## Appendix D - Officer Response

Consultation Comments	Officer Comments
	for larger sites and an AQ Statement for smaller sites?
1. Majority agree 17 Yes; 4 No	Concept broadly accepted
	reshold levels used for impact screening
1. Suggestion that 10 dwellings is too low for an AQ Assessment, to make any impact on air quality and that 150 or more be a better threshold;	Application profile in Winchester is small developments of an infilling nature. Setting a bar at 150 would not effectively ignore the vast majority of develeopments that when considered as a collective would vastly outnumber 150 and would certainly present an impact on air quality going forrward. There setting at 10 captures the total development profile for the SPD area.
2. Boiler Thermal Output of >1MW is out of date;	Agreed, however notwithstanding this is still felt to be an appropriate threshold in the absence of any alternative referenced standard.
<ol> <li>No trigger levels based air quality, instead uses threshold levels based on development size;</li> </ol>	Yes, because it is development impacts on an area of poor air quality as defined by the AQMA, which this SPD is targetting. This is why the area was not proposed to cover the whole district. In having to draw a line somewhere, officers believe the 10 unit strikes the correct balance and is practically applicable to the planning regime.
4. SCC - Threshold levels are appropriate and in line with NPPF Guidance;	Noted
Any development outside of the SDP area but, that will potentially have an environmental/air quality impact within the area should also be included	We are tareggting the AQMA. The AQ SPD area as proposed includes a buffered zone around the AQMA to include Winchesters urban development zone and an additional 1KM zone.
5. Confusion between receptor site and relevant exposure?	Noted, however re write not considerd necessary. ess of suggested receptor sites
1. Surprise that more sites are not required:	Noted however choice of streets currently included are based on long term Nox monitoring failing current standards. This is an SPD tagetting an
	AQMA based on failing NO2 standards only. Suggested roads do not fail these current standards. Note all these areas are covered by thresholds for an AQS or AQA.
2. Should also include North Walls;	Noted however choice of streets currently included are based on long term Nox monitoring failing current standards. This is an SPD tagetting an AQMA based on failing NO2 standards only. Suggested roads do not fail these current standards. Note all these areas are covered by thresholds for an AOS or AOA.
<ol><li>DM19 criteria for acceptability of environmental quality too loose and open to interpretation;</li></ol>	DM19 forms part of an existing local plan which provides the 'hook' for the SPD, which is where the detail of assessment can be found. Notwithstanding an SPD cannot change the local plan and should form consultation to the Local Plan.
<ol> <li>Suggestion that the receptor sites should also include Friarsgate, Union Street, Southgate Street and St Cross Road;</li> </ol>	Noted however choice of streets currently included are based on long term Nox monitoring failing current standards. This is an SPD tagetting an AQMA based on failing NO2 standards only. Suggested roads do not fail these current standards. Note all these areas are covered by thresholds for an AOS or AQA.
	nclusion in the Air Quality Statement
1. Ridiculous suggestion that will stifle development;	Noted, but no supporting evidence provided, so therefore mere unsubstantiated opinion Officers do not agree.
2. Ban on solid fuel appliances overzealous. Should consider Stove Industry Alliance Ecodesign ready standards as default, as recommended by DEFRA in Smoke Control Zones;	Valid point, for dicussion.
3. Is it necessary to include cycle storage when already required by Policy 8?	Valid point, but supports existing policy, so should remain.
4. Is the requirement for heating appliances practically enforceable and would the planning dept. support a pre-commencement condition?     5. Identifies a potential conflict in EV requirements between a Statement and Assessment, whereby the latter may identify no need for EV.     Recommends a stand-alone requirement for EV provision as standard requirement.	Valid point for further dicussion/proposals. Valid point. Agree that EV should be a standard requirement for all development in accordance with appended standard.
6. More cycle pathar aquired;	Noted as a matter of opinion and could form part of mitigation within an AQA.
7. Open fireplaces may be required for aesthetic purposes in non-residential development;	Officers do not consider this to be so common an issue to present a real impact and being mindful that it has to be practically appliable within planning regime. Or we could simply state that any solid fuel applicance must be EcoDesign as standard for any size development.
8. Exceptions on cycle storage should be permitted to reflect the nature of the development e.g. may not be necessary for retirement accommodation	
9. Should make reference to electric boilers;	See Point about >1MW boilers to change the boiler condition. Also potentially includes hydrogen boilers.
10. For larger development, should EVCP's have designated bays and accompanied by a management plan to ensure optimum usage; 11. SCC support for a coherent approach to AQ Statements between WCC and SCC in support of PISH objectives, but goes further to recommend that the AQS includes the No of parking spaces in accordance with the Informal Guidance regarding Air Quality and Planning in Southampton (https://www.southampton.gov.uk/images/92.11-gc-developers-informal-guide-1s1-2_tcm63-432666.pdf)	Yes, so need to convert the SPD expectation into an enforceable planing condition. Officer opinion is that we moved away from parking space requirements and this should be considerd as part of wider local plan review. SPD is intended to attract the 'right' type of car and not the total number.
	clusion in the Air Quality Assessment
Guidance on dispersion modelling is given in Appendix D, but this is only referred to in Appendix B.	Probably just a typo so will check cross referencing.
1. IAQM guidance is 'weak' on mitigations to 'make acceptable' any impacts. Also weak of defining the point where an unmitigated development is considered 'unacceptable' in planning terms;	Agree, so given we won't be rewitng the IAQM Guidnace, this does support minimum expectation requirements i.e. adopting EV and solid fuel AQS requirements as minimum standards irrespective of AQA conclusions.
2. What is the cost of an AQA?	Cica 25k - £10k depending on development profile.
<ol> <li>Requirement for an AQA should also apply to larger developments outside the SPD area, also 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;</li> </ol>	This has been previously discussed as to what the appopriate buffer is around the AQMA. This was based a 1KM buffer around Winchester's Urban development area. Inclusion of Kingsworthy would likely require a second round of consultation. Suggest we do this as Phase II to avoid further delay in the document.
<ol> <li>Would suggest requirement for Euro VI/6 vehicles in CTMPs should be considered.</li> </ol>	Relates to the construction phase and raises questions about practical enforceability. Maybe consider this as a requirement for the AQS and minimum requirement for AQA. Would need to commit through a written statement which for larger developments would form part of their CEMP. NRMM (Non road mobile machinery) could be included, but lorries accessing the site may not be under the control of the developer.
5. Should developers be required to use certain dispersion models - i.e. latest version of ADMS.	No because we ask for a suitable and sufficeint assessment as assessed by officers. This enables officers to maintain a degree of latitude when in consultation with developers.
6. Do you require developers to set out impacts in terms of Process Contribution and Predicted Environmental Concentration at each receptor?	Depends on what the impacts are to the receptors. Again this would form part of the report and subsequent dialogue with officers.
7. 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.	Noted.
8. 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 developments in the same area, the use of a 'Master or Parameter Plan' that includes an air quality assessment would be valuable to address the cumulative impact. The Council suggests that WCC might consider the cumulative impact of developments within the SPD area with a method such as this.	A valid point although we do not think this will present as a real issue within the SPD area. If we were to expand the SPD area unless it were expanded across the district.
9. We agree with the requirements for an air quality assessment.	Thanks!
F. Comments on mi	tigation requirements

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In buses, cars & delivery vehicles sometimes waiting with engines running & always when turning.       Plan and wider sustainability agenda.         This will now be a Local Plan consultation issue.       Plan and wider sustainability agenda.         The delimited area does not reflect existing air quality hotspots (which are likely to be focussed on heavily trafficked highways through the district, not guist the city of Winchester) so may include areas where air quality is on an issue while excluding other areas where air quality is an issue. A systematic review and stakeholder engagement is needed to address air quality net he A34 including Sutton Scotney, the A33 and M3 including Twyford, Colden Common, Lower Upham, Bishops Waitham, Waltham Chase, Shedfield and Wickham, the A3051 at Curbridge and the B2150 at Denmead. It is not known if there are air quality issues in other parts of the district including New Arlesford, Hursley, Whiteley.       This is why there is a buffer.         Kings Worthy lies between two major road routes and is a built up area that links directly into Vinchester and should be included. Also, I am not clear it the SPD area extends 1kn beyond the anticipated final boundary of the Barton Farm Development- if not, it should do       This is Ataget (SPD) as a way to improve the air quality within the Winchester City area?         No: 7 Yes: 13       Not Answered: 1       Majority do support the adoption of the AQ SPD		Agreed, but this relates to air quality in Winchester's AQMA. Wider air quality issues will be a matter of further consideration as part of the new Local
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I. Comments on to whether consultee supports the adoption of this draft air quality supplementary planning document (SPD)	No: 7 Yes: 13 Not Answered: 1	Majority do support the adoption of the AQ SPD
	I. Comments on to whether consultee supports the adoption of	of this draft air quality supplementary planning document (SPD)

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	Officers do not assess with this statement. It does coal to have but it does coal to require bottom standards is a bausing market which is already your
	Officers do not agree with this statement. It does seek to ban but it does seek to require better standards in a housing market which is already very burnet the helidian tended.
instead of bettering them.	lucrative from the building trade. Agreed, however the SPD alllows for this as part of the AQA proposals in mitigation.
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.	
The document only seems to deal with new builds but makes no mention of road closures or road narrowing which has happenend without public	This is a comment about Hyde Street closure. Road closures do not form part of the Development control process and therefore fall outside of
consultation. The Hampshire Chronicle gives the impression that they will be part of a public consultation but I can find no information at all.	scope.
There is a lack of quantitative evidence to support it. Qualitative statements are made against specific numerical targets in the appendices.	Quantitative evidence of need can be found in the AQAP and the need to reduce Nox within the AQMA.
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	Possibly, but this is an idealistic statement and Winchester cannot be expected to re write and adopt a revised version of the national guidance for
the expected material improvements without a greater focus on requiring & securing mitigation measures as a routine matter (or against criteria which	itself. Officers do not believe that its currently possible for new devlopemnet to present a 'no net incease' in air quality emissions.
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 quality & climate change objectives, and looking at ways through which it may be	This AQ SPD predicates purely on the AQAP the aim of which is to reduce Nox levels in the AQMA. Whilst officers agree with this statement, making
possible to focus on effectively securing mitigation of domestic combustion emissions (cooking, space / water heating, heat recovery, LZC tech, etc.)	synergy between air quality and climate change need to be done through the new Local Plan and then we can broaden its remit going forward.
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	Yes, but again based on the AQMA, plus a buffer and not intended to cover the entire district.
to buses, cars & delivery vehicles sometimes waiting with engines running & always when turning.	
This will now be a Local Plan consultation issue.	
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	This is city transportation access statement and is picked up within the AQAP and the Movement Strategy and not through the Planning Regime.
prevent them from entering city?	
Broadly speaking yes but with the caveats already mentioned	Ok
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	Noted, but its not possible to stipulate mitigation costs as these will vary according to modelled impacts and subsequent mitigations required.
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.	
	ients not already covered
The document mentions air quality but thus far not any potential resolution. If the plans include road closures or narrowing then there should be	Noted and as stated mitigating development inmpacts on air quality is only piece in a larger puzzle.
specific mention of these otherwise this consultation is worthless. That is presumably what the councillors intended.	
Support this initiative	Noted
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	Noted and picked up as part of the Movement Strategy.
traffic lights where most cycle lanes stop and where it is most dangerous.	
I would like to know more about how WCC will monitor compliance with requirements and enforce the regulations properly	This will be dome through thought through Planning Conditions
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	As above
to buses, cars & delivery vehicles sometimes waiting with engines running & always when turning.	
This will now be a Local Plan consultation issue.	
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.	Noted, but this isn't what this AQ SPD is proposing.
Also - simply raising car parking charges will not reduce traffic - Winchester residents are far too rich!	
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	Noted and we will be proposing minimum requirements for larger developments.
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	Yes it already is as set out in Appendices.
vin guidance on electric venice charge points be included a eg. number and type of chargers depending on the development size, requirements for designated bays etc.	
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	A query for our Strategic Planners
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 development.	
We agree in principle to the requirements established by the draft SPD.	Noted.