

# Micheldever Station

Responses to Winchester District Local Plan  
Reg.18 Consultation

Fact Sheet

## Introduction and Vision

### SP1 – Vision and objectives

#### Do you support the approach in the policy?

- *Neither support or object*

*If no, please explain how this policy should be amended?*

The spatial planning vision notes the unique cultural and historic assets from which the area benefits, and explains that new development will address the needs of the area and respond to the wider relationship with neighbouring areas (e.g. Urban South Hampshire). This vision is supported, but is fundamentally not something the plan actually then delivers upon. The vision also lends support for net-zero carbon development and the concept of 15-minute neighbourhoods, active travel and connecting development to public transport, which again is supported, but its proposed allocation of sites for development acts directly against that.

The vision sets out the aspirations for the County Town of Winchester, the market towns and villages and the areas in the south. In particular it sets out that “significant housing and employment development will be delivered in the south”. This approach risks creating an unbalanced strategy, with parts of the south some of the most sensitive to continued urban change, creating dormitory settlements for the South Hampshire Urban Areas and risking coalescence of individual communities. The Council should recognise that whilst areas in the south including Whiteley and West of Waterlooville may continue to grow forming part of the wider South Hampshire economy, this should not be a pretext for using the south as a sponge to mop-up development needs from the rest of the District. There is still a need for the areas in the north of the District to take a proportionate and well planned share of the development, particularly housing, when in fact the Council is expecting areas

in the south to meet needs that arise in the centre and north of the District (something directly acknowledged by the PfSH Statement of Common Ground) and it is making zero contribution to unmet needs from the rest of South Hampshire.

Therefore, our concerns remain that whilst the principles of the vision may in principle be supported, the vision should have a wider outlook than just Winchester District, and needs to consider the strategic context, and the role Winchester has in delivering growth as part of a wider sub regional group.

The objectives around the climate emergency, living well, homes for all and a vibrant local economy are laudable, but is meaningless if the strategy does not act directly upon them; this needs to be supported and carried through into the spatial strategy and plan for growth, with – in our view – a significant disconnect between these objectives and what the plan actually goes on to provide, which demonstrably will not provide “homes for all” (given 20,000 homes of unmet need across South Hampshire) nor properly address the climate emergency, with a significant risk of the strategy simply encouraging car dependent development.

# Introduction and Vision

## SP2 – Spatial strategy and development principles

### Do you support the approach in the policy?

- *No, we object the policy*

*If no, please explain how this policy should be amended?*

Plans should be positively prepared providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs and be informed by agreements with other authorities so that unmet needs can be accommodated (NPPF Paragraph 35a). The draft Reg.18 plan makes provision to meet the area's local housing need; however, it does not specifically plan to address any of the unmet needs arising from the 'Partnership for South Hampshire' (PfSH) area (which includes some of southern Winchester district). In addition, the evidence base informing Policy SP2 – principally the latest 'Integrated Impact Assessment' (IIA) – similarly does not address the increased level of unmet needs across the PfSH area and the implications for testing options and the sustainability of the plan.

Policy SP2 states that the 'South Hampshire Urban Areas' of Winchester will make provision for 5,700 new homes and contribute towards meeting the PfSH's strategy primarily by providing major housing growth. While we agree that developments in this area – alongside other developments in the wider southern PfSH area of Winchester, e.g. proposed developments in Bishops Waltham – could contribute to meeting the needs of the PfSH, in actuality all growth in this area is being counted against meeting Winchester district's local housing need. The plan therefore fails to address the PfSH's unmet needs adequately. This includes an inbuilt assumption within the housing distribution in Policy SP2 that the South Hampshire part of the District (with needs of c.3,400 homes, as referenced in the PfSH Statement of Common Ground 2022, but provision of c.7,000+ homes in this area) is meeting some needs associated with the north of the district demonstrating an acceptance in the strategy that needs from the north can be met in the south (and tacitly vice versa) which is understandable as Winchester district is wholly part of a single interlinked housing market.

Moreover, there has been a material and significant rise in the PfSH's wider unmet housing need since the plan's spatial strategy and its supporting evidence base were drafted. The most recent assessment of these unmet needs shows that it has risen from

13,000 homes in 2021 to 20,000 in 2022 as per the new PfSH 'Statement of Common Ground 2022' (30th November 2022) and it is reported that – as yet undefined - additional Strategic Development Opportunity Areas (SDOAs) within the South Hampshire area will not be sufficient to address all of these unmet needs. This change materially affects the context within which spatial strategy needs to be considered and this level of need is not reflected in the plan strategy nor the IIA which does not test options of Winchester meeting any level of unmet need.

The Council will need to consider, with its neighbouring authorities, how much of the PfSH's unmet housing need it could accommodate and how that influences the spatial strategy. This figure will need to be determined through both updated evidence – including an updated IIA which tests new reasonable alternative options for growth – and ongoing constructive engagement with the PfSH; discharging the Council's duty to cooperate (noting the Sevenoaks and Tonbridge & Malling examinations whereby the Local Plans submitted were found to fail the duty to cooperate on this point). Policy SP2 will need to change to define the number of homes Winchester district will contribute to ameliorate, insofar as is reasonable and sustainable, the unmet needs of the PfSH and the overall spatial strategy for doing so.

The consequential changes of doing the above will more than likely mean that the plan will need to deliver a greater number of homes outside the southern areas of the district in the PfSH. This is to free up those developments in that part of the district to count towards meeting the PfSH's unmet need, while also achieving a balanced spatial distribution across the district as a whole.

The above is important, as the Council to date has only consulted on spatial strategy options absent any consideration of unmet needs and absent any specific development sites and strategy attached to those needs. Whilst the Council's preferred spatial strategy is substantively based on 'Approach 1' of distributing development to the existing hierarchy of settlements (i.e. a more of the same approach) this was only the in the context that the Council at the time indicated it only needed to deliver modest additional development. Indeed, the apparent rejection of Approach 3 around new strategic allocations or new settlements as an option:

# Introduction and Vision

## SP2 – Spatial strategy and development principles (continued)

1 Appears to have arisen out of a deeply unpopular strategic site (now no longer being promoted) to the South West of Winchester which attracted significant objection to 'Approach 3', whilst Approaches 1, 2 and 4 did not have any equivalent specific sites or locations being linked to their spatial strategy approaches (therefore not garnering any strength of negative response).

2 Has been founded on generic and unevidenced criticisms of this form of development, which would be equally (if not more so) applicable to the sum of the same level of development under a more distributed/dispersed strategy (e.g. need for greenfield land, creating car dependency, embedded carbon from development etc.). A new town the size of Petersfield or Romsey, or similar in conception to that being built at Welborne Garden Village, would undoubtedly be a sustainable strategy for growth.

3 Would also appear to preclude the approach of Strategic Development Opportunity Areas as a means to act as a part solution within Winchester to the now substantial unmet need that exists in the South Hampshire Urban Area. If SDOAs are to become part of the strategy in the future – and the indications from PfSH is that they will – this would run counter to the Council's emerging strategy, disproportionately place growth in the southern parishes (e.g. 5,000-6,000 more homes on top of the already 5,700 planned for meeting the District's growth) leading to a hugely unbalanced strategy, and would require a step back to re-assess the spatial strategy for the whole of the District.

Furthermore, the spatial strategy appears to fundamentally run counter to the objectives around climate change and addressing the Climate Emergency (see our response on CN1).

# Carbon Neutrality and Designing for Low Carbon Infrastructure

## CN1 – Mitigating and adapting to climate change

### Do you support the approach in the policy?

- *No, I object the policy*

*If no, please explain how this policy should be amended?*

The importance of climate change is such that the City Council declared a climate emergency, and consequently produced the Carbon Neutrality Action Plan to support the Council's objective of ensuring that new development is designed in a way to adapt to the challenges of climate change.

We agree with the Council's assertion that the Local Plan has a role to play in reducing the carbon footprint of the district and ensuring that new development is directed towards areas where existing sustainable infrastructure is located. It is imperative that in order for the Local Plan to achieve this, that the Council delivers objectives around good growth which addresses carbon emissions. In this regard transport is recognised as one of the highest contributors

towards the carbon footprint of the district which is evidenced within the Carbon Neutrality Action Plan produced in 2020. Statistics produced in this report (sourced to WinAcc) indicated that of the 629,000 tonnes of CO<sub>2</sub> produced across the District, 287,000 of these were related to transport. Of particular note, and a direct reference to the reliance on private car use, is that a further 205,000 tonnes of CO<sub>2</sub>s was produced if motorway emissions are included, with the Council stating that they will focus on measures that reduce the need to travel by car.

Therefore, whilst the requirements for active travel to be encouraged within new developments and the advocacy for reducing the need to travel such as the introduction of super-fast fibre broadband are all encouraged, there is a requirement for a fundamental shift in Winchester's approach to the location of development, and how new development can be utilised to make best use of Winchester's existing public transport infrastructure. It is imperative that the Local Plan spatial strategy, and therefore consequentially the allocations arising, minimise the

# Carbon Neutrality and Designing for Low Carbon Infrastructure

## CN1 – Mitigating and adapting to climate change (continued)

reliance on car usage. For example, any new homes in any location across Winchester can introduce in-built low carbon solutions, but the factor that will govern what impact they have on ultimately have on climate change within the District will be how people behave and how they travel to places of work or leisure.

The location of development and spatial strategy is therefore one of the greatest contributory factors as to whether the local plan will achieve this reduction in private vehicle use and is identified specifically under IIA Objective 2: “To reduce the need to travel by private vehicle in the District and improve air quality”

The Integrated Impact Assessment (IIA) references baseline evidence on ‘climate change mitigation and adaptation’ (Appendix D). However, this is related to the ‘as-is’ situation across the district and provides little context for estimating the future nature of how individual development proposals might affect carbon emissions.

Sustainable modes of transport, and the ability to incentivise and drive change in transport behaviour (shifting trips away from the car) should be intrinsic into the identification of new development sites. A generally more dispersed and sub-urban development strategy, adding bits of development onto the edge of many existing locations as in significant proposed by the Local Plan, will not address the climate emergency in the district, and will demonstrably result in greater car reliance. This can be seen in the Census data (2011) where dispersed development around Waterlooville and Whiteley have a travel to work method that is heavily weighted towards the private car/van (52% and 54% respectively compared to denser town style development around a train station.

Indeed Census 2011 travel to work data (Census Table QS701EW) shows that for the types of ‘built up areas’ in the south of the District where allocations and much of the growth in the Plan is proposed, only between 12-15% of employed people travelling to work will use active modes (walking/cycling) or public transport (train/bus), including Bishops Waltham (14%), Denmead (12%), Knowle (8%), Horndean/Waterlooville (13%) and Whiteley (15%). This can be compared with what is likely to be achieved in a town centred around a railway station (as Micheldever Station would be) where rates of active/public transport travel would be around 30%, like in Petersfield. It is also notable that even the Micheldever built-up-area covering the

existing village has an active/public transport share of 20%, the majority of that (15%) associated with train travel. That illustrates how development better connected to transport nodes can fundamentally influence travel modes and contribute to reducing carbon emissions. In short, a mixed-use and compact settlement centred around a train station is twice as likely to have residents commuting by active or public transport modes, than the equivalent growth provided as many ‘bolt-ons’ to the edge of existing smaller settlements without the benefit of that infrastructure and choice of travel options.

Micheldever railway station is located on the south west main line, with trains directly into London Waterloo, calling at significant areas of employment such as Basingstoke and Woking with trains operating south stopping at Winchester and Portsmouth. The Council should seek to achieve a far more efficient use of the railway station at Micheldever, which should seemingly be providing a far greater option for those close by to commute from than the use of private car transport.

Surprisingly, despite our proposals at Land at Micheldever Station (MI04) seeking to deliver housing centred around the existing train station, the IIA currently considers that the proposals would have a minor negative impact against the aims of IIA Objective 2. The justification advanced for this within the IIA Appendices states that the appraisal criteria are the same as shown under the SA objective 1: greenhouse gas emissions which are associated with travel. It is unclear how this consideration can be accurate, given that a new development, delivering a joined up active travel approach, focussed on enabling the use of public transport and discouraging private car use would result in a lesser impact than the equivalent allocation of a site to an existing smaller settlement. The delivery of our Micheldever Station scheme would also result in improvements to the rail network, with increased level of services and enhancements to the station itself. This appears to be a fundamental shortcoming of the IIA, which fails to consider what modal share of transport could occur and the consequent impact on climate change objectives.

In our view, and supported by evidence on travel patterns, the Council’s current spatial strategy would prevent it from delivering the objectives set out under this policy in respect of mitigating climate change.

# Carbon Neutrality and Designing for Low Carbon Infrastructure

CN1 – Mitigating and adapting to climate change (continued)

Instead of seeking to reduce the need to travel by private car as a first step in the Plan, this policy instead relies on making good shortcomings in the location of new development by placing stringent (and still welcome) standards on the quality, form and carbon credentials of new buildings. In order to best achieve this objective, the Council needs to identify locations - such as Micheldever Station - that can

truly deliver principles around sustainable transport at its core, promoting a step change away from private transport by car, as well as then requiring residual measures such as low carbon energy, building design and electric charging points (among others). The latter without the former will not address the climate emergency.

## High Quality Place and Living Well

D1 – High Quality, well designed and inclusive places

### Do you support the approach in the policy?

- *Yes, I support the policy*

*If no, please explain how this policy should be amended?*

The desire for a high-quality public realm incorporated into design processes for new developments is

supported, and it will be important that developments respond to the local character and existing identity of the area.

Proposals for new development measures to minimise carbon emissions should be required, and in this regard, support is given to part iv of the policy which encourages proposals to connect green/blue infrastructure, accessible cycling, and walking routes to local services and active travel considerations.

## Promoting Sustainable Transport and Active Travel

T1 – Sustainable and Active Transport and Travel

### Do you support the approach in the policy?

- *I neither support or object*

*If no, please explain how this policy should be amended?*

Policy T1 proposed the need for planning applications to design development that minimises the need to travel by private car, and prioritise sustainable and active transport modes. Parts (iii) and (iv) of the policy

in particular consider the need to explore the concept of a 15 minute neighbourhood and the incorporation of sustainable travel routes with connections to the wider network and are usable at all stages of development.

Whilst we support the ambition of the policy in pursuing these sustainable transport principles, it is unclear how the current spatial strategy supports these aims. The spatial strategy identifies a dispersed, sub-urban development strategy, which seeks to place development on the edge of existing locations. However, this intrinsically limits the ability of these

# Promoting Sustainable Transport and Active Travel

## T1 – Sustainable and Active Transport and Travel (continued)

areas to provide a ground up approach to delivering active transport networks and establishing the most efficient way of delivering these, as the sites effectively form a ‘tack on’ to existing sites which will inevitably lead to a greater reliance on car use.

If the Council wishes to make the best use of the extant wider network, the Council should seek to identify strategic locations such as Micheldever Station which have a unique locational advantage with the presence of a railway station. The presence of such a strong public transport link enables the ability

to plan from an early stage how best to incorporate sustainable transport at their core, and how to integrate that within a wider public transport focus, and promote a step change from private transport by car.

The importance of doing so was highlighted in the removal of the Fair Oak Strategic Growth Option (SGO) from the Eastleigh Local Plan at the recommendation of the Inspector, who noted that the SGO would result in longest average travel distances by car, over and above other feasible development options which was seen as a ‘fundamental drawback’.

# Homes for All

## H1 – Housing provision

### Do you support the approach in the policy?

- *No, I object the policy*

*If no, please explain how this policy should be amended?*

Policy H1 identifies that provision will be made for 15,620 homes to 2039. This is based on the below elements of housing need as per Table H2:

1 14,178 homes – the districts local housing need calculated using the standard method, as per Table H1; and

2 1,450 homes – an additional ‘buffer’ to account for changes to the standard method and/or unmet need from neighbouring authorities.

While Policy H1 purports to plan to meet the districts local housing need (albeit that element of requirement has been miscalculated – see below), it does not make a defined contribution to meeting unmet needs arising from the PfSH area.

Firstly, the Council’s local housing need element is not calculated in accordance with policy and guidance. Paragraph 61 of the NPPF (2021) states that to determine the minimum number of homes needed strategic policies should be informed by a

local housing need assessment, conducted using the standard method in planning practice guidance (PPG). The method provides authorities with an annual number which can be applied to the “whole” plan period (PPG ID: 2a-012) and it should be calculated using the latest inputs (PPG ID: 2a-005). It is recognised that during plan-making the figure the method outputs may change. Any changes will need to be considered and it is only once the plan is submitted that a specific figure can be relied upon for a period of up to two years (ID: 2a-008).

The Council’s approach to calculating its local housing need – detailed in Table H1 – is to apply older standard method figures to specific years in the past rather than apply the current figure to the whole plan period. If the current standard method figure were applied to the 20-year plan period, the district’s local housing need element would be 14,300 homes, not the 14,178 homes identified.

Secondly, while there is a recognition in Policy H1’s supporting text that there are unmet needs arising from the PfSH, and that the Council should contribute to meeting those needs (Paragraph 9.15), the policy itself does not identify a specific contribution within the housing requirement. While there is a ‘buffer’ of 1,450 homes added to the district’s local housing need to arrive at the housing requirement this is not sufficient because:

# Homes for All

## H1 – Housing provision (continued)

- The policy does not define this buffer as contributing to meeting those unmet needs; and
- The buffer is included not only to potentially contribute to the PfSHs unmet need but also to account for potential changes in the districts own standard method figure.

Therefore, the true contribution from Winchester to meeting PfSHs unmet need not established. For example, based on our amends to the local housing need element, at most 1,328 homes could notionally contribute to meeting the PfSHs unmet needs, but as the Plan is currently drafted, this is actually zero.

There is no assessment demonstrating that the 1,450-home buffer is a reasonable and justified figure if it were there to only contribute to meeting the PfSHs unmet need. Indeed, the unmet need figure has recently risen from 13,000 to 20,000 homes in the space of a year as identified in the PfSH's 'Statement of Common Ground 2022' (30th November 2022). The unmet need problem has increased in part because Winchester City Council has 1,859 homes that were previously attributed to unmet need in the 2021 Statement of Common Ground (this is from sites immediately contiguous with urban south Hampshire) that are now being offset against needs generated outside the PfSH area, in the centre and north of the

district. The PfSH currently assumes that Winchester makes zero contribution to unmet need from the rest of the PfSH area.

Winchester now makes no contribution within the PfSH Statement of Common Ground to unmet need, with this clarified in footnote 24 of the SoCG 2022 which against a need for 3,402 homes in the PfSH part of Winchester District (i.e. excluding any unmet needs) notes "The actual supply within the PfSH part of the District is higher than 3,402. This is because Winchester does not have a split in its adopted Local Plan between PfSH and the rest of the District, meaning that the figures for need and supply are estimated to be the same in this table. This may change as Winchester's local plan progresses."

To be positively prepared and justified, and further to discharge the Duty-to-Cooperate which requires constructive, active and ongoing co-operation on matters including unmet need, the Council need to re-consider its approach to setting its housing requirement in the context of the latest assessment of unmet needs from the PfSH area. The concluded contribution should then be specified in policy H1 as a separate requirement, with the potential impact that it could increase the housing requirement in the District by several thousand additional homes.

# Homes for All

## H2 – Housing phasing and supply

### Do you support the approach in the policy?

- **No, I object the policy**

*If no, please explain how this policy should be amended?*

LPAs are required to identify a sufficient supply of sites (NPPF Paragraph 68). Table H2 sets out that against a total housing requirement of 15,628 homes, a total supply of 15,629 homes has been identified. Given our representations in respect of Policies SP2 and H1, the total number of dwellings to be provided over the plan period (set out in Policy H2) is not sufficient.

The plan will need to be updated to re-evaluate and specify its contribution to meeting unmet needs arising from the PfSH. In doing so, the overall number of homes that will need to be delivered through this plan will likely increase. This is because:

- The plan will need to need identify specific sites – likely those that are already allocated within the southern PfSH areas of the district – to meet Winchester's contribution to the PfSH's unmet needs. This is likely to be in excess of the 1,450-need buffer currently identified as potentially contributing to those unmet needs.
- Following this, the plan will need to identify

# Homes for All

## H2 – Housing phasing and supply (continued)

additional sites to meet the district's own housing needs, separate to the sites contributing to the PfSH.

Furthermore, the Council should identify an additional buffer of sites above any updated housing requirement to account for the late or non-delivery of sites. This would help to ensure planned levels of housing need are met. Currently, the Council only identifies a buffer of one single dwelling against its stated housing requirement (which will need revisiting in any case).

The justification for this is that less than 25% of the housing provision is from sites without planning consent (not including the windfall allowance). Therefore, the risk of non-delivery early in the plan period is less and if issues do arise future plan reviews can address this issue. This approach is not a justified or effective strategy to meeting overall housing needs for the following reasons:

- The number of homes that need to be delivered in Winchester district is likely to be higher than currently planned for given the increased scale (20,000 homes) of unmet need in the PfSH area. To meet a higher level of unmet need alongside the district's local housing need will require additional allocations. This will increase the proportion of supply without a planning permission;

- In the same context, a large proportion of the supply with planning permission is from sites in the south of the district: i.e. West of Waterlooville. This is principally where any sites allocated towards directly meeting the PfSH unmet need would be located. Once these are identified as meeting the PfSHs unmet needs, the proportion of sites with permission to meet Winchester's need will decrease as a proportion; and

- There is uncertainty as to the delivery of some sites in the trajectory; for example, the John Moore Barracks site (which is largely undeveloped open countryside, with only small elements of brownfield). Its closure as an MOD site has repeatedly been pushed back – from 2021 originally to 2026 now – and Masterplanning is still ongoing which will determine whether it can deliver 900 homes as allocated. Given the site is going to be in active use to 2026, with no guarantee that date will not be pushed back further, it is increasingly unlikely all 900 homes will be delivered by 2039. Delays to this or other sites would result in the plan not delivering the required amount of housing.

Overall, the plan should re-evaluate its position on housing supply given the need to plan for additional and specific level of unmet need as well as providing a sufficient buffer for non-delivery. There are site options available to the Council to achieve both in the north areas of the district such as 'Land at Micheldever Station' being promoted by O'Flynn. This will need to be tested in an updated IIA report.

# Homes for All

## H3 – Spatial housing distribution

### Do you support the approach in the policy?

- *No, I object the policy*

*If no, please explain how this policy should be amended?*

Paragraph 60 of the NPPF (2021) states it is important that a sufficient amount and variety of land can come forward where it is needed. Reviewing the Reg.18 plan, the current distribution and allocation of housing growth does not achieve this, and its spatial distribution of homes is unjustified.

In the context of Winchester district, there are wider unmet needs arising from the PfSH area. The southern parts of the district that fall within the PfSH are set to deliver at least 7,823 homes: 50% of the overall housing proposed to 2039. This is despite this area representing c.30% of the district's current population and c.19% of its area. Of the remaining proposed development, 38% is planned in Winchester (including nearby Kings Worthy) with a further 3% is planned in the South Downs National Park. This leaves only modest growth in the northern areas of the district outside of Winchester and the national park. The PfSH Statement of Common Ground advises that 1,859 homes that were previously

# Homes for All

## H3 – Spatial housing distribution (continued)

attributed to South Hampshire's unmet need in the 2021 Statement of Common Ground (this is from sites immediately contiguous with urban south Hampshire) are now being offset against needs generated outside the PfSH area, in the centre and north of the district. What this demonstrates is that the Council believes there is a housing market fluidity between development in the PfSH part of the district and needs in the centre and north. It follows that development in the centre and north could equally help meet needs arising in the PfSH area.

In reality, it is likely a sizeable portion of the development within the southern PfSH area of Winchester district will need to be allocated to

meeting its unmet needs rather than Winchester's through the duty to cooperate. It could also be that additional development is needed here to meet the PfSHs most recent assessment of its unmet need having increased from 13,000 to 20,000 homes in the space of a year. This will mean that additional homes are needed elsewhere in the district to both meet Winchester's own local housing need and achieve a balanced pattern of growth.

For example, the Council could allocate Micheldever Station in the north of the district to meet its own needs, freeing up sites in the south to be allocated to the PfSHs unmet needs. The Council has not actively explored this option or shown it not to be a sustainable way of meeting housing needs.

## Evidence Base

### Integrated Impact Assessment (IIA)

*If you would like to make a comment about the evidence base, please do so in the space provided below. Please include the page number and paragraph that you are referring to:*

Reviewing the IIA, it does not adequately test reasonable alternatives, does not address the increasing levels of unmet need arising from the PfSH area (and the consequent impact that has on the sustainability of any spatial strategy), and does not adequately assess potential sites.

With regards to its testing of reasonable alternatives – which informs the plan's spatial strategy (see our response to Policy SP2) – the IIA only tests options of meeting either 14,000 homes in three scenarios (which is below the district's local housing need) or 15,620 homes in one other scenario (Table 4.1). There is no consideration of delivering different levels of housing growth above purely the local housing need to provide for different levels of unmet need arising from the PfSH as well as a buffer for non-delivery.

Given this, all the different options do is test how roughly the same number of homes could be delivered spatially within in the district; not accounting for local

unmet needs which are significant. Therefore, these options do not provide reasonable alternatives to base a spatial strategy on.

As identified in our earlier comments to Policy CN1 regarding the conclusions of MI04 – Land at Micheldever Station, it is considered that the findings of the IIA regarding this site have not considered the site fairly, accurately or consistent with the remainder of the IIA evidence.

IIA Objective 1 states that:

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

The score assigned to MI04 is that the proposal would result in a minor negative. However, the justification for this score is that the site is not within 1,200m of a GP surgery or a primary school, over 2,000m from a secondary school and would result in the loss of open space. Clearly any development at a strategic scale on this site would include delivery of new GP surgeries and schools, as well as the provision of new areas of publicly accessible open space and open-up routes into the countryside which would be more usable for members of the public than the currently largely



# Evidence Base

## Integrated Impact Assessment (IIA) (continued)

inaccessible private land. Further, concerns raised that the majority of the site would have an average commuting distance that is 81-100% range for the plan area would also be alleviated and clearly offset by the availability of public transport links (both existing and upgraded) from new development in this location and also the provision of local employment opportunities. In this regard the IIA's methodology wholly fails to address

IIA Objective 9 also find that the site would have a significant negative impact on the district's biodiversity and geodiversity. Whilst it is noted that the site sits in close proximity to a local wildlife site or ancient woodland, no consideration is given to the delivery of a waste water treatment plant which would utilise effective nitrogen filtering which would in actuality result in a net-positive benefit (i.e. a net reduction in nitrates from the area). Given the nutrient nitrate advice published by Natural England and update from

DLUHC in July 2022, it is considered that the potential to achieve a net benefit on nitrates should be afforded significant weight, and is not something that would result in an overall 'significant negative'.

In the case of the Fair Oak SGO in the aforementioned Eastleigh Local Plan, the Inspector also came to this conclusion regarding the Sustainability appraisal (SA), where it was considered that the SGO alternatives had greater merit in meeting transport/accessibility aims and were more beneficial in terms of protecting settlement gaps. The inaccurate scoring of the SA was one element upon which the Inspector considered that the approach to the site selection of the SGO did not represent a justified and evidence-based approach.

It is therefore considered that the scoring of Micheldever Station is unfounded and does not form a reasonable basis for its exclusion.

