

Appendix C - Consultee Comments

First name	Last name	Are you responding as a member of the public or as a representative of an organisation?	Organisation name	Policy 1 introduces the concept and requirements for both an air quality assessment for larger specified developments and an air quality statement for smaller specified developments. Do you support this approach?	Policy 1 introduces the concept and requirements for both an air quality assessment for larger specified developments and an air quality statement for smaller specified developments. Do you support this approach? - Are there any trigger levels in table 2 you consider inappropriate or missing?	Policy 2 specifies specific receptor sites for consideration, please provide any comment you have regarding these	Policy 3 details the requirements for inclusion within an air quality statement, please provide any comments you have regarding these.	Policy 4 specifies the requirements for an air quality assessment. Please provide any comment on the guidance provided regarding this requirement.	Policy 5 details the expected mitigation required. Please provide any comments you have regarding this approach and the guidance provided.	The policies within the draft air quality SPD only apply to the area marked on the map within Appendix H. Do you consider this is the appropriate area to cover?	The policies within the draft air quality SPD only apply to the area marked on the map within Appendix H. Do you consider this is the appropriate area to cover? If you answered no to the above question, what do you consider would be the appropriate area to cover and why?	Do you support the adoption of this draft air quality supplementary planning document (SPD) as a way to improve the air quality within the Winchester City area?	Do you support the adoption of this draft air quality supplementary planning document (SPD) as a way to improve the air quality within the Winchester City area? - If you answered no to the above question, please explain why?	We would welcome any additional comments you have regarding this proposed air quality SPD that you consider have not been covered by answering the above questions.
Alexander	De-Ville	Member of the public	Not Answered	No			Ridiculous suggestions that will only stifle how new dwellings are built, with loopholes so that they provide less value for money and poorer equipment for the buyers.			No		No	Only sets about to ban things instead of promote the adoption of better practices. Will lead to poorer quality of housing stock to meet regulations instead of bettering them.	
Jeremy	Banks	Member of the public	Not Answered	Yes						No	When you consider the potential of the Royal down proposal moving towards Hursley the SPD should be enhanced to any plans that would significantly impact the Winchester area.	Yes	However rather than just say approach cycle storage it should also incorporate infrastructure - effective pedestrian and cycle paths. Developments should be expected to include this in plans as it forms long term thinking around tackling air quality.	
Patrick	Nixon	Member of the public	Not Answered	Yes	No					Yes		Yes		
Philip	Ross	Member of the public	Not Answered	Yes	No					Yes		No	The document only seems to deal with new builds but makes no mention of road closures or road narrowing which has happened without public consultation. The Hampshire Chronicle gives the impression that they will be part of a public consultation but I can find no information at all.	The document mentions air quality but thus far not any potential resolution. If the plans include road closures or narrowing then there should be specific mention of these otherwise this consultation is worthless. That is presumably what the councillors intended.
Steven	Kan	Member of the public	Not Answered	No	Differentiating between new developments and extensions/changes to existing property.	no comment	Ban on solid fuel appliances is over zealous, given AQMA only applies to part of the area covered by the SPD, and the issue was with NOx emissions and PM emissions are deemed within limits.	no comment	Proactive enforcement is required when measures are agreed.	No	No quantitative evidence is given that air quality issues exist across this area to support the proposed restrictive guidance above & beyond national planning measures.	No	There is a lack of quantitative evidence to support it. Qualitative statements are made against specific numerical targets in the appendices.	

Richard	Peake	Representative of an organisation	Kingsworthy Foundry	Yes			Item 1 - Solid fuel stoves. Dry wood burnt in a modern eco design stove should be considered a positive in this respect. I feel there should be an emphasis on NON Eco Design stoves rather than a blanket 'NO SOLID FUEL DOMESTIC HEATING APPLIANCES'. Locally sourced dry wood burnt on a modern stove is about as carbon neutral a way of heating a property as it gets. Not only do SIA Ecodesign Ready stoves and fireplaces offer benefits in terms of lower emission which			Not Answered		Not Answered		
Jonathan	Driver	Representative of an organisation	Havant Borough Council (Environmental Health)	No	Policy text refers to the IAQM guidance on significance, which permits (i.e. does not strongly support refusal of a development) even where there is expected to be a +10% increase in ambient concentrations within an area that already exceeds an Air Quality limit or Objective at a point of relevant exposure. Given this, requiring assessment at 10 residential units is a very low threshold - within Havant's district, developments of <150 units rarely exceed a 'negligible' impact. I can't comment on how this may translate to WCC's district, but I do note that the later SPD policies allow developers to avoid requirements of the AQS (e.g. provide an EV charge point at each off-road parking space) simply by	I find the terminology used here confusing - the wording "Relevant exposure [is introduced to a] receptor site" implies that "relevant exposure" and "receptor site" are separable - I don't believe that they are functionally different. The wording is unnecessarily distinguishing between the relevant exposure (essentially a person of a given 'class', and relevant exposure duration-) and the type of development (where a person of a given class is assumed to be present & exposed for a given duration). I cannot envisage a scenario where a development could be considered a 'receptor	1 - solid fuel. How will the Council address the exercise of permitted development rights in the operational phase? I would suggest considering removal of specific PDR to secure absence of DSF burning in the long term (without specific planning approval), and/or including a policy provision to cover householder applications for solid fuel appliances. 2 - Cycle Storage. Is it necessary to include this? this is apparently already required by policy 8. 3 - Space / Waster Heating Appliances. Supported in principle,	Guidance on dispersion modelling is given in Appendix D, but this is only referred to in Appendix B. The IAQM guidance referred to is fairly weak on the provision of mitigation (or the level of mitigation) to 'make acceptable' a negative impact of a given magnitude. It is similarly fairly weak on defining a point where development is (without mitigation) 'unacceptable' in planning terms. I'm not sure that this policy adds significantly to the NPPF provision + IAQM guidance; I would suggest developing the requirements to address the weaknesses of the guidance referred to - i.e. to set out clearly the level of mitigation that the Council would expect, or the	The introductory text ("quantify the impact of the development in terms of damage costs..." & "method for assessing mitigation is set out in chapter 8 of [the IAQM Guidance]...") suggests that a method of cost accounting can be found in the IAQM guidance, which is misleading (chapter 8 provides only very general mitigation advice). This text also suggests that the damage costs should be calculated, and then that sum should be used to calculate the level of mitigation required (similar to the Sussex approach, which is good on paper, but has proven to be	Yes		No	I think it should be significantly strengthened. Referring to existing industry guidance undermines it's likely efficacy, and I suspect that it will not yield the expected material improvements without a greater focus on requiring & securing mitigation measures as a routine matter (or against criteria which at least target a 'hold the line' or 'no net increase' policy standard, rather than the 'managed rate of deterioration' approach that is embodied by the IAQM guidance). I would also suggest making links to the synergy between air	No additional comments.
Rachel	Aron	Member of the public	Not Answered	Yes						Yes		Yes		Support this initiative
Michael	Evans	Member of the public	Not Answered	Yes			need more cycle paths to go with other cycle provisions			Yes		Yes		perhaps more smaller shuttle electric buses from out of town car parks and as above more cycle paths and routes to avoid busy roundabouts and traffic lights where most cycle lanes stop and where it is most dangerous
Derek	Morgan	Member of the public	Not Answered	Yes						No	The area is to big, should only be where there is heavy traffic. Traffic Congestion is Winchester's biggest problem. Computerised traffic flow connected to all the traffic lights with the objective of improving flow, will reduce lots of stationary vehicles increasing the pollution.	No	More work needs to be done to ensure that any new regulations have the maximum effect with the minimum of disruption.	
Damien	Carparini	Member of the public	Not Answered	Yes	No	I'm surprised there aren't more sites specified	None	What is the likely cost of completing such an assessment?	How will compliance be monitored and enforced?	Yes		Yes		I would like to know more about how WCC will monitor compliance with requirements and enforce the regulations properly

John	Hayter	Member of the public	Not Answered	Yes	"Other thermal output >1MW is out of date. The (derived from Environmental Protection UK (EPUK) & IAQM guidance, Ref. 11 Appendix K) does not now exist. The criteria are solely emissions based.	None	None	None	None	No	The areas in Winchester City are small. There are areas of similar size & character in the Local Plan area such as The Square Bishops Waltham due to buses, cars & delivery vehicles sometimes waiting with engines running & always when turning. This will now be a Local	No	The areas in Winchester City are small. There are areas of similar size & character in the Local Plan area such as The Square Bishops Waltham due to buses, cars & delivery vehicles sometimes waiting with engines running & always when turning. This will now be a Local	The areas in Winchester City are small. There are areas of similar size & character in the Local Plan area such as The Square Bishops Waltham due to buses, cars & delivery vehicles sometimes waiting with engines running & always when turning. This will now be a Local	
Stuart	Dyne	Member of the public	Not Answered	Yes	Table 2 does not set out trigger levels, it sets out threshold levels at which different requirements apply. It does not appear to be informed by existing air quality levels and there are a paucity of such information throughout the draft SPD.	The criteria for acceptability are too loose so open to interpretation by developers or their experts. For example existing policy DM19 specifies that development will "only be permitted where it achieves and acceptable standard of environmental quality." The problem with this is what is/not acceptable depends on who is asked and what a developer considers acceptable may not be considered acceptable by residents or stakeholders leaving planning decisions vulnerable to the weight and quality of evidence presented in the assessment (Step 4,	Should also include North Walls	OK	OK	OK	Yes	The delimited area does not reflect existing air quality hotspots (which are likely to be focussed on heavily trafficked highways through the district, not just the city of Winchester) so may include areas where air quality is not an issue while excluding other areas where air quality is an issue. A systematic review and stakeholder engagement is needed to address air quality near the A34 including Sutton Scotney, the A33 and M3 including Kings Worthy (especially due to congestion caused by J9 or the M3) and Otterbourne, the B2177 including Twyford.	Yes		
John	Axford	Member of the public	Not Answered	Yes	The trigger levels should be related to nature/size of pollutant source NOT simply size of site or number of dwellings	Should also include North Walls	OK	OK	OK	Yes		Yes	OK but more needs to be done to limit the most important sources of pollutants - mostly vehicles. Is it possible to identify high polluting vehicles and prevent them from entering city?	As a resident right in the middle of the City - some concession needs to be made for access to our properties, that do not apply to non-residents. Also - simply raising car parking charges will not reduce traffic - Winchester residents are far too rich!	
Malcolm	Hand	Member of the public	Not Answered	Yes	Any development outside of the SDP area but, that will potentially have an environmental/air quality impact within the area should also be included	from Fig A4- if there is new human exposure as part of the development then I do not see why there should be a difference between a site that is of known poor air quality or not- the detail of the potential impact on air quality should be the same for both and not 'the ability to submit less detailed considerations' Again, developments outside of the zone but, potentially due to wind direction etc that could affect within the zone should also have to submit detailed analysis of impact/mitigation	no comments	As mentioned previously, these criteria should also apply to developments outside of the LPA but, may have an impact within the LPA- e.g. due to prevailing wind, increase in traffic, commercial sites. Also, from the map a large part of Kings Worthy lies outside the LPA despite being a built up area which does not seem to make any sense at all unless it is outwit the WCC area. If this is the case, then the planning needs to align with the planning authority of Kings Worthy	Fine as far as it goes but, it needs to be clear that there will be monitoring put in place and if air quality/traffic standards etc are not met the construction will cease- this has to be enforceable	No	Kings Worthy lies between two major road routes and is a built up area that links directly into Winchester and should be included. Also, I am not clear if the SPD area extends 1kn beyond the anticipated final boundary of the Barton Farm Development- if not, it should do	Yes	Broadly speaking yes but with the caveats already mentioned		

George	O'Ferrall	Representative of an organisation	Southampton City Council	Yes		How does 'within an AQMA' differ from 'an area of existing poor air quality'? Is the latter open to interpretation? Are there any considerations for first floor properties or is the risk considered negligible?	Are there any solid fuels which do not include wood or coal (eg. pellets)? Is it worth specifically mentioning electric boilers? For larger residential developments, will charge points be accompanied by designated bays and/or a management plan to ensure they are not under-utilised? I welcome the ambition to include charge points in all residential developments, but would question how useful it would be for most residents.	Would suggest requirement for Euro VI/6 vehicles in CTMPs should be considered. Will developers be required to use certain dispersion models - ie. latest version of ADMS. Is there a rough assessment structure which can be suggested? Do you require developers to set out impacts in terms of Process Contribution and Predicted Environmental Concentration at each receptor? Recommend requiring assurances certain level of validation in models from developers ie. calculating Root Mean Square Error, comparing modelled vs monitored data.	Suggest that the guidance encourages consultants to propose suggested mitigations, beyond those which might be required. Will a list of typical mitigation measures be provided?	Yes		Yes		I'm aware that the outcomes of air quality assessments almost always show that the development has a negligible impact on local air quality. Will there be any provision to encourage developers to incorporate the potential impacts of committed negligible developments in a given area? Will guidance on electric vehicle charge points be included? eg. number and type of chargers depending on the development size, requirements for designated bays etc.
Anne	Moir	Member of the public	Not Answered	No		I would like the land at Five Oaks Farm Shedfield SO32 2HS to be designated as a local Green Space in the Winchester Local Plan 2018 - 2038 because I believe it has beauty, historic significance, recreational value, tranquility and rich wildlife and is an important settlement gap to th3e communities of Shedfield Parish				Not Answered		Yes		
Giles	Maltby	Representative of an organisation	Persimmon Homes	Yes					The draft SPD does not specify the cost of mitigation. As the provisions of the SPD will be increased cost of development it is important that suitable viability testing is carried out. As such, we should be suggesting that the introduction of any cost increasing provisions in the SPD should be brought in through the Local Plan review process so the provisions can be subjected to the necessary scrutiny and examination.	Yes		No	The draft SPD does not specify the cost of mitigation. As the provisions of the SPD will be increased cost of development it is important that suitable viability testing is carried out. As such, we should be suggesting that the introduction of any cost increasing provisions in the SPD should be brought in through the Local Plan review process so the provisions can be subjected to the necessary scrutiny and examination.	There is concern that the Council is seeking to introduce new planning policies contrary to guidance set out in the PPG/NPPF and/or without them having been subjected to the necessary scrutiny. Planning Practice Guidance (Paragraph: 008 Reference ID: 61-008-20190315) is clear in that SPDs do not form part of the development plan, cannot introduce new planning policies into the development plan, and should not add unnecessarily to the financial burdens on

Alexandra	Lovegrove	Representative of an organisation	Southampton City Council	Yes	SCC considers the trigger levels appropriate and supports the use of thresholds that predominantly follow the NPPF guidance of minor/major developments to ensure ease at validation stage.	The Council broadly supports the proposed specific receptor sites. The Council would suggest considering other significant roads through the SPD zone, particularly those that are part of the one-way system, act as bus routes, and are often prone to blocked traffic. Other roads to consider might include Friarsgate, Union Street, Southgate Street and St Cross Road. This would increase the area in which developers would have to consider the air quality impact on relevant receptor sites within the SPD area and could potentially be subject to submitting an AQA with planning	The Council is in support of the criteria suggested above and notes that Winchester and Southampton are working collectively with other authorities under PISH to deal with climate change issues within the South Hampshire area. We believe that if Winchester District Council (WDC) and Southampton City Council (SCC) require largely the same criteria in an AQS, both councils will be providing a coherent and consistent approach to tackling air quality in their respective localities, as well as the broader South Hampshire area. As such, SCC would	SCC are in support of the requirements for an AQA, which would include an assessment of air quality on the local area both during development and when the site is operational. The Council would also like to note that when determining planning applications it is important to take into account the potential cumulative impact which may result from a number of small developments close to one another. In the case of large sites or major strategic developments which are broken down into a series of smaller planning applications, often including a series of unrelated	SCC broadly supports the mitigation measures set out in Appendix E and F. The Council would emphasise the impact of Green Infrastructure in line with the PISH goal of delivering enhancements to green infrastructure and high quality design in the built environment to consolidate and improve the environment throughout South Hampshire. Green infrastructure can help reduce the levels of pollution in an area whilst also providing an aesthetically pleasing aspect to a scheme. Moreover, it can also act as a barrier to a pollutant source such	Yes		Yes		
Jim	Floor	Member of the public	Not Answered	Yes						Not Answered		Yes		
Josep	Simona	Representative of an organisation	GL Hearn and Capita working on behalf of DIO as part of the Defence Estates Optimisation Portfolio	Yes	No, there are not. We consider the thresholds appropriate.	We do not have any comments on these.	We agree with the requirements for inclusion proposed.	We agree with the requirements for an air quality assessment.	We do not have further comments on this point.	Yes		Yes		We agree in principle to the requirements established by the draft SPD.