

Appendix D - Officer Response

Consultation Comments	Officer Comments
A. Do you support the concept of an AQ Assessment for larger sites and an AQ Statement for smaller sites?	
1. Majority agree 17 Yes; 4 No	Concept broadly accepted
B. Comments on appropriateness of Threshold 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 developments that when considered as a collective would vastly outnumber 150 and would certainly present an impact on air quality going forward. 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1MW is out of date;	Agreed, however notwithstanding this is still felt to be an appropriate threshold in the absence of any alternative referenced standard.
3. No trigger levels based air quality, instead uses threshold levels based on development size;	Yes, because it is development impacts on an area of poor air quality as defined by the AQMA, which this SPD is targeting. 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 targeting 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 considered necessary.
C. Comments on appropriateness 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 targeting 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 targeting 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.
3. DM19 criteria for acceptability of environmental quality too loose and open to interpretation;	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.
4. Suggestion that the receptor sites should also include Friarsgate, Union Street, Southgate Street and St Cross Road;	Noted however choice of streets currently included are based on long term Nox monitoring failing current standards. This is an SPD targeting 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.
D. Comments on requirements for inclusion 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 discussion.
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?	Valid point for further discussion/proposals.
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. Agree that EV should be a standard requirement for all development in accordance with appended standard.
6. More cycle paths required;	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 applicable within planning regime. Or we could simply state that any solid fuel appliance 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;	Officers do not agree. Persons working, visiting or living in a retirement or care home may wish to cycle there.
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;	Yes, so need to convert the SPD expectation into an enforceable planing condition.
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-1st-2_tcm63-432666.pdf)	Officer opinion is that we moved away from parking space requirements and this should be considered as part of wider local plan review. SPD is intended to attract the 'right' type of car and not the total number.
E. Comments on requirements for inclusion 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 rewriting the IAQM Guidance, 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 £5k - £10k depending on development profile.
3. 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;	This has been previously discussed as to what the appropriate 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.
4. Would suggest requirement for Euro VI/6 vehicles in CTMPs should be considered.	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 sufficient 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 mitigation requirements	

1. The introductory text 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).	Cost accounting was discounted as a means of mitigation so this is no longer an issue. Instead we have opted for acceptable/unacceptable based on mitigations offered. They cannot pay off their AQ impacts from the SPD.
2. 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 ineffective in practice);	Ok, but there are no current alternative methods available to us.
SPD is not explicit that this is the intention, however, and Appendices E and F do not set out a cost accounting / required spend / quantified benefit process as it may be taken to imply.	Cost accounting was discounted as a means of mitigation so this is no longer an issue. Instead we have opted for acceptable/unacceptable based on mitigations offered. They cannot pay off their AQ impacts from the SPD.
3. The wording of the SPD implies that mitigation is required (only) where AQ impact is 'unacceptable' - requiring at least some degree of 'significance' under the IAQM criteria, and so the SPD falls short of requiring a 'no net increase' in ambient air pollution. In this sense, I'm not sure that the policy adds anything to the NPPF requirements, and I would suggest that it is strengthened in the area of securing a proportional mitigation of the AQ impacts of development irrespective of the 'significance' of those impacts.	Agreed and makes the point that a 'do something' requirement to be adopted as a minimum standard for the AQA. EV Solid fuel and NRRMM requirements
4. The SPD allows refusal of an application only where its impact is unacceptable and where the developer refuses to propose 'sufficient' mitigation (not defined). Similarly, conditions / s106 may only be used to secure proposed mitigation, and it is not clear that the Council has any option to impose a given level of mitigation by condition in order to make the development acceptable against local planning policy (e.g. as the parking service does - securing funds to manage foreseeable parking problems, irrespective of proposals).	Accepted as the SPD is about negating the need for an AQMA and not a net zero gain document.
5. Experience would suggest that the most successful means of securing mitigation measures would be through the imposition of planning conditions that require discharge - not necessarily Grampian style, but perhaps with a 'prior to occupation' clause. To do otherwise will impair the Council's awareness of the success or otherwise of implementation, and this undermines its ability to ensure expected mitigation is achieved, even where the planning service is willing to treat this as an enforceable matter (given the lack of a duty to enforce).	Noted, which is why require additional internal dialogue on the mechanism for enforcing the AQS/AQA within conditioning. Would not however hold up the SPD.
6. How will compliance be monitored and enforced?	As above
7. There is a risk that S106 obligations would be used in lieu of planning conditions to control air quality. It would be interesting to know what sort of obligations are being considered for a S106 that could not be adequately addressed via conditions.	Again a broad comment on implementation. Expectation is that its delivered through mitigations from AQA. Or basic requirements as set down.
A particular concern would be where a S106 agreement was used to pay a levy to the council where there was a legitimate air quality concern over proposed development on the understanding that the council would then use the levy for generic improvements in air quality not necessarily related to the particular development.	Paying off air quality impacts is not provided for within the SPD.
8. 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	Agreed a dialogue on conditioning and enforcement is required.
9. 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?	A list has been provided in an appendix but not withstanding this would form part of a competent consultants AQA.
10. 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.	No because that forms part of the AQA. The SPD consultation process includes considerations of viability. But you have to draw the line somewhere.
11. 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 as a busy road and certain types of trees and shrubs are particularly effective at removing particulates from the atmosphere. In light of this information, the Council would like to suggest that WCC consider including a condition that requires suitable and effective greenery as a tool for air quality improvement, as well as a physical barrier to roads.	WCC Officers do not believe that this greenery approach provides significant air quality improvements and would not support its conditioning. There is little evidence for NOx improvement and some for particulate improvement.
12. SCC would also like to reiterate the need for coherent and consistent planning among neighbouring authorities and suggest that WCC might consider additional mitigation methods that are listed in the Informal Guidance regarding Air Quality and Planning in Southampton. Other mitigation measures include those related to micro/shared mobility. These could include the creation/promotion of existing car clubs or the installation of e-scooter/e-bike hiring schemes as forms of sustainable travel.	Ok, but this forms part of a regional approach and goes way beyond the AQ SPD area, which is wrapped up in the Winchester Movement Strategy. Any approach towards regional sustainable transport interconnectivity is welcomed but goes beyond this SPD.
13. Finally, it is important to note the consistent commuter flows that exist between Winchester and Southampton by road and rail, some of which depart directly from the SPD area, including Winchester Station. Commuters travel between Winchester and Southampton for work, leisure and onward travel and all contribute greatly to the economic stability of both cities. In light of the above, the Council broadly supports mitigation measures related to the creation of sustainable travel plans and public transport provision and believes it is important to support and encourage effective plan-making within our neighbouring authorities to ensure the perpetuation of sustainable travel into and out of both Winchester and Southampton.	Noted, as above
G. Comments on whether proposed area of the SPD is appropriate, where answer was 'No'	
No: 7 Yes: 11 No Comment: 3	Slim majority agree that the SPD area is appropriate
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.	The boundary has to be drawn somewhere and it was agreed that the SPD related to air quality in the AQMA so a buffer had to be drawn to cover smaller and moderate developments within the area. Larger developments outside the SPD area would still be expected to deliver their own AQA as a separate matter under an MDA.
No quantitative evidence is given that air quality issues exist across this area to support the proposed restrictive guidance above & beyond national planning measures.	This challenges in reverse. It is based on the natural expectation that developments in close to the AQMA will have an impact upon it and therefore a buffer was agreed as being 1KM around the Winchester Urban Development Area.
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.	The heavy traffic is in fact generated by persons living outside and accessing the AQMA.
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 Plan consultation issue.	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 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 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, Colden Common, Lower Upham, Bishops Waltham, 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 Ariesford, Hursley, Whiteley.	This is a targeted document targeting poor air quality within the AQMA which is in Winchester. The other areas as mentioned are not currently failing the legal air quality standards.
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	This is why there is a buffer.
H. 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?	
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 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 instead of bettering them.	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 lucrative from the building trade.
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.	Agreed, however the SPD allows for this as part of the AQA proposals in mitigation.
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.	This is a comment about Hyde Street closure. Road closures do not form part of the Development control process and therefore fall outside of 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 its 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).	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 itself. Officers do not believe that its currently possible for new developemnet to present a 'no net increase' in air quality emissions.
I would also suggest making links to the synergy between air quality & climate change objectives, and looking at ways through which it may be possible to focus on effectively securing mitigation of domestic combustion emissions (cooking, space / water heating, heat recovery, LZC tech, etc.)	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 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 to buses, cars & delivery vehicles sometimes waiting with engines running & always when turning. This will now be a Local Plan consultation issue.	Yes, but again based on the AQMA, plus a buffer and not intended to cover the entire district.
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? Broadly speaking yes but with the caveats already mentioned	This is city transportation access statement and is picked up within the AQAP and the Movement Strategy and not through the Planning Regime. 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 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.	Noted, but its not possible to stipulate mitigation costs as these will vary according to modelled impacts and subsequent mitigations required.
J. Any Additional Comments 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 specific mention of these otherwise this consultation is worthless. That is presumably what the councillors intended.	Noted and as stated mitigating development impacts on air quality is only piece in a larger puzzle.
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 traffic lights where most cycle lanes stop and where it is most dangerous.	Noted and picked up as part of the Movement Strategy.
I would like to know more about how WCC will monitor compliance with requirements and enforce the regulations properly	This will be done 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 to buses, cars & delivery vehicles sometimes waiting with engines running & always when turning. This will now be a Local Plan consultation issue.	As above
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!	Noted, but this isn't what this AQ SPD is proposing.
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.	Noted and we will be proposing minimum requirements for larger developments.
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.	Yes it already is as set out in Appendices.
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 development.	A query for our Strategic Planners
We agree in principle to the requirements established by the draft SPD.	Noted.