<p>Possible indicators for the protection and management of soil resources are:</p> <ul style="list-style-type: none"> ▪ Change in land use (ha) (e.g. from agriculture or other Greenfield use to housing, industry, minerals, recreation etc), by Agricultural Land Classification grade/soil type so that some measure of loss or change in soil function by area (ha) or volume (cubic metres) can be estimated; ▪ New homes built on previously developed land; ▪ Changes in area of sealed soils (permanent covering of the soil surface with an impermeable material e.g. concrete or tarmac) ▪ Area of current mineral workings covered by restoration and aftercare conditions; and ▪ Number of agreements/ha covered by ELS (could use number of soil management plans as measure also, or HLS resource protection options adopted). 	SA Framework amended accordingly.
Environment Agency			
Plans & Programmes Review		We would suggest the addition of a reference to the policy from the South East Plan, NRM3 on flood risk management.	Noted & Amended
		We would suggest the addition of a reference the Environment Agency's GP3: Groundwater Protection: Policy and Practice which replaces the 1998 Policy and Practice for the Protection of Groundwater. Parts 1 - 4 can be found on our external	Noted & Amended

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		website. Part 4 includes the Policies, while Parts 1 - 3 give more background information on legislation and groundwater in general.	
		This document should also reference Winchester City Councils Contaminated Land Strategy.	Noted. Document contained within the PP Review. Document
SA Scoping Report	3.17 & 5.5 – Pg. 16 & 21	These sections reference the elements of emissions reduction in view of climate change. However reference should be made to the adaptation and avoidance of these effects. For example locating new development in appropriate locations to avoid risks of flooding both now and for the lifetime of development.	Noted. Adaptation incorporated in SA Framework.
		Most relevant for the Winchester City Council area will be the climate change allowances presented in Annex B of PPS25 relating to sensitivities relating to peak rainfall intensities and Peak River flows. A shift in the seasonal pattern of rainfall is expected, with summer and autumn becoming much drier than at present, with the number of rain-days and average intensity of rainfall expected to increase.	This aspect covered by SFRA.
	Table 6.1 – Pg. 29	Water We would suggest that under possible indicators <i>per capita consumption of 105 litres per head per day</i> is added in line with the South East Plan Policy CC4 and NRM1.	Noted – indicator for consumption per household proposed.

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		We are pleased with the content of this table and should be mirrored as mentioned above in the text in sections 3.17 and 5.5. It mentions the adaptation element of spatial planning and flood risk. We would also ask that the principle of avoiding increases in flood risk to people and property through the application of PPS25 Development and Flood Risk.	Noted – referred to in SFRA.
	Table 6.1 – Pg. 30	Waste We would suggest that you consider the Waste Hierarchy and not just recycling.	The elements of the waste hierarchy are covered in the decision-aiding questions (reduction, recovery and recycling within the SA framework). The term 'Waste hierarchy' is less well understood by the public, so has been excluded.
		Climate Change We commend the inclusion of adaptation to climate change within this section. Avoidance of inappropriate development in line with advice offered in PPS25 is equally important. This should ensure that spatial planning uses the correct approach to allocating development accounting for flood risk both today and for the lifetime of this development. The local Strategic Flood Risk Assessments completed by Atkins for the area of your authority within the PUSH sub-region, and Halcrow for the rest of your	SA Objective on water has been amended to include consideration of future flood risk under climate change scenarios.

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		authority area will be important information tools in informing this decision making process.	
		Sustainable Construction We would recommend that the sentence "ensure the incorporation of energy efficiency measures" is amended to read 'ensure the incorporation of energy and water efficiency measures...'	SA Framework amended accordingly.
		Under the indicators section we would suggest it is stated that <i>as a minimum all development should obtain the code for Sustainable Homes Level 3 with regard to water efficiency.</i>	Indicators amended accordingly.
	Table 6.1 – Pg. 31	Biodiversity We would advocate the implementation of green infrastructure.	Agree. Already addressed in Framework, but last bullet point also amended to 'network'.
	Objective 13 – Pg. 31	There should be an indicator to measure the amount of previously developed land bought back into beneficial use.	Indicators amended accordingly.
	Objective 15 – Pg. 32	The indicator only relates to surface water, groundwater should also be considered in this section.	SA Framework Indicator amended to include groundwater quality.
	3.15 –	Please amend <i>there are surface water storage reservoirs in Hampshire</i> . Please add that the River Itchen is designated a Special Area of Conservation under the Habitats	Noted, correction to storage water and

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	Pg. 15	Directive.	identification of the River Itchen as an SAC in this text will be addressed in subsequent SA Reports.
Baseline	B.1.10 – Pg. 38	Rivers Please amend to <i>there are above ground storage reservoirs in Hampshire.</i>	Noted – correction to text will be addressed in SA Report.
Highways Agency			
	Table 6.1 – Pg. 29	The HA support Sustainability Objective 5 'To increase accessibility; reduce car usage and the need to travel', as identified in Table 6.1. Whilst the percentage of passengers who travel on public transport is a good indicator to start measuring this transport objective, we think that additional indicators are added. Many of these indicators build upon the data that you have available as a baseline scenario.	Noted
		Some examples of traffic related indicators which you might consider adding to your SA may include, (but are not limited to): <ul style="list-style-type: none"> ▪ Percentage of people using sustainable modes of travel to work; ▪ Distances people travel to work; ▪ Percentage of out-commuting; ▪ Percentage of in-commuting; ▪ Percentage using sustainable modes for school trips; 	Noted and SA Framework amended.

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		<ul style="list-style-type: none"> ▪ Percentage of development (including dwellings / employment and services) which is served by public transport and cycle / pedestrian routes; ▪ The proportion of new development which is meeting its travel plan objectives; and ▪ Car ownership within Winchester; and ▪ The level of growth of traffic on key A-roads and motorways within Winchester. 	
		The HA would also suggest that parking standards within PPG13 are used as a maximum and where possible levels of car parking less than these should be adopted. It is understood that Winchester are proactively reducing the amount of car parking within the City and as I am sure you are aware, reducing the level of parking reduces the attractiveness of travelling by car.	Agreed. This is an issue for the LDF.
English Heritage			
Proposed SA Framework	Table 6.1 – Pg. 31	Inclusion of 'natural' is a distraction given Objective 11 deals with habitats, species etc.	Important to represent separately.
		The 'built' bit has a home under Objective 14 and the non-historic environment parts of culture are represented within Objective 2 under community needs / infrastructure.	Changed to read cultural-heritage under objective 12.
		Would it be clearer if the 'Heritage' section referred to 'To protect and where appropriate enhance the historic environment' with the first bullet question relocated and the second referring to 'protect and where appropriate enhance and increase access to the historic environment including buildings, areas, features and their settings'.	Agreed. Suggested changes included.
		Depending on how other questions pan out, one might make it clear that this is not just about designated sites, but also includes locally important. If townscape was added to	Townscape issues (buildings and settings)

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		landscape under Objective 13 that might be advantageous.	incorporated into the first decision aiding question for the Heritage Objectives (No 12) SA Framework.
Cala Homes			
		While we generally concur with the report, and in particular with the key sustainability issues identified in section 5, we suggest a slight change of emphasis is required in order to more accurately reflect circumstances in the District.	Agreed, where relevant framework refers to local issues.
Key Sustainability Issues, Problems & Opportunities	5.7 – Pg. 21	<p>Affordable Housing</p> <p>Meeting those housing needs that are not met by the market by the provision of accommodation for rent and shared ownership is identified as a major consideration. The issue is in fact a much broader one of a chronic undersupply of all tenure types, of which the need for affordable housing is but a part. Indeed, it is the under-provision of market housing and the resulting mismatch between supply and demand that has contributed directly to soaring property prices and exacerbated the need for affordable housing.</p>	This is a matter for the LDF as informed by the housing market assessment.
		By its exclusion from the scoping report, market housing would appear to be regarded as unimportant or irrelevant to the promotion of sustainable development, with which we strongly disagree. We would urge the council to take a more holistic and balanced	Noted this is a matter for the LDF.

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		approach to the sustainability appraisal of housing provision.	
	5.8 – Pg. 21	Local Employment The report rightly identifies the level of commuting both in and out of the District as a key issue and suggests this may be addressed by the provision of more local jobs for local people. However, we advocate that there is a reciprocal solution too, namely the provision of more local homes for the existing workforce, many of whom, due to the housing shortage mentioned above, are forced to live well beyond the district and commute ever longer distances to their places of work.	Noted this is a matter for the LDF.
		Balancing housing and employment is a critical part of SA but there are two sides to the equation, and it may be more appropriate to place as much, or more, weight on housing provision as on the local economy. This is particularly the case in Winchester City, which displays an unusually high excess of jobs over local labour supply, where increasing employment further without substantially expanding housing provision will serve only to exacerbate the very imbalance the LDF should be aiming to redress.	Noted this is a matter for the LDF.
Hampshire County Council			
Proposed SA Framework	Table 6.1 – Pg. 31	Potential other indicators for biodiversity could be (a) the loss/gain of Sites of Importance for Nature Conservation and/or (b) % SSSIs in favourable condition.	Amended
Appendix A		Under National sub-heading, should also include Countryside & Rights of Way Act 2000 (CROW) (which includes S.74 Priority Habitats and Species) and the Natural	CROW is contained within the PP Review.

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		Environment and Rural Communities Act 2006, which extends the CROW biodiversity duty to public bodies and statutory undertakers to ensure due regard to the conservation of biodiversity.	Noted & Amended
Appendix B		There is no mention of SINCs in the summary – as Winchester has 500 in its district, this is a considerable contribution to biodiversity in the district and merits a mention along with the other designated sites.	Noted & Amended
Parish Council of Denmead			
		<i>Are there any key policies, plans and programmes missing from the Review?</i> The provision of Affordable Housing needs to be fully integrated within any sustainability survey.	Noted. The provision of Affordable housing is a matter for the LDF.
		Communities become unsustainable if nobody can afford to purchase property locally.	Noted. This is a matter for the LDF.
		<i>Are there any additional key sustainability problems, issues or opportunities relevant to spatial planning and the Winchester district area for which sustainability objectives should be developed?</i> Public transport needs to be provided and fully integrated.	Noted. This is a matter for the LDF.
		It is no use identifying areas as suitable for sustainable development and citing available public transport as a qualifier if you then allow HCC to reduce subsidies	Noted. Not a matter for the Sustainability

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		which lead to the routes being withdrawn later.	Appraisal.
		Large amounts of concrete and tarmac will inevitably lead to flooding issues. Large areas laid to tarmac must be permeable to some degree.	Site level construction and development issues not relevant for the SA Framework/ Scoping report.
		<i>Is there any further information available that could be used to help measure whether sustainability objectives are being progressed?</i> Housing affordability. Integrated Public Transport.	Noted. Affordable housing and transport issues are incorporated in the SA Framework.
		<i>Which targets and indicators are most useful for future measurement of progress towards each sustainability objective?</i> Affordability.	Yes. Included in indicators under housing objective.
Olivers Battery Parish Council			
		Could find no reference to play, sport, recreation or leisure among the key sustainability problems, issues and opportunities discussed. Surely we must recognise that recreation - from children's play, teenage sport, the great variety of adult cultural and leisure activities, to senior age walking, gardening or allotment holding - is a vital part of health and wellbeing for any sustainable community. Almost all leisure activities	Agree. Objective 2 amended to include recreational facilities, also refer to SA

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		require land based facilities which should therefore be factored into the spatial planning system, while many activities are informal which means that provision must also be included in areas which have some other primary purpose, eg. housing.	objective 6.
		It is fair to say that current provision in the Winchester District is not adequate in many areas. Initiatives such as the current WCC District Play Strategy illustrate identified need in one area, while financial pressures to reduce funding for cultural facilities such as the Theatre Royal and the Tower Arts Centre illustrate that trend is towards poorer provision in other areas. It is therefore imperative that a strategy be developed which ensures that land is made available for leisure activities and that most development includes some element of recreational use, whether that be an extended public realm within town centres, enclosed green space within housing developments, increased leisure access to countryside areas, or formal play and sport facilities. Any plan which does include this cannot be truly sustainable.	Agree. New decision-aiding question: Require design that promotes healthy lifestyles and increased physical activity.
Swanmore Parish Council			
		As this will be in stages we will wait until the next stage when the development and defining options will be clearer.	Noted.
Winchester City Council Members			
SA Scoping Report	Table 6.1 – Pg. 27	SA objective building communities - can the decision aiding question that relates to 'reduce social exclusion of disadvantaged groups' - include specific reference to gypsies and travellers	Not amended, may result in the exclusion of other groups.
		SA objective Housing - where we refer to 'provide a range of housing to meet the needs of specific groups (e.g. the elderly, disabled, young).....can gypsies and travellers be included within the list as they obviously have a very specific housing	Agreed. Amended.

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		need?	