



Winchester District Development Framework



Sustainability Appraisal/ Strategic Environmental Assessment



of the



Winchester District Local Plan Part 2 - Development Management and Allocations: Proposed Main Modifications and Additional Modifications



**SA Addendum Report
October 2016**



SUSTAINABILITY APPRAISAL incorporating STRATEGIC ENVIRONMENTAL ASSESSMENT of WINCHESTER DISTRICT COUNCIL'S DEVELOPMENT FRAMEWORK:

Winchester District Local Plan Part 2 – Development Management and Allocations: Proposed Main Modifications and Additional Modifications

SUSTAINABILITY APPRAISAL ADDENDUM REPORT

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Winchester's Local Plan Part 2 (LPP2) – Development Management & Allocations: Proposed Main Modifications and Additional Modifications Sustainability Appraisal (SA) Addendum Report

CONTENTS

1.0	INTRODUCTION & PURPOSE OF THE SA ADDENDUM REPORT	1
	Submission of LPP2 and Examination Consultation Representations on the Submission SA Report (2015) Proposed Modifications to the LPP2 This SA Addendum Report	
2.0	APPRAISAL METHODS	5
	Screening Proposed Main & Additional Modifications (MMs & AMs) for SA Significance Habitats Regulations Assessment (HRA) Screening	
3.0	SA FINDINGS	6
	Screening Modifications for SA Significance Habitats Regulations Assessment	
4.0	CONCLUSIONS AND NEXT STEPS	8
	Table 3.1: Screening Modifications for SA Significance	6
	Appendix I: Summary Responses to Representations on the SA (2016)	10

1.0 INTRODUCTION & PURPOSE OF THE SA ADDENDUM REPORT

Submission of the LPP2 & Examination

- 1.1 The Winchester Local Plan Part 2 (LPP2) Development Management & Allocations was submitted to the Secretary of State on 23 March 2016 for examination, accompanied by various evidence including the SA and HRA Reports (September 2015). The Hearings part of the Examination commenced on 12 July 2016 and concluded on 20 July 2016. The Inspector provided a Note of Initial Findings on 28 July 2016 (IN 004) indicating that he was provisionally satisfied that LPP2 is essentially sound in respect of many elements; the Council was invited to address a number of points including those discussed at the Examination and prepare proposed Main Modifications that should be subject to testing through SA/SEA and HRA and public consultation.
- 1.2 Some matters and issues for the SA were raised and addressed during the Hearings. Any proposed main modifications that might give rise to significant sustainability effects need to be subject to Sustainability Appraisal incorporating Strategic Environmental Assessment (SEA). The purpose of this SA Addendum Report is to:
- explain matters with regard to the SA that have been raised through the examination stages
 - demonstrate how the proposed main and additional modifications have been screened for significance with regard to SA requirements
 - report the refreshed SA
- 1.3 The principle of resolving matters raised through Examination by publication of an SA Addendum Report is established in English Case Law (see *The Rochford Judgment*¹). SA is an iterative and ongoing process that aligns with the iterative plan-making process. There is no requirement to repeat previous appraisal studies and this SA Addendum Report addresses matters and issues arising from the examination and proposed Main and Additional Modifications of the Winchester LPP2. With regard to compliance with legislative and policy requirements, this SA Addendum Report comprises a further part of the SA Report as submitted in September 2015 - and has been prepared in accordance with relevant guidance and legislative requirements.

Consultation Representations on the Submission SA Report (2015)

- 1.4 Representations were made through Hearing Statements submitted to the Examination and included issues raised on the SA Report submitted with the LPP2 in September 2015. Around 22 representations were made and the issues raised are summarised in Appendix I of this SA Addendum Report. Most of the issues raised were associated with matters of clarification and some were discussed at the Hearings; no further action is required.

¹ Cogent Land LLP v Rochford District Council (2012) EWHC 2542

- 1.5 Concern was expressed by several respondents with regard to an error in the SA Report that suggested site 2552 (New Alresford) had been purchased for use as rugby pitches, and associated negative effects for loss of such recreational land for allocated new development. It is now understood that the land has not been purchased for rugby pitches and it was agreed that Table 4.17 in Appendix VI & Appendix VIII of the SA Report should be amended to reflect this. While this may change the nature and significance of the effect for site 2552 against SA Objective 2, it does not significantly affect the overall SA findings or cumulative effects identified for that settlement. Therefore, there is no further action required. There were no comments received on the Submission HRA Report (September 2015).

Proposed Main Modifications & Additional Modifications to LPP2

- 1.6 The Council is now proposing Main and Additional Modifications (MMs & AMs) to LPP2 based on consultation representations, updated evidence, changed Government policy with regard to Gypsies & Travellers, and discussions during Examination.

This SA Addendum Report

- 1.7 The following section 2 summarises the approach and methods applied at this stage of the stage of the SA process. Section 3 summarises the findings of the further SA work; the details of concerns and issues raised on the SA are presented in Appendix I. An overall summary and the next steps are provided in section 4.

2.0 METHODS

Screening Proposed Modifications (MMs & AMs) for SA Significance

- 2.1 Most of the proposed changes to the Winchester LPP2 are minor, concerned with correcting errors, addressing omissions, and providing more clarity. The main changes are associated with the insertion of Policy DM4 on Gypsies & Travellers (MM31) and Policy WC1 with an extension to the site and increasing the number of dwellings from 60 to 100 (MM20). The proposed changes were screened for their significance with regard to SA using professional judgment – do the changes, deletions and additions significantly affect the findings of the SA Report (2015) accompanying the LPP2 Submission and/or do they give rise to significant environmental/sustainability effects?

Habitats Regulations Assessment (HRA) Screening

- 2.2 The increased housing and extension to the boundary for Policy WC1 was considered with regard to any implications for the HRA reported in September 2015 using the previous method and approach.

3.0 SA FINDINGS

Screening Modifications for SA Significance

- 3.1 The proposed Modifications were screened for their significance with regard to SA and the implications for the findings of the SA are set out in the following table 3.1:

Table 3.1: **Screening Modifications for SA Significance**

Policy No: & MM / AM No:	Summary of Changes, Deletions and Additions	Screening - do the changes, deletions and additions significantly affect the findings of the LPP2 SA Report (September 2015) accompanying LPP2 Submission and/or do they give rise to significant environmental effects?
WIN4 MM6	Silver Hill, a mixed use site, includes an additional land use for community/civic uses; additional wording on "high quality" landscape; improve traffic conditions; EIA not now required.	The additional land use will support positive effects for SA objectives on community services/facilities. Requiring high quality landscape & improving traffic will support the positive effects associated with these SA objectives. However, overall these minor changes will not have a significant effect on the findings of the SA Report (Sept 2016).
WIN5 MM8	Additional land use to include "community" facilities as well as leisure/culture.	The additional land use will support positive effects for SA objectives on community services/facilities. However, this minor change will not have a significant effect on the findings of the SA Report (Sept 2016).
WC1 MM20	Land at Morgan's Yard allocated for 60 dwellings – MM allows for about 100 dwellings if the school extension cannot take place on Morgan's Yard. Further wording to provide clarification for the masterplanning requirements, including ensuring no harm to the integrity of the adjoining Waltham Chase Meadows SSSI.	An increase from 60 to 100 dwellings is significant but this is addressed by the provision of additional land to be allocated, if needed. Generally, increased development at this scale may support SA objectives for housing, community services and facilities. There is the potential for an increase in any negative effects from development associated with transport/accessibility and risk of harm to protected and valued environmental assets. However, there are strong mitigation measures in place to mitigate such

		potential negative effects. Overall these minor changes will not have a significant effect on the findings of the SA Report (Sept 2016).
WK1 MM23 & MM24	Clarification with rewording with regard to flood risk management at Wickham.	This will strengthen the mitigation provided through LPP2 Policies to avoid and minimise any potential negative effects with regard to SA objectives for sustainable water management. Overall this minor change will not have a significant effect on the findings of the SA Report (Sept 2016).
WK3 MM26	Minor change site boundary to include access within the site allocation.	No significant effects on the findings of the SA Report (Sept 2016).
DM2 MM28 & MM29	Amendments to reflect Inspector's findings & discussions at Examination – affordable dwellings should meet relevant nationally described space standards in full, and where practical and viable, be constructed to Part M4 Category 2 of the Building Regulations standards.	Changes to reflect national standards – not significant with regard to the findings of the SA Report.
DM4 MM30 & MM31	Reinstatement of Policy DM4 on Gypsies, Travellers & Travelling Showpersons as a result of changes to Government policy and discussions at Examination. Total numbers for 2016-31 are 15 (gypsies & travellers) and 24 (travelling showpeople).	The previous Policy DM4 was subject to SA and the findings are still relevant and valid. Generally, the reinstatement of this Policy will strengthen positive effects for SA objectives on housing and promoting social inclusion; it provides certainty of delivery. Other DM Policies will ensure that any potential effects are mitigated. Overall this minor change will not have a significant effect on the findings of the SA Report (Sept 2016).
AM8-10	Insertion of additional clarifying text "...the preparation of an archaeological assessment will be needed to define the extent and significance of any archaeological remains and reflect these in the proposals, in accordance with Policy DM25 prior to the commencement of development."	Incorporates changes agreed with Historic England & provides consistency across LPP2. This will strengthen the mitigation provided to protect through LPP2 Policies to avoid and minimise any potential negative effects with regard to SA objectives for the historic environment. Overall this minor change will not have a significant effect on the findings of the SA Report (Sept 2016).
AM11	Policy SW1 – additional wording at para 4.6.16 "Development should be avoided within Flood zones 2 and 3." Drainage and sewage	This will strengthen the mitigation provided to protect through LPP2 Policies to avoid and minimise any potential negative effects with regard

	provision should ensure that pollutions to areas of conservation importance...is avoided... "	to SA objectives for sustainable water management and biodiversity. Overall this minor change will not have a significant effect on the findings of the SA Report (Sept 2016).
AM18	Additional wording "...historic parks and gardens/battlefields."	As above for AM 8-10.

- 3.2 Minor amendments of deletions, additions and corrections were made to many of the LPP2 Policies and supporting text and these provide explanation, clarification and enhance guidance for development. These changes are not significant with regard to the SA. Potentially significant MMs and AMs were investigated and it was found that certain positive effects were enhanced; strong mitigation measures are in place through LPP2 DM Policies for any potential negative effects. However, these changes are not significant with regard to the SA – individually or cumulatively.

HRA Updated

- 3.3 Consideration was given to the proposed modifications to the LPP2, with particular consideration of any significant changes to the site allocations. The approach taken was in accordance with available guidance, good practice, and as described in the HRA Report (September 2015) submitted with the LPP2. The HRA concluded that the submission LPP2 would not have adverse effects, alone or in-combination, on the integrity of the identified European sites.
- 3.4 There is only one MM with regard to changes in site allocations that has the potential for significance and HRA - an increase in land allocation for WC1 Land at Morgan's Yard (MM20). However, this is not in proximity to any European protected sites and the conclusion of the HRA Report (September 2015) remains valid.

4.0 SUMMARY & NEXT STEPS

- 4.1 Proposed Modifications have been made to the Winchester LPP2 as a result of updated evidence, concerns raised from consultation, discussion during the examination, and the Inspector's initial findings (IN004). Most changes to the LPP2 are minor, concerned with correcting errors, addressing omissions, and providing more clarity.
- 4.2 The SA screened the proposed Modifications for their significance with regard to the SA process and found that the MMs and AMs are not significant. Overall, the proposed Modifications will confirm positive effects previously identified and the changes will strengthen and confirm implementation of mitigation measures. The HRA process was also updated and concluded that the Proposed Modifications for the LPP2 will not have adverse effects, alone or in-combination, on the integrity of the identified European sites.

- 4.3 The Proposed Modifications to the LPP2 and this accompanying SA Addendum Report will be placed on public consultation through the Council's website. Representations received will be considered and it is expected that the LPP2 will then be adopted early in 2017. An SA Adoption Statement will also be published and this will include reporting how the SA has influenced the plan-making process.

Winchester LPP2 Proposed Main Modifications: SA Addendum Report Summary Responses to Representations on the SA (2016)

Pre-Submission Sustainability Appraisal Report (September 2015)

SA Report Reference	Comment	Response	Action Required
Alresford Professional Group (52012)			
Alternatives	<p>In the first place it fails to address the basic options for development in Alresford. These are either a one site strategy – concentrating most development on Sun Lane - or a dispersed approach as advocated by the APG 'Alternative Plan'. This is a genuine alternative strategy which WCC fail to examine in a systematic and readily understandable manner.</p> <p>Instead it is cursorily addressed in Appendix IX of the SA in an incoherent and inconsistent manner as a 'rebuttal'. The APG views are expanded later in Section 9.</p>	<p>Each reasonable (realistic and deliverable within the scope, timescales and objectives of the Plan) site option was considered against the full SA Framework. The detailed appraisal matrix was provided in Appendix VI with summary findings provided in Section 4 of the SA Report.</p> <p>The SA considered 13 potential site options for the settlement, identified through the SHLAA, and provides a comparative assessment that identifies significant effects for individual sites as well as potential cumulative effects of those sites for the settlement. The approach and method used gives plan makers the ability to consider the potential effects of individual sites as well as different combinations of sites against the SA Framework. Site allocations could potentially be combined (as whole/part sites) in any number of combinations and would be far too numerous to consider and would be completely disproportionate, making it impossible to devise and assess every potential detailed alternative. The NPPF and</p>	No further action required.

SA Report Reference	Comment	Response	Action Required
		<p>NPPG uphold the principles of proportionality.</p> <p>It is also important to note that the SA is an assessment tool that informs decision-making, it is just one part of the Council's site selection process. Other evidence, consultation responses and wider planning judgements also play a role in the Council's decision to progress with either an individual or combination of sites.</p> <p><i>In Ashdown Forest Economic Development LLP v Wealden DC², Sales, J held the choice of alternatives for environmental assessment is a matter of planning judgment and that the planning authority has a substantial area of discretion as to the extent of the inquiries which need to be carried out to identify the reasonable alternatives which should then be examined in greater detail</i></p> <p>Ultimately, as part of the iterative SA process, the alternative approach proposed was considered through the SA process with the findings presented in Appendix VIII of the Pre-Submission SA Report (September 2015).</p>	
Appendix VI	However, even when the WCC – SA explains the sustainability effects of sites they are not presented individually but adopt an inappropriate methodology of reporting at the settlement level. It fails to present the finding in a transparent and readily understandable way for the public to understand and engage in the planning	Noted and disagree. The SEA Directive and Regulations require the likely significant effects of the Plan, including any reasonable alternatives, to be identified, described and evaluated. They are not prescriptive about the approach to take in the assessment or	No further action required.

² [2014] EWHC 406 (Admin)

SA Report Reference	Comment	Response	Action Required
	process.	<p>selection of reasonable alternatives.</p> <p>Each reasonable (realistic and deliverable within the scope, timescales and objectives of the Plan) site option was considered against the full SA Framework. This is explained in paragraphs 2.13 to 2.17 in the SA Report (September 2015). As stated in paragraph 2.13, <i>"Any significant effects relating to individual site options were identified within the appraisal commentary for each of the settlements or 'areas' within Winchester Town, thus satisfying the requirement for reporting the "significant" likely effects in accordance with the SEA Directive"</i>.</p> <p>It is then stated in paragraph 2.14, <i>"The symbols provided in the detailed appraisal matrices relate to the cumulative effect of the potential site options for that settlement or 'area' within Winchester Town rather than for each individual site option"</i>.</p> <p>Detailed appraisal matrices were presented in Appendix VI and summary findings are clearly set out by settlement within Section 4 of the SA Report (September 2015). As required by the SEA Directive and Regulations a Non-Technical Summary was also provided. The summary findings are clearly presented in Section 4, Paragraphs 2.23 to 2.24 and Table 4.5.</p> <p>While every attempt is made to make the SA</p>	

SA Report Reference	Comment	Response	Action Required
		<p>process, including Reports, as accessible and understandable as possible, this can sometimes be difficult given the iterative nature of the process and number of potential site options considered. This was recognised in a recent High Court judgment, where Mr Justice Cransten held that an SA may not necessarily be a simple document and in some cases hard to understand³.</p> <p>The method used meets the requirements of the SEA Directive and Regulations as well as extant guidance and case law. It is considered proportionate for the level of plan-making and gives plan makers the ability to consider the potential effects of individual sites as well as different combinations of sites against the SA Framework. It should be noted that the same method was used to consider reasonable site options through the SA process for the South Worcestershire Development Plan (SWDP). The SA and the Plan were recently found sound through independent Examination and the SWDP adopted in February 2016.</p>	
Appendix VI	Moreover, in the assessment of alternative sites it uses incorrect information and/ or judgements without adequate support from the evidence.	Noted. The SA was carried out by independent consultants and undertaken using professional judgement, supported by the baseline information and wider Local Plan evidence base. Where necessary, references are provided to evidence used to inform the	No further action required.

³ IM Properties Development Ltd v Lichfield DC and Taylor Wimpey UK Ltd and Persimmon Homes Ltd [2015] EWHC 2077 (Admin) (paragraph 48)

SA Report Reference	Comment	Response	Action Required
		<p>nature and significance of effects identified within Appendix VI.</p> <p>Any updated evidence or minor errors/ inconsistencies within the appraisal can be addressed through the iterative and ongoing SA process. It is important to note that these do not significantly affect the findings of the SA overall. The SA informs the Council's site assessment process and decision-making; it is not the sole reason for a decision in terms of which allocations are progressed or rejected.</p> <p>In <i>Cogent Land LLP v Rochford DC</i>⁴ the High Court found that the local planning authority had explained adequately how it had carried out the comparative assessment of competing alternative sites and that any shortcomings in the early process had been resolved by the publication of an SA Addendum Report. The Court of Appeal has recently endorsed the High Court's decision in the <i>Cogent Land</i> case and Singh, J's conclusion on the issue of principle that defects at an earlier stage of the SA/SEA process can, in principle, be cured at a later stage in the plan making process.⁵</p> <p>Please refer to the responses below for the individual comments.</p>	

⁴ *Cogent Land LLP v Rochford DC* [2012] EWHC 2542 (Admin)

⁵ *No Adastral New Town v Suffolk Coastal DC* [2015] EWCA Civ 88, at paras. [48] to [53], per Richards, LJ (delivering the sole judgment in which remainder of the Court agreed)

SA Report Reference	Comment	Response	Action Required
Appendix VI	<p>Under SO2 (VI p71) reference is made to The Avenue site (No 2552) that it is allocated for rugby pitches and unless an alternative site can be found, development for housing '... would lead to major negative effects ...'</p> <p>Comment: This is an error, the rugby pitches have been developed on the site to the north, however, without a correction there is an unsupported negative impact on the site, which appears to have been carried forward to the overall conclusion – see below.</p>	Noted and agree. The appraisal will be amended as part of the iterative and on-going SA process.	Table 4.17, Appendix VI & Appendix VIII will be updated to reflect this. While this may change the nature and significance of the effect for site 2552 against SA Objective 2 it does not significantly affect the overall SA findings or cumulative effects identified for that settlement.
Appendix VI	<p>With regard to the Sun Lane site (No 277) reference is made (WCC – SA VI p 69-70, 73 – 74) to its proximity to the town centre services in respect of SO1 and SO 5.</p> <p>Comment The narrative is confusing and it is unclear what conclusion is brought forward. Sun Lane is a very large site and only its northern end has good access to services, including buses – no regular service uses Sun Lane. This matter is discussed (WCC – SA VI p73), but only minor negative effects for Transport recognised. Public transport access to employment land as well as access to town centre service is as important as access for housing.</p>	<p>Noted. The appraisal recognises that the northern section of site 277 has better access to the town centre and existing settlement.</p> <p>The appraisal states the following against SA Objective 1 on pg. 69, "Greater opportunities exist for the sites within and adjoining the settlement boundary, in particular, the ones closest to the town centre (the northern half of 277, 2533, 2532, 2552, 2534, 2535, 276 and 2123) to have access to existing and could provide additional facilities which would be easily accessible (between 0 - 800 m) to the</p>	No further action required.

SA Report Reference	Comment	Response	Action Required
	<p>Furthermore, the overall effect of increases in traffic caused by the Sun Lane site and its associated proposal for a new junction with the A31 and all that brings are given little weight. The increased congestion, safety and amenity impacts on Sun Lane, Tichborne Down and Nursery Road are glossed over. Accordingly, WCC judgements regarding SO5 and associated SOs (6, 13, 14 & 15) are inadequate.</p>	<p>existing community in New Alresford".</p> <p>The appraisal states the following against SA Objective 5 on pg. 73, "In terms of access to other services and facilities including local employment, shops, healthcare and education facilities, the sites to the North including the northern part of site 277 are within 0 – 800m of most these facilities and development at these sites would lead to minor positive effects this SA objective".</p> <p>It is important to note that the NPPF and NPPG uphold the principles of proportionality and this is a strategic level assessment, not an EIA. Extant guidance (NPPG) states that the SA, "does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan".</p> <p>It is also important to note that accessibility and transport issues have also been considered through the Council's own site assessment process, with transport assessments for each settlement. The SA informs the Council's site assessment process and decision-making; it is not the sole reason for a decision in terms of what allocations are progressed or rejected.</p>	
Appendix VI	<p>In the discussion on SO14 in respect to 'views' the SA acknowledge Sun Lane contains important views but it is judged by WCC to be mitigated by implementation of LPP1 policies.</p>	<p>Opinion noted. The SA notes in Appendix VI that, development on site 277 could be detrimental to New Alresford's landscape character areas of the Bramdean Woodlands.</p>	<p>No further action required.</p>

SA Report Reference	Comment	Response	Action Required
	<p>Comment: <i>There is a self-evident underestimate of the damage the employment development, and more importantly the junction works would have on landscape and views. The planting on the A31 – carried out in the late 80s when the bypass was built - would be completely destroyed leading to long term damage that Alresford would suffer. The junction would almost certainly be illuminated for justifiable highway safety reasons. The noise impact on residents on Sun Lane and neighbouring housing from the traffic on the junction – additional movements, with braking, accelerating and decelerating vehicle would a major negative effect. Moreover, because of the topography little mitigation could be implemented, however, little regard is given to these points.</i></p>	<p>It is considered that there is suitable mitigation available through LPP1 and LPP2 policies as well as at the project level to ensure that these effects will not be of major significance. The SA was informed by the Landscape Sensitivity Appraisal (Nov 2013) produced for New Arlesford. The author of the appraisal has produced a note presented in Appendix 4 of the Council's Matter 9 Hearing Statement (WCC FS 9) that concludes that development at site 2777 is considered appropriate in landscape terms.</p> <p>The promoters' scheme for a grade separated junction would have involved the loss of much of the planting but not all of it; however, they have now agreed a proposal with HCC for a roundabout solution which is likely to have much less of an impact. There is also no reason why mitigation, such as landscaping and planting, cannot be provided as part of the scheme.</p> <p>It is also important to note that the NPPF and NPPG uphold the principles of proportionality and this is a strategic level assessment, not an EIA. Extant guidance (NPPG) states that the SA, "does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan".</p> <p>The SA informs the Council's site assessment process and decision-making; it is not the sole</p>	

SA Report Reference	Comment	Response	Action Required
		reason for a decision in terms of what allocations are progressed or rejected.	
	<p>Finally, in Appendix VI - p 83 reference is made to potential allocation to the east of Alresford within the settlement boundary.</p> <p>Comment: The WCC – SA does not follow this principle with regard to the principal sites, The Dean (2534 7 2535) and Sun Lane (277).</p> <p><i>The Dean sites are in multiple freehold ownerships and tenancies. APG evidence clearly indicates no unified commitment to release the land to enable the land to be developed in accordance with the Plan's proposals ((Winchester LPP2 – NA1; NA2). Indeed there is no evidence submitted by the WCC – SA there is commitment by any of the land owners of occupiers to producing a master plan' as proposed by the Plan. Accordingly, there is doubt that the site is a realistic alternative, especially as public car parking – a low value land use – is proposed. Notwithstanding that, for the purposes of an SA as both sites are relatively small and exhibit similar land use characteristics they could be treated as one unit.</i></p> <p><i>The Sun Lane site is large and the Plan proposes a variety of uses, housing, on the northern end, open land uses in the centre and employment uses in the southern part. The whole development is predicated on a new road junction onto the A31. The site is also large and has a varied topography with north and south slopes and a prominent ridge between. Owing to this variety of existing and potential features there are inevitably a variety of sustainability characteristics. For instance the impact of the A31 regarding noise (SO15) varies from major negative</i></p>	<p>Noted. The comments in relation to the Dean sites are primarily a matter for plan-making.</p> <p>Noted and disagree. The appraisal clearly indicates what areas of the site may be affected by the A31 against SA Objective 15 on Page 82 of Appendix VI. It recommends that a noise and air quality assessment as well as an Environmental Management Plan should accompany any planning application for the Sun Lane site.</p>	No further action required.

SA Report Reference	Comment	Response	Action Required
	<p><i>effect to no effect. While, access to services and public transport (SO1 & 5) varies from a positive effect to major negative effect.</i></p> <p><i>Accordingly any attempt of an overall assessment of the site that fairly reflects this diversity with regard to sustainability effects is meaningless. On the other hand if the site was divided mainly between the north, which would include the housing and open land uses; and the south, including the employment area and associated new A31 access a more meaningful analysis could be carried out. Such an approach is addressed later.</i></p>		
Appendix VI	<p>The WCC – SA Paragraph 4.23 make a major conclusion that the potential allocation to the east of Alresford within the settlement boundary (see above) likely to potentially progress the majority of SA objectives compared to other sites. Indeed this re-iterated in Appendix VI (p 83) - 'The assessment has found that the sites (sic) to the East of New Alresford and within (sic) the settlement boundary are (sic) likely to progress the majority of the SA Objectives compared to other sites.'</p> <p>Comment: <i>The conclusion is not borne out by the WCC – SA own analysis. By de-constructing the narrative analysis in Appendix VI (p69 – 83) APG has been able to construct a main site by site assessment that arrives at a different conclusion. This is discussed in the following paragraphs and illustrated in Appendix 1.</i></p> <p>Alternative SA provided, conclusions are as follows:</p> <ul style="list-style-type: none"> The site at the southern end of Sun Lane is problematical in terms of SOs. In view of this there have to be compelling planning reasons to justify this aspect of LPP2 in relation to Alresford 	<p>Alternative SA noted. A different method has been used and the nature and significance of effects have been added together to give an overall score for sites. The use of overall scores do not provide an accurate reflection of how a site performs against the SA Objectives. For example, a site may perform well with positive effects against the majority of SA Objectives but may have a residual major negative effect on a SSSI or national heritage designation. The sites overall score would be positive, which does not reflect the significance of the effect on biodiversity or heritage. This is why overall scores are avoided and the assessment against the SA Framework should be read as a whole.</p> <p>It is also important to note that the SA is an assessment tool that informs decision-making, it is just one part of the Council's site selection process. Other evidence, consultation responses and wider planning judgements</p>	No further action required.

SA Report Reference	Comment	Response	Action Required
	<ul style="list-style-type: none"> Mixed development proposed for The Dean performs well in terms of the SOs. Of the green field sites The Avenue performs best, with New Farm Road (N) (2553) next and Sun Lane (N) - the housing and open space area only - third. 	also play a role in the Council's decision to progress or reject alternatives. The SA can help to highlight matters to be addressed through plan-making.	
Appendix VI	<p>Given the errors in the WCC – SA, APG submit that it should be reviewed on the following basis:</p> <ul style="list-style-type: none"> The Sun Lane site should be divided between the housing area/ open space and the employment land. It is large and different conclusions exist for the northern and southern areas. The Dean sites combined The errors and misjudgements noted above rectified to provide the basis of an alternative SA. 	Noted and disagree for the reasons set out above.	No further action required.
Appendix IX	Various comments in relation to the reasons for selection of site options in plan-making.	Noted. Appendix IX sets out the reasons for the selection or rejection of reasonable site options in plan-making. It is stated on Pg. 1 of Appendix IX that, <i>"It should be noted that whilst the SA findings are considered by the Council in its selection of options and form part of the evidence supporting the LPP2, the SA findings are not the sole basis for a decision; other factors, including planning and deliverability, play a key role in the decision-making process"</i> .	No further action required.
General	<ol style="list-style-type: none"> The WCC-SA does not meet the legal requirements for sustainability appraisal as derived from the SEA Directive and ruled in the High Court and therefore policies NA2 and NA3 of LPP2 are unlawful. The WCC-SA assessments are not evidence-based and specifically the conclusions on the Sun Lane site (277) do not reflect WCC's information and judgements. The WCC-SA fails to demonstrate how alternative sites are rated and compared. This lack of clarity translates 	<p>Noted and disagree.</p> <ol style="list-style-type: none"> The SA meets the requirements of the SEA Directive and Regulations and is in line with the NPPF as well as extant guidance and case law. The SA is clearly evidence based, with all relevant references provided as footnotes in Appendix VI. 	No further action required.

SA Report Reference	Comment	Response	Action Required
	<p>to an obscure document that fails met good practice for public participation and contrary to the requirements of the Aarhus Convention.</p> <p>4. APG – SA reaches conclusions that differ substantially from that of the WCC – SA – in that:</p> <ul style="list-style-type: none"> • The southern part of the Sun Lane site performs very poorly in that it cumulatively has many more negative effects than other sites. • The Dean, The Avenue and New Farm Road (N) all cumulatively have positive effects. • The northern part of the Sun Lane site cumulatively has neutral effects. 	<p>3. A comparative appraisal narrative for all reasonable site options is provided in Appendix VI. A summary of the findings is provided in Section 4, Paragraphs 4.23 to 4.24 and Table 4.5 in the Pre-Submission SA Report (September 2015).</p> <p>4. Alternative SA has been noted.</p>	
Savills on behalf of Alfred Homes (51580)			
Appendix VI	<p>In February 2014, Savills informed the Local Planning Authority of an error with its emerging SA, and the listing of SHLAA site 2552 as having been purchased for the use of Rugby Pitches.</p> <p>The presence of this error was repeated in the representations made to the City Council in December 2014 to the draft Plan, and yet, the error continues to be made within the Pre- Submission Draft SA despite being informed twice of the need to make the correction.</p>	<p>Noted. As part of the iterative and ongoing SA process the SA will be updated to reflect this comment.</p>	<p>Table 4.17, Appendix VI & Appendix VIII will be updated to reflect this. While this may change the nature and significance of the effect for site 2552 against SA Objective 2 it does not significantly affect the overall SA findings or cumulative effects</p>

SA Report Reference	Comment	Response	Action Required
			identified for that settlement.
Table 4.17 & Appendix VI	<p>The land in question purchased and now used for the provision of Rugby Pitches lies to the north of site 2552. The SA therefore remains inaccurate, and commentary in respect of 'Key Negative Effects' on Page 79 (Table 4.17) in stating that Site 2552 <i>will result in the direct loss of a sports pitch</i>, continues to be an inaccurate statement. The Negative Effects should be updated to remove reference to SHLAA site 2552.</p> <p>This incorrect statement is also repeated within Appendix VIII (P.15), where the SA concludes that Residential or employment development at site option 2552 could hinder the future delivery of the sports pitch with the potential for major long-term negative effects. This is factually incorrect, and therefore undermines the legitimacy of the SA.</p>	Noted. Please see response above.	Table 4.17, Appendix VI & Appendix VIII will be updated to reflect this. While this may change the nature and significance of the effect for site 2552 against SA Objective 2 it does not significantly affect the overall SA findings or cumulative effects identified for that settlement.
Appendix VI	<p>1 Building Communities</p> <p>It is acknowledged by the Council that site 2552 is well located to the Town Centre, with good access to services and facilities. Indeed, of all the site options with the exception of the Dean, site 2552 performs best in this regard.</p>	Noted.	No further action required.
Appendix VI	<p>2. Infrastructure</p> <p>Factually incorrect. The land purchased for the Rugby Pitches lies to the north of site 2552.</p> <p>The delivery of site 2552 would provide for its own open space needs, while also being the closest site to the</p>	Noted. As part of the iterative and ongoing SA process the SA will be updated to reflect this comment.	Table 4.17, Appendix VI & Appendix VIII will be updated to reflect this.

SA Report Reference	Comment	Response	Action Required
	Alresford Recreation Centre and its associated facilities. Far from being a negative therefore, this should have been considered a positive.		While this may change the nature and significance of the effect for site 2552 against SA Objective 2 it does not significantly affect the overall SA findings or cumulative effects identified for that settlement.
Appendix VI	3. Housing For the reasons set out within Chapter 4 of this statement, the proposed strategy for the Dean (Policy NA2) would not provide for all of the policy requirements, given a large proportion of that development is designed for a C2 care facility, and therefore would not contribute towards the 12,500 dwellings listed within Policy CP1 of the Local Plan. Site 2552 would deliver a range of C3 housing units, including affordable housing of varying tenure, and therefore would allow for meeting the objectives of the Local Plan Part 1.	Noted. This is a matter for plan-making. Reasonable options for the overall level of growth were considered through the adopted LPP1 and its accompanying SA process. Please refer to the Housing Background Paper prepared by the Council.	No further action required.
Appendix VI	5. Transport It is true that site 2552 is within this distance to shops and services, but it is not correct for site 277 (Sun Lane). As per the evidence prepared by I-Transport (Section 6 of and Appendix 2), the distance to shops and services exceeds this benchmark set by the SA when accessed via roads with	Noted. The SA notes that the northern half of site 277 is within 800m of the town centre.	No further action required.

SA Report Reference	Comment	Response	Action Required
	a continuous footpath and lighting. In respect of parking, as per the details set out within Chapter 7 of this representation, site 2552 would make provision for a new public car park, linked to that which already exists at the Recreation Centre. This has not been included within the scoring within the SA.		
Appendix VI	11. Biodiversity A Phase 1 Habitat Survey has been undertaken in respect of site 2552, which has shown that the site does not provide habitat for any protected species. There is value within the existing boundary features which would be preserved.	Noted. The appraisal in Appendix VI does not identify any significant effects against SA Objective 11 for site 2552.	No further action required.
Appendix VI	12. Heritage As per the Heritage Assessment submitted at Appendix 1 and summarized within Paragraph 3.12 of this Section, the evidence base that underpins this assessment and the SA conclusion has been questioned. As per the Key Criteria assessment, the SA places great weight on a non-statutory Parks & Gardens designation in assessing the merits of site 2552. Given the importance the City Council, it is of concern that it is not supported by any mapping showing the area within which this designation applies. Furthermore, in order to present a factual position, Heritage Assessment has been commissioned and is appended to this statement, a summary of which follows.	Noted and disagree. The SA does not place great weight on non-statutory Parks and Garden designations. It identifies in Appendix VI that there is the potential for a residual minor negative effect as site 2552 is situated entirely within a Historic Park designated by Hampshire County Council, which is considered appropriate. The Historic Environment Assessment produced by the Council informed the SA.	No further action required
Appendix VI	13. Landscape and soils As per the Landscape Assessment submitted as Appendix 1 to this statement, the land at 2552 does not have the landscape character of historic parkland and the Historic Assessment demonstrates that the site is highly unlikely to contain historic parkland associated with Arlebury Pak. While site reference 2552 has been judged by the Council	Noted. The SA does not identify that there is the potential for significant negative effects on landscape as a result of development at site 2552. The SA was informed by the landscape sensitivity assessment produced by the Council for the settlement.	No further action required.

SA Report Reference	Comment	Response	Action Required
	to be 'moderately sensitive' in landscape terms, it favours the allocation of Sun Lane, of which 51% of the site is considered to be 'most sensitive' in landscape terms.		
Appendix VI	Turning to broader matters concerning the SA, as noted previously it is of concern that the Council has not provided individual site assessments against the SA objectives, resulting in very little comparative evidence of how each site performs against the next. This in our view is a significant failing of the SA, and to some extent may mask the failings of the Sun Lane site under the desire to see a comprehensive site deliver the majority of the development. The SA should have assessed each site individually in order to be transparent.	<p>Noted and disagree. The SEA Directive and Regulations require the likely significant effects of the Plan, including any reasonable alternatives, to be identified, described and evaluated. Neither the legislation nor the extant guidance set out a prescribed method for how the appraisal should be carried out.</p> <p>Each reasonable site option was considered against the full SA Framework. This is explained in paragraphs 2.13 to 2.17 in the SA Report (September 2015). As stated in paragraph 2.13, "Any significant effects relating to individual site options were identified within the appraisal commentary for each of the settlements or 'areas' within Winchester Town, thus satisfying the requirement for reporting the "significant" likely effects in accordance with the SEA Directive".</p> <p>It is then stated in paragraph 2.14, "The symbols provided in the detailed appraisal matrices relate to the cumulative effect of the potential site options for that settlement or 'area' within Winchester Town rather than for each individual site option".</p> <p>The method used meets the requirements of the SEA Directive and Regulations as well as extant guidance and case law. It should be noted that the same method was used to</p>	No further action required.

SA Report Reference	Comment	Response	Action Required
		consider reasonable site options through the SA process for the South Worcestershire Development Plan (SWDP). The SA and the Plan were recently found sound through independent Examination and the SWDP adopted in February 2016.	
General	To conclude, there are many failings with the SA and a lack of evidence to underpin its conclusions, notably heritage analysis, which has lead to a number of flawed judgements within. Of particularly concern is the presence of errors which Savills have advised the City Council many times of, and which remain and materially affect the conclusions of the SA process.	Noted. Please refer to response above.	See above.
Winchester Friends of the Earth (50162)			
General – Air Pollution	The SA (0.27) dismisses air pollution as an issue: 'It is considered that major negative effects on air quality are unlikely as a result of the Local Plan. Policies seek to address the impacts of proposed development on the road network and encourage the use of more sustainable transport modes'. How does any policy within LPP2 do this? 'While there may be some localised impacts in the short term as a result of proposed development, the mitigation proposed through Local Plan policies should ensure that these are not significant'. There is no explanation of how anything in the LP will bring about such mitigation. Certainly the Council has made no demonstrable improvement so far and problems are worsening all the time. Silver Hill, Barton Farm and many other developments will have the effect of increasing traffic and pollution in Winchester and there is nothing in LPP2 to suggest that there are any measures or policies to mitigate.	Noted and disagree. Air pollution is not dismissed as an issue. Paragraph 0.27 is part of the Non-Technical Summary. Further details with regard to the potential effects of the Plan (including policies and preferred sites) on air quality (SA Objective 15), including potential mitigation provided by policies are provided in Section 5, Paragraphs 5.50 to 5.56 of the Pre-Submission SA Report (September 2015).	No further action required.
General	'The Local Plan promotes a park and ride system to	Opinion noted. Park and Ride forms one part	No further

SA Report Reference	Comment	Response	Action Required
	alleviate the pressures on Winchester Town centre'. In fact Park and Ride has not been used for this purpose. P&R can only work towards improving traffic conditions inside towns by removing equivalent amounts of car parking from the centre. The Council knows this and for each new P&R provision the Council has given undertakings (to inquiries and to the Highways Agency) that it would remove equivalent numbers of car parking spaces. It has not done so and it is clear from the LPP2 and other statements of the Council that it does not intend to. Moreover its own developments like Silver Hill will increase car parking in the centre. Also the Council has signally failed to make P&R work, probably because it does not charge enough for the central car parking alternative. Since its new P&R car park in 2010 the intercept of traffic (proportion of inbound traffic intercepted by P&R) has hardly changed. 'This has the potential for long-term positive effects on air quality'. This is a preposterous statement - if the Council wanted it to have an effect on air quality it would have taken the complementary measure of central car park removal.	of the overall transport strategy.	action required.
General	The SA mentions 'combined effects' many times, but LPP2 makes no analysis of the combined effects of all proposed development on traffic and pollution. Table 8.1 'strong policies in support of public transport' - strong policies mean policies capable of making public transport significantly better - what is there proposed in the Local Plan that does this?	Noted. Cumulative effects have been considered throughout the iterative SA process. This includes potential cumulative effects at a settlement level in Appendix VI and cumulative effects for key topics at a Plan level in Section 5, 6 and 8 of the Pre-Submission SA Report (September 2015).	No further action required.
Appendix II	SA Appendix II: 'The HA [Highways Agency] 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	Noted. Winchester Town Access Plan sets out a number of actions to cover these matters and these are monitored on a regular basis – the following is included in Matter 14 The impact of traffic in Winchester Town is frequently	No further action required.

SA Report Reference	Comment	Response	Action Required
	<p>you are aware, reducing the level of parking reduces the attractiveness of travelling by car.' To which the Council response is 'Agreed'. The statement is actually untrue - the Council is proactively increasing the amount of central car parking. It has been doing this all along while it has been telling the Highways Agency the opposite. So it is agreeing to a lie - unsound.</p> <p>The SA consistently talks about traffic congestion in the peak hour 8-9a.m. This is such an unrealistically downplayed observation - parts of Winchester's network now suffers gridlock for several hours in the day.</p>	<p>raised by many representations to LPP2. Air quality, congestion and car parking are all referred to. Para 3.6.5 refers to the Hampshire Transport Plan and Winchester Town Access Plan published in July 2011, which sets out a number of projects and proposals to improve accessibility and air quality, reducing the level of traffic in the city centre and therefore improving the situation in terms of localised congestion. The progress with implementing the Access Plan is reported to the Councils Overview and Scrutiny Committee on a regular basis. The Council has produced both a walking and cycling strategy to facilitate these forms of movement around Winchester, a review of the Car Parking Strategy 2014, has commenced with consultation expected summer 2016.</p> <p>In addition, Hampshire County Council is preparing to undertake a review of the Town Access Plan, in partnership with the Council, which will encompass a review of traffic management and transport provision in the city centre, including air quality and all modes of transport. Drafting of a brief for this work will begin soon and this will define the timescales.</p>	
Bloombridge (51939)			
General	The Sustainability Assessment ("SA") was not undertaken in accordance Section 12 (2)(b) of the Strategic Environmental Assessment Regulations because it did not	Noted and disagree. Each reasonable (realistic and deliverable within the scope, timescales and objectives of the Plan) site	No further action required.

SA Report Reference	Comment	Response	Action Required
	<p>assess reasonable alternatives, including 1871.2 It simply assessed sites rather than options – one option being a smaller site at Church Lane, and another being dispersed growth where housing numbers are shared, for example between 1871/2561 and 275. Overall, the SA appears to have taken an approach that has focused on ‘adequacy’ as opposed to the more aspirational approach required, for example, by paragraph 14 of the NPPF. Sustainable development is meant to be the ‘golden thread’ running through the whole planning process – ‘adequate’ is not enough, especially in the context of the bias that we believe we have now proven (see the letter in Appendix 3). We therefore OBJECT to the SA and request that it is revisited with the explicit objective of allocating the most (or at least genuinely) sustainable housing options for Colden Common.</p>	<p>option was considered against the full SA Framework. The detailed appraisal matrix was provided in Appendix VI with summary findings provided in Section 4 of the SA Report.</p> <p>The SA considered 20 potential site options for the settlement, identified through the SHLAA, and provides a comparative assessment that identifies significant effects for individual sites as well as potential cumulative effects of those sites for the settlement. The approach and method used gives plan makers the ability to consider the potential effects of individual sites as well as different combinations of sites against the SA Framework. Site allocations could potentially be combined (as whole/part sites) in any number of combinations and would be far too numerous to consider and would be completely disproportionate, making it impossible to devise and assess every potential detailed alternative. The NPPF and NPPG uphold the principles of proportionality.</p> <p>It is also important to note that the SA is an assessment tool that informs decision-making, it is just one part of the Council's site selection process. Other evidence, consultation responses and wider planning judgements also play a role in the Council's decision to progress with either an individual or combination of sites.</p> <p><i>In Ashdown Forest Economic Development</i></p>	

SA Report Reference	Comment	Response	Action Required
		<p><i>LLP v Wealden DC</i>⁶, Sales, J held the choice of alternatives for environmental assessment is a matter of planning judgment and that the planning authority has a substantial area of discretion as to the extent of the inquiries which need to be carried out to identify the reasonable alternatives which should then be examined in greater detail.</p> <p>The method used meets the requirements of the SEA Directive and Regulations as well as extant guidance and case law. It is considered proportionate for the level of plan-making and gives plan makers the ability to consider the potential effects of individual sites as well as different combinations of sites against the SA Framework. It should be noted that the same method was used to consider reasonable site options through the SA process for the South Worcestershire Development Plan (SWDP). The SA and the Plan were recently found sound through independent Examination and the SWDP adopted in February 2016.</p>	
Para 4.2 and Appendix II	As a starting point, we note that paragraph 4.2 refers to “ exclusionary criteria ”. We believe the South Downs National Park qualifies as such a criteria and this, therefore, is an overriding criteria in the assessment of possible sites on the west, north and east of Colden Common, and specifically with regard to Sandyfields Nursery (in light of the FOIA disclosures). The SA should apply the ‘precautionary principle’. This, in turn, contributed to the	Noted. Paragraphs 4.1 to 4.8 set out the Council’s site assessment process, including how reasonable alternatives to be subject to SA were identified. The potential effects of reasonable site options on the South Downs National Park is given appropriate consideration through the Council’s own site assessment as well as the SA process, see	No further action required.

⁶ [2014] EWHC 406 (Admin)

SA Report Reference	Comment	Response	Action Required
	<p>flawed SA because many of the 20 sites referred to in paragraph 4.17 could have been excluded from consideration, making a more detailed comparative assessment of the 'reasonable alternatives' even simpler. Table 4.2 (page 46 of the SA) is not simply wrong (eg on the accessibility of 275, the role of the National Park and the landscape sensitivity of 1871/2561), it is too cursory and provides a wholly inadequate basis to assess the sustainability of the various sites (a point picked up by Natural England, among others; see Appendix II, page 11 of the SA).</p> <p>In a similar vein, we note that the response to our comments at page 16 of Appendix II is wrong: the SA has not assessed our smaller option of c45 units at Church Lane (or had regard to the supporting information we submitted, including on landscape and transportation) but, instead, taken a generic view on all of the sites and all of the sustainability objectives which, by definition, is legally flawed because such a wide ranging and untargeted approach cannot enable decisions to be made between 'reasonable alternatives'. For example, there is no basis on which to differentiate the reasoning in support of Site 275 alongside any other reasoning or site. The methodology is fuzzy. It is being used to justify the selection of 275 when, in fact, it could justify any site; leading to flawed and unsound outcomes. Hence the SA fails the legal compliance test because it serves no purpose. The 'pros and cons' of each site have not been set out such that there is no basis in the SA to conclude that 1871 and 2561 are 'inferior in planning terms' – inferior on what basis?</p>	<p>Appendix VI of the Pre-Submission SA Report (September 2015).</p> <p>It is important to note that none of the site options are situated within the National Park and the South Downs National Park Authority have not objected to any allocations proposed in LPP2. Although, it is noted that they did object to aspects of the planning application.</p> <p>Noted and disagree. Please refer to previous response in Appendix II of the Pre-Submission SA Report (September 2015).</p>	
Appendix II	Appendix II of the SA (from page 16) contains further responses to our December 2014 representations. We will	Noted.	No further action required.

SA Report Reference	Comment	Response	Action Required
	<p>not repeat the majority of our criticisms here (as they are largely stated in Appendix II). However, no aspect of Enfusion's response is satisfactory and, indeed, the responses appear misjudged (and plainly wrong) in the context of the information we received in response to our FOIA request: eg the Design Review Panel and the Landscape Officer's objections. These FOIA findings underscore the failings in the Enfusion methodology.</p> <p>The methodology is too generic and has, evidently, failed to identify or test major sustainability concerns (eg site capacity) or the availability of 'reasonable alternatives'. In turn, whether our legal compliance point is accepted or not, the outcome is an unsustainable and unsound proposed allocation of 165 houses at Sandyfields Nursery. Therefore, Policy CC1 of the presubmission plan must be changed. We do not accept the sweeping and unsubstantiated statement at paragraph 4.64 of the SA that, in response to our 2014 representations, "the minor revisions do not significantly affect the nature and significance of the cumulative effects for potential site options identified through the SA in 2014." This statement seems embarrassingly out of touch given the FOIA disclosures.</p>	<p>Noted and disagree. The SEA Directive and Regulations require the likely significant effects of the Plan, including any reasonable alternatives, to be identified, described and evaluated. They are not prescriptive about the approach to take in the assessment and selection of reasonable alternatives.</p> <p>Each reasonable (realistic and deliverable within the scope, timescales and objectives of the Plan) site option was considered against the full SA Framework. This is explained in paragraphs 2.13 to 2.17 in the SA Report (September 2015). As stated in paragraph 2.13, "Any significant effects relating to individual site options were identified within the appraisal commentary for each of the settlements or 'areas' within Winchester Town, thus satisfying the requirement for reporting the "significant" likely effects in accordance with the SEA Directive".</p> <p>It is then stated in paragraph 2.14, "The symbols provided in the detailed appraisal matrices relate to the cumulative effect of the</p>	

SA Report Reference	Comment	Response	Action Required
		<p><i>potential site options for that settlement or 'area' within Winchester Town rather than for each individual site option".</i></p> <p>The method used meets the requirements of the SEA Directive and Regulations as well as extant guidance and case law. It is considered proportionate for the level of plan-making and gives plan makers the ability to consider the potential effects of individual sites as well as different combinations of sites against the SA Framework. It should be noted that the same method was used to consider reasonable site options through the SA process for the South Worcestershire Development Plan (SWDP). The SA and the Plan were recently found sound through independent Examination and the SWDP adopted in February 2016.</p> <p>The approach and method used gives plan makers the ability to consider the potential effects of individual sites as well as different combinations of sites against the SA Framework. Site allocations could potentially be combined (as whole/part sites) in any number of combinations and would be far too numerous to consider and would be completely disproportionate, making it impossible to devise and assess every potential detailed alternative.</p> <p>As per the response in Appendix II, amendments were made to the appraisal</p>	

SA Report Reference	Comment	Response	Action Required
		matrix for Colden Common to reflect representation received. It was considered that they did not significantly affect the findings of the previous SA work when considering the assessment as a whole.	
Appendix VI	On the positive side, except for the facts that (a) the SA has not been updated specifically to address our reduced option of 45 units and (b) the SA and the City Council have not revisited the adequacy of the landscape assessment 2013, Enfusion's work could be taken to confirm that Church Lane is a sustainable option. Indeed, if Enfusion had actually provided a ranked scoring of the main development options for Colden Common then Church Lane, in our opinion, would score higher than any other site. By way of example, we include our comparative analysis of 2494 and 1871/2561 as Appendix 4.	Opinion noted. 'Ranking' of options can often distract from the key sustainability issues identified and not give an accurate reflection of the performance of options against the SA Framework. For example, an option may perform well against the majority of objectives but have the potential for a residual major negative effect on the historic environment. An overall score or rank may not reflect the significance of the potential effect on heritage. The appraisal narrative should be considered as a whole.	No further action required.
Appendix IX	We do not accept the explanation of why 275 was selected. It makes no reference to the criteria assessed in the SA or indeed the <i>relative</i> performance of 275 having regard for these criteria. The SA is meant to test (and preferably rank) the sustainability of various options. It is wholly wrong, as a matter of law, for the SA simply to "inform" decision making. Section 12(2)(b) clearly sets out that the SA should "evaluate the likely significant effects on the environment.... of reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme". The Local Plan Part 1 does not state, as an objective, that plan-making should be content with 'adequate' outcomes – it is aspirational. There is, in short, both in the statutory plan, but also in the NPPF (paragraph 14, including Footnote 9, and paragraph 152 of the NPPF), a requirement (and hopefully a desire) to achieve the most sustainable outcome from plan-making. Paragraph	Noted and disagree. SA is an assessment tool that informs decision-making. As stated in Paragraph 001 of the extant SA guidance (NPPG), " <i>Sustainability appraisal should be applied as an iterative process informing the development of the Local Plan</i> ". It also states in Para 017, " <i>Reasonable alternatives should be identified and considered at an early stage in the plan making process, as the assessment of these should inform the local planning authority in choosing its preferred approach</i> ".	No further action required.

SA Report Reference	Comment	Response	Action Required
	152 of the NPPF provides a good summary:		
General	In our opinion, as set out in Section 2.1 of these representations, our revised Master Plan for 1871 and 275 performs significantly better (and avoids significant adverse impacts) in relation to the National Park, landscape character and accessibility. As evidenced in our FOIA response (see our Appendix 3) it is only the City's skewing of the evidence that has sustained the allocation of 275.	Opinion noted.	No further action required.
Appendix IX	We do not accept that listing 1871/2561 as a site "less supported by the local community" is an appropriate reason for the SA to reject these sites. This is not a criteria grounded in sustainability and, besides, the difference in support (as explained elsewhere in this document) was not subject to scrutiny by WCC or Enfusion.	Opinion noted. As previously stated, the SA does not reject site options, it informs the Council's site selection process.	No further action required.
Evidence	We do not accept the findings of the landscape assessment for 1871/2561, which changed from not being sensitive in the July 2013 assessment to most/highly sensitive in October 2013 (see Appendix 2). This therefore has substantial implications for the conclusions of the SA.	Noted. This is a matter for plan-making.	No further action required.
Appendix VI	In addition to the above comments, we find that our concerns are only compounded by the SA of Potential Site Allocations (Appendix VI of the SA). The assessment of effects for Colden Common are at best inconclusive, but also fail to 'rank' deliverable options or identify any unequivocal margin of sustainability between Site 275 and the other sites, including 1871 and 2561 (the SA plainly shows that 275 performs far worse on sustainability grounds):	Noted. Please refer to previous responses.	No further action required.
Appendix VI	1. Building Communities The partial hardstanding at 275 can barely be considered as 'brownfield' as it creates very few externalities. It is justified to score this as a "positive effect" in favour of 275,	Opinion noted.	No further action required.

SA Report Reference	Comment	Response	Action Required
	but not a "major positive effect". In contrast, two storey housing will have major negative effects on the National Park and adjoining Ancient Woodland. The SA refers to mitigation, but none has been proven since the planning application for Sandyfields was submitted more than 12 months ago and the recent Design Review Panel is scathing.		
Appendix VI	<p>2. Infrastructure</p> <p>With regard to the reference to public open space, we note that none can be provided if Sandyfields remains at the current capacity of 165 – a major negative, incompatible with policy. In contrast, 1871/2561 offers new public open space, which ought to be assessed as positive according to the SA.</p>	<p>Noted. The appraisal states the following on Pg. 22 of Appendix VI:</p> <p><i>"None of the sites will result in the loss of open space in Colden Common; shortfalls have been identified for most types of open space including: Equipped Children's & Young People's Space; Informal Green Space; Natural Green Space; and Parks and Recreation Grounds (although there is only a shortage of parks)"</i>.</p> <p><i>"Any increase in development could put additional pressure on these areas and increase the shortfall and therefore is considered to have major negative effects. However, CP7 requires that new housing development should make provision for public open space and built facilities in accordance with the most up to date standards (set out in Tables 1 and 2), preferably through on-site provision of new facilities where feasible or by financial contributions towards off-site improvements"</i>.</p>	No further action required.
Appendix VI	3. Housing	Noted.	No further

⁷ Winchester City Council (2013) LDF Core Strategy – Policy CP7 Open Space Standards. Public Open Space Assessment: Colden Common.

SA Report Reference	Comment	Response	Action Required
	We note that 1871/2561 has capacity to provide for the full range of affordable housing needs.		action required.
Appendix VI	4. Economy & Employment We note that 2561 is recorded in the SA as having potential for a mix of uses. We confirm that, as employment specialists, we would be happy to include a small business park for small to medium sized businesses, if requested. Our master plan provides for some sheltered accommodation. There is no room on 275 for 165 houses, let alone any employment in addition.	Noted.	No further action required.
Appendix VI	5. Transport We are surprised that 275 is not classified as "remote", and scored negatively as a result, given the 800m -1600m criterion. Accessibility is such a core component of sustainability. In light of our concerns about bias, we strongly object to the references to Church Lane experiencing heavy traffic at peak times. This statement has had no regard for the Transport Statement we submitted in December 2014 and it is totally out of kilter with the campaign (sponsored by the local MP) to ease traffic congestion and speeds on Main Road (yet this gets no mention).	Noted. Site 275 is situated adjacent to the existing settlement. The SA refers to heavy traffic on Church Lane as that is what the evidence ⁸ suggests.	No further action required.
Appendix VI	6. Biodiversity It is surprising that there are no negative points noted for 275, despite the outstanding objections on ecology in relation to the planning application. 1871 scores a positive on biodiversity and we can confirm that we will create additional priority habitats as suggested in the SA. We have the spare land to do this.	Noted.	No further action required.
Appendix VI	7. Landscape & Soils	Noted. The appraisal within Appendix VI	No further

⁸ Commonview Group (2012) Colden Common Village Design Statement.

SA Report Reference	Comment	Response	Action Required
	We note that the National Park is mentioned in the context of 1874, 1870 and 275. So far as the latter is concerned, our FOIA request has revealed that insufficient mitigation is available and the proposal to open up the adjoining ancient woodland for public access is not supported. As well as giving rise to major negative effects in the SA (currently not recorded), this also means that the proposed site capacity of 165 units cannot be achieved.	already identifies that there is the potential for major significant negative effects at these sites against SA Objective 13. The appraisal narrative notes that LPP1 Policy MRTA2 requires that development should protect areas designated for their local, national, or international importance, such as Gaps and the South Downs National Park. It also identifies that mitigation is provided to a certain extent by MTRA2 with the requirement that development will need to be an appropriate scale and design. Finally, the appraisal identifies that there is also the potential for the provision of suitable buffers and green infrastructure that would help to minimise negative effects. Further work has been carried out to demonstrate that the site is able to accommodate 165 dwellings.	action required.
Appendix VI	8. Built Environment We note that the SA states: "local residents valued the fact that the village boundary is to the west of Main Road and is screened by trees and hedges, which enhances the rural aspect of the village.... Development to the east of this road may harm what the villagers value" . The SA records an overall positive under this criterion, but surely this does not apply to 275, which is on the east side of Main Road?	Noted. While the site does lie to the east of Main Road, evidence suggests view from the road towards the site is limited and or built development.	No further action required.
Appendix VI	Appendix IX adds further to our concerns. There is a broad statement that Site 275 "scores best or equal best on many of the key criteria and has also received significantly higher levels of community support than other sites". We can find no basis for this statement in the SA as no comparative	Noted. Each reasonable (realistic and deliverable within the scope, timescales and objectives of the Plan) site option was considered against the full SA Framework. The detailed appraisal matrix was provided in	No further action required.

SA Report Reference	Comment	Response	Action Required
	<p>assessment was made, nor has the SA been updated to assess our proposed smaller option at Church Lane (c45 units). We also object to the statement that the landscape assessment identifies 1871 and 2561 as 'most or highly sensitive' based on the most cursory of landscape evidence provided by the City in September 2013 and without any regard for the LVIA we submitted in December 2014 or, indeed, the conclusively proven impact that 165 houses at 275 has on the National Park.</p>	<p>Appendix VI with summary findings provided in Section 4 of the SA Report.</p> <p>The SA considered 20 potential site options for the settlement, identified through the SHLAA, and provides a comparative assessment that identifies significant effects for individual sites as well as potential cumulative effects of those sites for the settlement. The approach and method used gives plan makers the ability to consider the potential effects of individual sites as well as different combinations of sites against the SA Framework. Site allocations could potentially be combined (as whole/part sites) in any number of combinations and would be far too numerous to consider and would be completely disproportionate, making it impossible to devise and assess every potential detailed alternative. The NPPF and NPPG uphold the principles of proportionality.</p> <p>It is also important to note that the SA is an assessment tool that informs decision-making, it is just one part of the Council's site selection process. Other evidence, consultation responses and wider planning judgements also play a role in the Council's decision to progress with either an individual or combination of sites.</p>	

SA Report Reference	Comment	Response	Action Required
		<p>In <i>Ashdown Forest Economic Development LLP v Wealden DC</i>⁹, Sales, J held the choice of alternatives for environmental assessment is a matter of planning judgment and that the planning authority has a substantial area of discretion as to the extent of the inquiries which need to be carried out to identify the reasonable alternatives which should then be examined in greater detail</p> <p>The method used meets the requirements of the SEA Directive and Regulations as well as extant guidance and case law. It is considered proportionate for the level of plan-making and gives plan makers the ability to consider the potential effects of individual sites as well as different combinations of sites against the SA Framework. It should be noted that the same method was used to consider reasonable site options through the SA process for the South Worcestershire Development Plan (SWDP). The SA and the Plan were recently found sound through independent Examination and the SWDP adopted in February 2016.</p> <p>A comparative appraisal of reasonable site options is presented in Appendix VI. Appendix IX sets out the reasons for the selection or rejection of reasonable site options in plan-making.</p>	

⁹ [2014] EWHC 406 (Admin)

SA Report Reference	Comment	Response	Action Required
Appendix VI	In light of the above, we question how the proposed site selection of 275 is supported by the updated SA (2015). The intention of the SA should be to ensure that WCC gets the fundamental question right – ie the choice of site(s) when balanced against reasonable alternatives. And a sites comparison is required. This is not an onerous task, given that many of the possible sites in Colden Common have been screened out. In addition, we suggest that the SA fully addresses potential impacts on the National Park.	Noted. As set out in previous responses, a comparative appraisal of all reasonable site options has been carried out and is presented in Appendix VI. The findings of this work informed the Council's site selection process. The potential impacts on the National Park have been fully considered bot through the SA and the Council's wider site assessment process.	No further action required.
	Overall, we conclude that the SA serves no purpose, it cannot be used to advance sustainability objectives as no comparative assessment is given, it is therefore not legally compliant; acting only to underscore the lack of soundness in the preparation of LPP2.	<p>Noted and disagree. Each reasonable (realistic and deliverable within the scope, timescales and objectives of the Plan) site option was considered against the full SA Framework. The detailed appraisal matrix was provided in Appendix VI with summary findings provided in Section 4 of the SA Report.</p> <p>The SA considered 20 potential site options for the settlement, identified through the SHLAA, and provides a comparative assessment that identifies significant effects for individual sites as well as potential cumulative effects of those sites for the settlement. The approach and method used gives plan makers the ability to consider the potential effects of individual sites as well as different combinations of sites against the SA Framework. Site allocations could potentially be combined (as whole/part sites) in any number of combinations and would be far too numerous to consider and would be completely disproportionate, making it impossible to devise and assess every potential detailed alternative. The NPPF and</p>	No further action required.

SA Report Reference	Comment	Response	Action Required
		<p>NPPG uphold the principles of proportionality.</p> <p>It is also important to note that the SA is an assessment tool that informs decision-making, it is just one part of the Council's site selection process. Other evidence, consultation responses and wider planning judgements also play a role in the Council's decision to progress with either an individual or combination of sites.</p> <p>In <i>Ashdown Forest Economic Development LLP v Wealden DC</i>¹⁰, Sales, J held the choice of alternatives for environmental assessment is a matter of planning judgment and that the planning authority has a substantial area of discretion as to the extent of the inquiries which need to be carried out to identify the reasonable alternatives which should then be examined in greater detail</p> <p>The method used meets the requirements of the SEA Directive and Regulations as well as extant guidance and case law. It is considered proportionate for the level of plan-making and gives plan makers the ability to consider the potential effects of individual sites as well as different combinations of sites against the SA Framework. It should be noted that the same method was used to consider reasonable site options through the SA process for the South Worcestershire Development</p>	

¹⁰ [2014] EWHC 406 (Admin)

SA Report Reference	Comment	Response	Action Required
		<p>Plan (SWDP). The SA and the Plan were recently found sound through independent Examination and the SWDP adopted in February 2016.</p> <p>A comparative appraisal of reasonable site options is presented in Appendix VI. Appendix IX sets out the reasons for the selection or rejection of reasonable site options in plan-making.</p>	
Gladman (51995)			
Alternatives	As objectively assessed needs for housing are at present not currently being met, Gladman maintain that this is a valid reasonable alternative that should have been considered through the SA process. Gladman contend that consideration of this alternative would not undermine the LPP1 as it would accord with the national growth agenda which seeks to boost significantly the supply of housing and meet the Council's full objectively assessed housing needs.	Noted. This is a matter for plan-making. Reasonable options for the overall level of growth were considered through the adopted LPP1 and its accompanying SA process. Please refer to the Housing Background Paper prepared by the Council.	No further action required.
City of Winchester Trust (50168)			
General - Traffic	The Sustainability Appraisal (SA) assesses the individual development sites in some detail and their proximity to existing settlements and facilities but there is a lack of consideration about the scale of the increase in traffic which will arise over the period of the plan a result of all these developments taken together both within the District and the further impact from increased traffic in the District as a result of development in neighbouring districts.	Noted. The overall level of growth to be delivered in the District was set out within the adopted LPP1, which was subject to SA. The potential effects of site options as well as the LPP2 as a whole (policies and preferred sites) on traffic has also been considered. Please refer to Sections 4, 5, 6 & 8 and Appendix VI of the Pre-Submission SA Report (September 2015).	No further action required.
General	The SA has an objective of increasing accessibility,	Noted. Please refer to Paragraph 5.39 in the	No further

SA Report Reference	Comment	Response	Action Required
	reducing car usage and the need to travel but it does not identify the measures needed to achieve this nor that these are absent from LPP2. The SA acknowledges the negative effects of traffic on air quality and traffic congestion in Winchester at the moment and accepts that these could get worse. It seems over optimistic that the vague measures it refers to will address these problems. It does not raise the important point that many of the recommendations in the MVA Transport Report are not referred to nor addressed in LPP2. For example, the MVA Transport Report supports the use of park and ride as a parking and access strategy but emphasises that this must be accompanied by a reduction in parking places within Winchester if it is to be effective in reducing traffic congestion and improving air quality.	Pre-Submission SA Report (September 2015).	action required.
Winchester Action on Climate Change (50174)			
Appendix VI	The Sustainability Appraisal is not 'sound' because the list of sites it bases its appraisal on, listed in groups in the Appendix, is not the same as the list of sites that LPP2 is currently proposing. There is no similarity between the aggregation of the sites appraised and the aggregation of the sites proposed by LPP2.	Noted and disagree. The summary findings of the SA for reasonable site options are presented in Section 4 of the Pre-Submission SA Report, with the detailed appraisal matrices provided in Appendix VI. The findings of the SA for LPP2 as a whole (including policies and preferred sites) is presented in Section 5 and 6 of the Pre-Submission SA Report (September 2015).	No further action required.
Appendix VI	The SA is irrelevant, or at least unreliable, as an assessment of the sustainability of LPP2's proposals. A list comparing Winchester Town Area SHLAA sites looked at by the SA and sites included in LPP2 is attached in the upload facility. A total of 17,200 units were included in the SA assessment of sites in or near Winchester Town. Of these only 692 units were included in LPP2. LPP2 refers to a further 2494 units	Noted and disagree. The SA considers a number of reasonable site options to help meet the identified level of growth proposed for Winchester Town through LPP1, which was also subject to SA. Winchester Town was split into 5 'areas' given the number of potential sites; therefore 5 detailed matrices were	No further action is required.

SA Report Reference	Comment	Response	Action Required
	that are not considered by the Sustainability Appraisal. In addition, the Sustainability Appraisal does not provide a legible trail of the deductions it makes from its observations. Worse, some of the observations it makes appear to be misleading or false interpretations.	produced for that settlement in Appendix VI of the SA Report. The SA is an assessment tool that informs decision-making, it is just one part of the Council's site selection process. Other evidence, consultation responses and wider planning judgements also play a role in the Council's decision to progress site options. The Council progressed to help meet the remaining housing requirement for Winchester Town that is not already being met through strategic allocations, such as Barton Farm, windfall and other development opportunities.	
General	The net effect of this is that the Sustainability Appraisal fails even to address the following questions: what impact will the 12,857 new housing units proposed by LPP2 have on Winchester District, and what measures need to be taken to ensure that the results are sustainable? It is not accurate in its treatment of where developments will be, and it is vague in its methodology for assessing how the proposals stack up. It looks at groups of sites in isolation, and fails to employ a methodology to assess how the sum of the sites will have an impact as a whole. It does not consider developments in neighbouring districts. With transport impacts, and many environmental impacts, the cumulative effect will be exponential. It seems to assume that the cumulative impacts will be additive. For example, it has no methodology for assessing how new housing units in Bishop's Waltham will have an impact on the traffic system of Winchester and vice versa. Without a district-wide traffic impact study, such an assessment is impossible.	Noted. LPP1 sets out the overall level of growth for the District, which was subject to SA. LPP2 does not propose an additional 12,827 units, it seeks to identify allocations to meet the level of growth set out in the adopted LPP1. For LPP2, the summary findings of the SA for reasonable site options are presented in Section 4 of the Pre-Submission SA Report, with the detailed appraisal matrices provided in Appendix VI (SA Objective 5 relates to Transport). The findings of the SA for LPP2 as a whole (including policies and preferred sites) is presented in Section 5 and 6 (which includes a Transport topic) of the Pre-Submission SA Report (September 2015).	No further action required.
Para 3.50	Para 3.50 identifies the following 'distilled' transport issue	Noted and disagree. Please refer to response	No further

SA Report Reference	Comment	Response	Action Required
	from the scoping report: Winchester City experiences significant problems with traffic congestion, exacerbated by high commuting trends of workers leaving the City to work in the South East and lower paid workers commuting into the City. The District has a proportionately higher level of car ownership when compared with neighbouring authorities. However there is no indication of how this has been taken into account of in the conclusions.	above.	action required.
Table 3.1	It formally identifies key sustainability issues in table 3.1 as: reducing unsustainable traffic and transport trends (commuting patterns), including associated carbon emissions by reducing the need to travel by car and creating opportunities for renewable energy development. However there is no indication of how this has been taken account of in the conclusions.	The SA Framework was developed to address the key sustainability issues. All reasonable site options have been considered against the full SA Framework in Appendix VI. LPP2 (including policies and preferred sites) have been considered against a number of key topics in Section 5 and 6 of the Pre-Submission SA Report (September 2015), which are closely linked to the SA Objectives.	No further action required.
Pg 61	Cumulative negative effects are identified on Traffic for Bishop's Waltham but no mitigation measures suggested and there is no indication of how this has been taken into account in the conclusions.	Please refer to the detailed appraisal matrices in Appendix VI and the appraisal of the Draft and Pre-Submission LPP2 provided in Sections 5 and 6 respectively.	No further action required.
Pgs 63 & 78	Cumulative negative effects are identified on Traffic for Colden Common but no mitigation measures suggested and there is no indication of how this has been taken into account in the conclusions.	Please refer to response above.	No further action required.
Pg 66	Cumulative negative effects are identified on Traffic for King's Worthy but no mitigation measures suggested and there is no indication of how this has been taken into account in the conclusions.	Please refer to response above.	No further action required.
Pg 69	Cumulative negative effects are identified on Traffic for Swanmore but no mitigation measures suggested and there is no indication of how this has been taken into	Please refer to response above.	No further action required.

SA Report Reference	Comment	Response	Action Required
	account in the conclusions.		
Pg 72	Road safety concerns are expressed about sites along Titchfield Lane, but no mitigation measures are suggested and there is no indication of how this has been taken into account in the conclusions.	Please refer to response above.	No further action required.
Pg 75	Cumulative negative effects are identified on Traffic for North Winchester Town and it is pointed out that congestion already takes place but no mitigation measures suggested and there is no indication of how this has been taken into account in the conclusions.	Please refer to response above.	No further action required.
Pgs 77 & 88	Cumulative negative effects are identified on Traffic for North East Winchester Town and it is pointed out that congestion already takes place but no mitigation measures suggested and there is no indication of how this has been taken into account in the conclusions.	Please refer to response above.	No further action required.
Pgs 81 & 91	Cumulative negative effects are identified on Traffic for South West Winchester Town and it is pointed out that congestion already takes place but no mitigation measures suggested and there is no indication of how this has been taken into account in the conclusions.	Please refer to response above.	No further action required.
Pg 85	Cumulative negative effects are identified on Traffic for North West Winchester Town and it is pointed out that congestion already takes place but no mitigation measures suggested and there is no indication of how this has been taken into account in the conclusions.	Please refer to response above.	No further action required.
Pg 109	SA Objective 5: to increase accessibility, reduce car usage and the need to travel: The SA has failed to address this objective, and as such is not 'sound'. The SA refers to a detailed transport assessment that was written in 2009 and was in response to the previous local plan, the Local Development Framework. No such comprehensive study accompanies the current Local Plan	Noted. The SA is informed by the best available evidence at the time. Please refer to Paragraph 5.39 in the Pre-Submission SA Report (September 2015).	No further action required.

SA Report Reference	Comment	Response	Action Required
	<p>draft.</p> <p>There is still a need for an updated detailed transport assessment into the likely impact of all the sites now proposed. Without such a study there is no way of knowing whether the mitigation measures referred to are sufficient.</p> <p>The only new assessments done for this plan were assessments of three proposed sites in Bishop's Waltham. Even these were inadequate because they did not assess how all the sites proposed in the whole district and in neighbouring districts would combine and interact to affect traffic volumes in Bishop's Waltham, neither did they consider how traffic generated at the three sites studied would affect network use throughout the district.</p> <p>The Bishop's Waltham assessments assume that each housing unit will generate seven car trips per day. This approach needs to be applied to the impact of all the new housing units proposed in LPPs 1 and 2. 12,500 new units across the district imply 87,500 trips of between 8 and 12 miles across the district, and new units in neighbouring districts will increase traffic even more. 4,000 or more new units in Winchester will increase traffic there by 28,000 trips. Winchester will also be inundated by many of the 59,500 new trips generated elsewhere in the district. The SA says many times that Winchester is already congested - then says policies that express vague hopes that something will happen will be sufficient mitigation. The scale of the likely problem (acknowledged in para 5.41) is such that there will be no mitigation without practical concrete proposals. The measures referred to in 5.42 are simply not enough.</p> <p>The MVA consultancy report is referred to as if it is a</p>		

SA Report Reference	Comment	Response	Action Required
	<p>demonstration that Winchester City Council is serious about tackling transport issues. However, it made a number of recommendations that have not been implemented. The fact they have not been implemented could be seen as an indication that the Councils are not tackling transport issues.</p> <p>The MVA recommendations go far beyond the vague policies mentioned in the SA. The SA fails to take into account the MVA recommendations on required mitigation measures (at a time when fewer housing units were proposed):</p> <p>Elsewhere, the MVA transport assessment had some useful suggestions for reducing the transport carbon footprint in Winchester Town that have been specifically discarded, for example:</p> <p>It is especially unsound that LPP2 proposes the abolition of saved policy W6. This was a practical rule to tackle congestion in central Winchester and reflected the last sentence in the extract above. It said that "in order to reduce traffic flows in central Winchester ... the development of additional car parks in central Winchester will not be permitted" and that any new park-and-ride parking spaces will be accompanied by a reduction of the same number of parking spaces in central Winchester. MVA's final recommendations about transport throughout the district which have been ignored:</p>		
Para 5.47	<p>Synergistic and Cumulative Effects of Transport and Accessibility: The seriousness of the problem is acknowledged, but it is vague about how deteriorating air quality will be mitigated, and fails to address congestion sufficiently given the lack of a new traffic flow study, and</p>	Noted. Please refer to Paras 5.54 and 5.55 in the Pre-Submission SA Report (September 2015).	No further action required.

SA Report Reference	Comment	Response	Action Required
	the lack of concrete proposals to manage the increasingly unsustainable situation.		
Para 5.60	<p>Climate Change. The SA says that “all of the site allocations were considered likely to increase traffic and therefore have minor indirect negative effects on climate change through increased emissions of greenhouse gases.” It should therefore not state that the indirect effects are minor without a traffic analysis to support this view.</p> <p>It is also wrong to assume that the policies alone will provide a sufficiently extensive and robust set of measures. There is no analysis to demonstrate the extent to the policies will effectively reduce emissions. The SA has neither a quantitative analysis of the increase in traffic emissions, nor a quantitative analysis of the likely reduction in emissions brought about by the policies. The SA is not in any position to draw a ‘sound’ conclusion.</p>	<p>Noted and disagree. The SA is informed by the best available evidence at the time.</p> <p>It is also important to note that the NPPF and NPPG uphold the principles of proportionality and this is a strategic level assessment. Extant guidance (NPPG) states that the SA, “<i>does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan</i>”.</p>	No further action required.
Appendix VI	Winchester Town North detailed appraisal: This appraisal looks at sites for 1617 dwellings. Only 33 of these are within the boundary and therefore adopted for LPP2. Meanwhile it has ignored the 2000 units at Barton Farm from LPP1. It is therefore not appraising the proposals put forward in LPP2 and is therefore an unsound part of the evidence.	Noted. Please refer to previous responses.	No further action required.
Appendix VI	Winchester Town North-East detailed appraisal: This appraisal looks at sites for 851 dwellings. Only 148 of these are within the boundary and therefore adopted for LPP2. Meanwhile proposals for Silver Hill have increased. It is therefore not appraising the proposals put forward in LPP2 and is therefore an unsound part of the evidence.	Noted. Please refer to previous responses.	No further action required.
Appendix VI	Winchester Town South-East detailed appraisal: This appraisal looks at sites for 291 dwellings. Only 77 of these are within the boundary and therefore adopted for LPP2. It	Noted. Please refer to previous responses.	No further action required.

SA Report Reference	Comment	Response	Action Required
	is therefore not appraising the proposals put forward in LPP2 and is therefore an unsound part of the evidence.		
Appendix VI	Winchester Town South-East detailed appraisal: This appraisal looks at sites for 291 dwellings. Only 77 of these are within the boundary and therefore adopted for LPP2. It is therefore not appraising the proposals put forward in LPP2 and is therefore an unsound part of the evidence.	Noted. Please refer to previous responses.	No further action required.
Appendix VI	Winchester Town South-West detailed appraisal: This appraisal looks at sites for 12,932 dwellings. Only 154 of these are within the boundary and therefore adopted for LPP2.. In addition 494 dwellings are due to be built in this area. It is therefore not appraising the proposals put forward in LPP2 and is therefore an unsound part of the evidence.	Noted. Please refer to previous responses.	No further action required.
Appendix VI	Winchester Town North-West detailed appraisal: This appraisal looks at sites for 1509 dwellings. Only 96 of these are within the boundary and therefore adopted for LPP2. It is therefore not appraising the proposals put forward in LPP2 and is therefore an unsound part of the evidence.	Noted. Please refer to previous responses.	No further action required.
General	<p>A Sustainability Appraisal needs to be written that looks at the sites and only the sites proposed by LPPs 1 and 2.</p> <p>A traffic movement and impact study that looks at the combined impact of all the developments proposed and at proposals in neighbouring authorities, and that makes focussed practical recommendations about how the combined impacts can be mitigated that take up the analysis where the MVA study left off. It could include recommendations about how the policies and strategies referred to in LPP1 can be incorporated into practical measures in LPP2.</p>	Noted. Please refer to previous responses.	No further action required.
John Hayter (50342)			

SA Report Reference	Comment	Response	Action Required
General – housing need	Contrary to 2012 Local Plan Reg 12(7), the amount of development the SA/SEA and supporting AMR considers is based on an out-of-date evidence base and does not include any upward only revisions for such as house prices, overcrowding and homeless.	Noted. This is a matter for plan-making. Please refer to the Housing Background Paper prepared by the Council.	No further action required.
General – housing need	The SA/SEA does not conform to LPP1 10.13 and 10.14 commitment to revise/roll forward midway through plan period unless previously triggered as the latest evidence shows has now occurred and as envisaged by LPP2 7.4. Flexibility is required (but not provided) through the whole Plan period to take full account of up-to-date ONS/HCC population and housing projections and upward revisions for adverse trends in housing market and economic signals. To avoid frequent LPP2 updates some flexibility is also required for future upward adjustments that will taper as 2031 approaches and LPP1 is extended.	Noted. This is a matter for plan-making. Please refer to the Housing Background Paper prepared by the Council.	No further action required.
General – housing need	The LPP2 SA/SEA has not assessed needed LPP2 development quantities, strategies and policies and does not contribute to the Plan's evidence base (NPPF165). LPP1 provides for this flexibility (10.1) and is not affected. Even if the SA were found to be legal, LPP2 as a whole would still fail the soundness tests.	Noted. This is a matter for plan-making. Please refer to the Housing Background Paper prepared by the Council.	No further action required.
General	2014 AMR (revised 30.1.15) Contents page shows CP8, 9 & 10 have not been considered. These are the 3 which relate to climate change and thus by far the greatest threat to deliverability of the combined effectiveness of the LPP1 and LPP2 policies.	Noted. This is primarily a matter for plan-making.	No further action required.
General	The SA/SEA omits consideration of development density and its constraints (NPPF99, LPP1 CP 20 and High Quality Places SPD) in all policy areas. Nor in most policy areas to which it is relevant is "heritage" considered either (NPPF126). For Winchester Town there is no +ve/-ve assessment for Barton Farm, the SA Report is not consistent	It should be noted that the overall level of growth to be delivered in the District during the life of the Plan, including strategic allocations at Barton Farm, W. Waterlooville and Whiteley, were all considered through the SA process for the LPP1.	No further action required.

SA Report Reference	Comment	Response	Action Required
	with the policy areas and consideration of many matters is correspondingly missing. Consideration of the W. Waterlooville and Whiteley growth areas is also completely missing.		
Apache Capital (51465)			
Appendix II	<p>Respondent refers to previous submissions at the Reg 18 stage.</p> <p>Review of the sustainability appraisal and other supporting information related to the short-listed sites at Kings Worthy to justify which, in accordance with national policy, is the most sustainable development opportunity and therefore most effective option.</p>	Please refer to responses provided in Appendix II of the Pre-Submission SA Report (September 2015). The reasons for the selection or rejection of site options in plan-making is provided in Appendix IX of the Pre-Submission SA Report (September 2015).	No further action required.
Various Respondents			
Consultation	A number of respondents, particularly from Alresford, have stated that they have not been able to comment on the SA as they were not informed of it being available and no paper copy was made available in Alresford Library.	Noted. Given the size of the SA Report & Appendices (over 600 pages) a paper copy of the SA Non-Technical Summary was provided alongside the Local Plan during the Regulation 19 Pre-submission consultation. The library has public access computers so those wishing to see the full version could do so. Alternatively, they could contact the Council and ask to see a paper copy.	No further action required.
Kenneth Jones (51934)			
	The Sustainability Appraisal has largely been hidden from view. It doesn't compare all reasonable alternatives - in fact, it doesn't even list all of those sites that have actually been allocated.	Noted and disagree. The summary findings of the SA for reasonable site options are presented in Section 4 of the Pre-Submission SA Report, with the detailed appraisal	Table 4.17 and Appendix VI to be updated.

SA Report Reference	Comment	Response	Action Required
	<p>SA findings on the loss of agricultural land, transport impacts and economic impacts directly contradict other documents within the evidence.</p> <p>The SA also suggest that developing at Arlebury Park would lead to the loss of a sports pitch, even though no such sports pitch exists. The suggestion that the Sun Lane site is within 400 metres of a bus stop is laughable.</p>	<p>matrices provided in Appendix VI. The findings of the SA for LPP2 as a whole (including policies and preferred sites) is presented in Section 5 and 6 of the Pre-Submission SA Report (September 2015).</p> <p>Please refer to responses to the Alresford Professional Group and Savills on behalf of Alfred Homes above.</p>	
Steve Harbourne (50500)			
	<p>Key issue raised (Table 0.1) 'Reduce unsustainable transport trendsincluding carbon emissions etc': Development on the scale now being proposed - and already being implemented through a design competition for this area in advance of approval of the Local Plan Part 2 - will add hugely to the environmental pressures that have already been previously commented on in a sustainability report. Far from reducing unsustainable traffic and associated carbon emissions, these policies (for example to create a commercial hub) will exacerbate traffic problems.</p> <p>Additionally, plans already moving forward have yet to include any detailed or credible traffic movement plan. The study relied upon by WCC has been produced by Urban Flow consultants and is in my view seriously flawed for two reasons:</p> <ol style="list-style-type: none"> 1. The creation of 200o new homes at Barton Farm was specifically excluded from this travel / parking report. 2. The methodology used in the report - which is now being used by WCC to justify changes in parking provision in this area - relied solely on 'assumed rather than actual ' 	<p>Noted.</p> <ol style="list-style-type: none"> 1. It should be noted that the overall level of growth to be delivered in the District during the life of the Plan, including strategic allocations at Barton Farm, W. Waterloooville and Whiteley, were all considered through the SA process for the LPP1. 2. This is primarily a matter for plan-making. 	No further action required.

SA Report Reference	Comment	Response	Action Required
	selection of route to car parks (i.e. they failed to use actual respondent information, instead relying on google maps.		
Keith Barrett (Search-South) (51414)			
	The Sustainability Appraisal fails to consider all reasonable alternatives and does not give any indication as to why some sites have been allocated (see attached). In addition, a number of residents have been in touch in recent days to say that the Sustainability Appraisal has not been made available for review for those who do not have Internet access. This is troubling and I note that the Draft version of the Sustainability Appraisal received very few comments, having been similarly difficult to track down.	Noted and disagree. The reasons for the selection or rejection of site options are presented in Appendix IX of the SA Report. Given the size of the SA Report & Appendices (over 600 pages) a paper copy of the SA Non-Technical Summary was provided alongside the Local Plan during the Regulation 19 Pre-submission consultation. The library has public access computers so those wishing to see the full version could do so. Alternatively, they could contact the Council and ask to see a paper copy.	No further action required.
Mike Tomlins (51899)			
	I've commented separately on the contents of Local Plan Part 2. The Sustainability Appraisal appears to be a confused piece of work. Sites have been selected within Alresford, with the biggest site selection being site 277. According to the SA, this is listed as having one key positive impact (housing). That key positive impact is shared by every other site available in Alresford according to the SA document. Then the document lists key negative impacts. Site 277 is listed as having a key negative impact on water (in common with all sites) and landscape/soils, due to the loss of agricultural land. There is no mitigation offered for that loss of agricultural land.	Noted and disagree. The summary findings of the comparative appraisal of site options is presented in Section 4 of the SA Report. The detail of this work is presented in Appendix VI. Appendix IX sets out the reasons for the selection or rejection of reasonable site options in plan-making. It is stated on Pg. 1 of Appendix IX that, <i>"It should be noted that whilst the SA findings are considered by the Council in its selection of options and form part of the evidence supporting the LPP2, the SA findings are not the sole basis for a decision; other factors, including planning and</i>	No further action required.

SA Report Reference	Comment	Response	Action Required
	<p>On the other hand there are other sites that are recorded as having the same key positive impacts but have no identified key negative impacts at all. Site 2552 being an obvious example. However, site 2552 is excluded from the process. There is no direct comparison to indicate why. None of the sites are compared in tabular form. This means that residents are unable to see the basis upon which selections have been made.</p> <p>Appendix IX is then entitled "Reasons for Selecting or Rejecting Site Options in Plan Making". This appears to be an attempt to explain the site selections, although it contradicts much of the main body of the SA. It may be that the Appendix was written by WCC planning officers, unlike the rest of the document.</p> <p>The explanation for selecting site 277 states:</p> <p>"The 'most sensitive' areas in landscape terms comprise the highest parts of the site, particularly the ridge that runs east-west through the central part of the site. The location of the proposed housing has been carefully defined so as to ensure that the southern edge of the housing is kept below the ridgeline when viewed from the south. While this involves the loss of some 'most sensitive' land, the housing proposed at Sun Lane under the 'alternative plan' also has its southern boundary in a similar location and extends into the 'most sensitive' land on the eastern side of the site. Therefore, while the Local Plan allocation uses more land that is defined as 'most sensitive', its impact in the most common viewpoints is no greater than the alternative plan. The alternative plan makes minimal use of land in the northern part of the site that is 'least sensitive' in landscape terms, so would have more landscape impact than is necessary for the amount of housing it proposes."</p> <p>Quite apart from the fact that this section should be explaining why the site has been selected (rather than</p>	<p><i>deliverability, play a key role in the decision-making process".</i></p>	

SA Report Reference	Comment	Response	Action Required
	<p>comparing to a completely different overall strategy), the wording above is complete nonsense. An examination of site 277 reveals that a large swathe of the 'most sensitive' area will need to be used, since 10 hectares of housing has been allocated. It will infringe upon both the NE corner of the site and the central belt. For the City Council to pretend otherwise calls into question their objectivity. Their comparison with the 'alternative plan' is also ridiculous. Both plans place housing on land at the north of the site. The 'alternative plan' proposes less housing. It is physically impossible, therefore, for the 'alternative plan' to have a more negative impact on the landscape. The Sustainability Appraisal (Appendix IX) then briefly states why other sites were apparently rejected:</p> <p>"The remaining sites were rejected as they would not deliver local needs as well as the proposed sites, including to maintain and increase employment levels and deliver a burial ground. In addition, combinations of the following factors were also considered:-</p> <ul style="list-style-type: none"> • They are in the settlement boundary where there is a presumption in favour of development (LPP2 Policy DM1). These sites do not need to be formally allocated in LPP2, but are a component of the housing land supply. Sites: 1966, 2123 • The site is distant from the built-up area of the settlement and is therefore not well related to existing facilities and services. Site: 2533 • The Landscape assessment identifies the site as 'most or highly sensitive' raising landscape concerns. Sites: 278, 1927, 2408, 2553 • Transport issues have been raised through the assessment in terms of accessibility or access. Sites: 1927, 2553 • The site would result in a loss of a facility or service. Sites: 278 (now provides rugby pitches) 		

SA Report Reference	Comment	Response	Action Required
	<ul style="list-style-type: none"> • The site is underlain by mineral reserves. Site: 2408 • The site is below the size threshold for allocation in LPP2. Site: 276" <p>It is noted that this entire section fails to mention one of the sites (SHLAA site 2552). No attempt is made to highlight any constraints relating to that site.</p> <p>There is then suddenly a paragraph at the end of this section, where the existence of site 2552 is finally acknowledged but it is dismissed in the following terms: "The site is readily accessible and performs well in terms of this key criterion. The area is also not in a Settlement Gap, but this applies to all sites in Alresford. It performs moderately in terms of accessibility to facilities and services, landscape impact, meeting other needs, and community views, but poorly on all other criteria, including relationship to the settlement boundary and physical and policy constraints. Accordingly, this area is amongst the worst performing of the allocated or alternative sites"</p> <p>This section is extraordinary. Breaking it down we see that:</p> <ul style="list-style-type: none"> - this site is readily accessible. - the site is not in a Settlement Gap - it performs "moderately" in terms of accessibility to facilities and services. According to the rest of the WCC evidence base, it performs better, in terms of accessibility to facilities and services, than site 277. - it performs "moderately" in terms of landscape impact. According to the rest of the WCC evidence base, it does not contain any land that has been identified as being "most sensitive". Site 277, on the other hand, uses a large amount of "most sensitive" land. - it performs "moderately" on community views. How have WCC judged this? How do they justify this statement? <p>Feedback on the Draft LPP2 plan indicated that this site</p>		

SA Report Reference	Comment	Response	Action Required
	<p>was an extremely popular choice within the local community.</p> <p>There are then mentions of it performing "poorly" on all other criteria. What other criteria? It doesn't involve the loss of high grade agricultural land (unlike site 277). It doesn't necessitate a loss of employment space (unlike the sites included within policy NA2). It's located directly opposite the secondary school. It's the closest site to the town's main sports facilities (which are presently at Perins School and at the Alresford Recreation Centre, which the site adjoins).</p> <p>The Sustainability Appraisal isn't simply required to demonstrate that a plan has been judged against reasonable alternatives. It's also required to demonstrate that those reasonable alternatives have been judged on the same basis. The "cherry picking" of data within the SA is extraordinary. It does not look as though the SA is legally compliant as a result and it calls into question the entire site selection process.</p>		
Mr Nigel Evans (51917)			
Consultation	<p>The Sustainability Appraisal is intended to included a Strategic Environmental Assessment and it's my understanding that there is particular legislation in place that directs the preparation of these documents.</p> <p>In particular, the Sustainability Appraisal (SA) should allow for regular involvement throughout the plan making process. This has not been the case in the case of Winchester's Local Plan Part 2.</p> <p>There was no notification, for example, to indicate that the SA was available for consultation at the Draft stage of the process. As a result, only 9 individuals were recorded as</p>	Noted. The SA has been part of all consultation documents at Draft Plan stage and Pre-Submission stages - all iterations are on the Council's web site including the initial SA of sites in the settlements.	No further action is required.

SA Report Reference	Comment	Response	Action Required
	<p>having responded to that stage of the process, although more than 1,000 responses were received that related to the draft version of Local Plan Part 2.</p> <p>Reading through the LPP2 responses, it soon becomes evident that numerous respondents commented on elements that related to the SA. Unfortunately, they weren't aware that the SA was available for consultation and hence could not have realised that they were able to comment upon it.</p> <p>The City Council should have carried out an adequate consultation exercise. They should have used the SA to inform plan making too, rather than 'tacking it on' at the end of the process.</p> <p>Where comments were received that related to the SA of the Draft plan, those comments should have been collated and used to update the SA. Instead, they were ignored. As a result of this, the SA is littered with errors, many of which were raised at an earlier stage but have not been dealt with by the planning authority.</p> <p>A Local Plan is required to have an up to date and relevant evidence base. No such evidence base is in place here because the SA has not been prepared in the required manner. Neither has it been used to inform the plan.</p>		
Russell Eldred (51198)			
	<p>The Sustainability Appraisal fails to include all sites that have actually been allocated within New Alresford. In addition, reasonable alternatives have been ignored. If</p>	<p>Noted. Please refer to responses to the Alresford Professional Group above.</p>	<p>No further action is required.</p>

SA Report Reference	Comment	Response	Action Required
	unavailable sites at The Dean (with no hope of being delivered) have been included, then on what basis have sites at Prospect Road been ignored? There should be a consideration of reasonable alternatives that is objective and clear.		
Margaret Thomas (51919)			
Consultation	The Sustainability Appraisal has been incredibly difficult to track down; every effort appears to have been made to block Alresford residents from reviewing it.	Noted and disagree. SA Reports have been published alongside the emerging LPP2 at each key stage of plan-making. This includes the Pre-Submission SA Report (Sept 2015), which was available online alongside the Pre-Submission LPP2 for public consultation from 6 November to 21 December 2015.	No further action is required.
Appendix VI	It's easy to see why: the document is riddled with errors. It includes statements to suggest that site 277 is within 400m of a bus stop - it's not: it is more than a kilometre away from the nearest bus stop. That error completely skews the supposed sustainability of the site.		
Appendix VI	The only "updated" major constraint against site 2552 suggests that it's development would result in the loss of a sports pitch. How could it? There is no sports pitch on the site and there never has been.	Noted. The appraisal will be amended as part of the iterative and on-going SA process.	Appendix VI will be updated to reflect this comment.
Appendix VI	The SA doesn't even include a number of the allocated sites at The Dean. It also excludes reasonable alternatives, including those at Sun Lane.	All reasonable site options were considered through the SA process with summary findings presented in Section 4 and detailed matrices provided in Appendix VI and VIII of the Pre-Submission SA Report (September 2015). The findings of the SA for LPP2 as a whole, including policies and allocated sites, is set out in Sections 5 and 6 of the same Report.	No further action is required.
Appendix VI	It includes statements regarding Sun Lane replacing lost	Noted and disagree. The baseline information	No further

SA Report Reference	Comment	Response	Action Required
& Consultation	commercial space, but provides no baseline economic data. These statements simply cannot be supported. The SA has not previously been put out for consultation and has not informed the process.	has been updated regularly as part of the iterative SA process. Please refer to Section 3 of the Pre-Submission SA Report (Sept 2015). SA Reports have accompanied the LPP2 on public consultation at each stage of plan-making. This includes the Pre-Submission SA Report (Sept 2015), which was available online alongside the Pre-Submission LPP2 for public consultation from 6 November to 21 December 2015. Any responses received and how they were taken into account were presented in Appendix II of the Pre-Submission SA Report (September 2015).	action is required.
Site 277	Finally, in economic terms, it doesn't address the financial costs associated with the 15 hectare open space allocation at Sun Lane. How is this to be maintained? Have New Alresford Town Council supported the plan and confirmed that it is affordable for them to pay for a 150% increase in managed open space, with the population expected to rise by around 20% during the plan period?	Noted, this is primarily a matter for plan-making.	No further action is required.
Emma Torode (51335)			
General	The SA directly contradicts much of the evidence base. For example: - it is stated that the Sun Lane site is within 400 metres of the nearest bus stop - the supposed classification of the Arlebury Park site as "parkland" is dismissed as a minor constraint within the SA, but is given by WCC as a core reason for rejecting the site - the loss of farmland at Sun Lane is considered to be a major constraint within the SA and one that cannot be	Option noted.	No further action is required.

SA Report Reference	Comment	Response	Action Required
	mitigated against. It's largely ignored within the rest of the evidence base. - the APG plan scores well within the SA, with it being noted that dispersing development would help to disperse traffic. The Systra report attempts to claim that the opposite would be true.		
Gary Jackson (Space Strategy) (52011)			
Alternatives	A dispersal of housing sites around Colden Common, with a much reduced Sandyfields (say 50 to 100 units, if any) would lead to a sound outcome which is far more sustainable. There are reasonable alternatives to 275, particularly 1871 and 2561, which have not been fully assessed by the Sustainability Appraisal, and the level of engagement offered to us by the City cannot be described as "meaningful". In fact, the City has been positively obstructive.	Noted and disagree. All reasonable site options, including site 1871 & 2561, were considered through the SA process with summary findings presented in Section 4 and detailed matrices provided in Appendix VI and VIII of the Pre-Submission SA Report (September 2015). SA Reports have accompanied the LPP2 on public consultation at each stage of plan-making. Any responses received and how they were taken into account were presented in Appendix II of the Pre-Submission SA Report (September 2015).	No further action is required.
Appendix VI	On the evidence we have provided, there are no site capacity, landscape, ecology, arboriculture, heritage, archaeology, drainage, flood risk or transportation constraints associated with the development of 1871 and/or 2561 – see appended consultant reports. • SpaceStrategy - LP2 - Design Statement 1871 & 2651 _ FINAL • SpaceStrategy - Colden (LP2 13) 1871A • Drainage strategy dated December 2015 • Flood Risk Assessment dated December 2015 • R03-TB-ID-SGH Transport Statement (05 12 14) with Appendices • Phase 1 habitat Survey - Colden Common	Noted. Please refer to Appendix VI of the Pre-Submission SA Report (September 2015).	No further action is required.

SA Report Reference	Comment	Response	Action Required
	<ul style="list-style-type: none"> 770289 Colden Common, Winchester - Heritage DBA LVIA, submitted under separate cover by Mr Paul Cordle 		
Stuart Jones (51096)			
Appendix VI	Revise the Sustainability Appraisal to fully take account of the previous feedback and the sensitivity of the Tollgate site southern section. The Plan would then be sustainable, justified and effective for this area.	Noted.	No further action is required.
Historic England (50084)			
Appendix VI	<p>KW1 (365), CC1 (275)</p> <p>We do not agree with the conclusion of the SA that the impact on heritage would be neutral – at best it is unknown at this stage, at worst it would be a negative impact. If the assessment demonstrated that the development of this site would have an unavoidable and unacceptable impact on the archaeological significance of the site, the development would be contrary to Policies CP20 and DS1, but they would not provide any protection; the allocation would remain.</p>	Noted. The SA recognises that there is the potential for negative effects. After taking mitigation into account it concludes that there is the potential for a residual neutral effect.	No further action is required.
Appendix VI	<p>BW1 (2398, 2519), BW2 (284), BW4 (1877, 2390, 2554), BW5 (2520)</p> <p>The SA fails to adequately recognise the historic significance of the Palace, Deer Park and Park Lug and potential effects on these heritage assets from the proposed development.</p>	Noted and disagree. The appraisal in Appendix VI states that, <i>"Furthermore, a number of sites are within close proximity to the scheduled monument of Bishops Waltham Palace and associated fishponds and therefore could have a minor negative effect on its setting. Protection/ mitigation for all heritage assets is provided by policies CP20 – Heritage and Landscape Character and DS1 – Development Strategy and Principles. This should reduce/ prevent any negative effects"</i> .	No further action is required.

SA Report Reference	Comment	Response	Action Required
		It is noted that HE are only proposing minor changes to the wording of the policies	
Appendix VI	We are not clear if sites 2552 and 2532 are those off Sun Lane, but if not, we do not agree with the conclusion of the SA that the impact on heritage would be neutral – at best it is unknown at this stage, at worst it would be a negative impact. If the assessment demonstrated that the development of this site would have an unavoidable and unacceptable impact on the archaeological significance of the site, the development would be contrary to Policies CP20 and DS1, but they would not provide any protection; the allocation would remain.	Noted. The SA recognises that there is the potential for residual minor negative effects on heritage as a result of development at these site.	No further action is required.
Appendix VI	SW1 (340, 2464, 2505, 2593) We do not agree with the conclusion of the SA that the impact on heritage would be neutral – at best it is unknown at this stage, at worst it would be a negative impact. If the assessment demonstrated that the development of this site would have an unavoidable and unacceptable impact on the archaeological significance of the site, the development would be contrary to Policies CP20 and DS1, but they would not provide any protection; the allocation would remain.	Noted and disagree. The SA states that there are no conservation areas or scheduled monuments on or adjacent to the site options. It is considered that mitigation provided through LPP1 and LPP2 policies and available at the project level is sufficient to ensure that there will not be any negative effects of significance.	No further action is required.
Appendix VI	WK3 (2438) We would have expected the SA to identify potential negative effects for heritage from the allocation of this site, mitigated by the inclusion of the requirement for the investigation of the archaeology of the whole site.	Noted. The SA identifies that development at the site has the potential to affect the setting of listed buildings given its proximity. However, it concludes that protection/ mitigation for all heritage assets are provided by policies CP20 – Heritage and Landscape Character; and DS1 – Development Strategy and Principles. Project level studies would identify the presence of any important archaeology.	No further action is required.

