

SUSTAINABILITY APPRAISAL

(Incorporating a Strategic Environmental Assessment)

TWYFORD NEIGHBOURHOOD PLAN SUBMISSION DRAFT

15/01/2021

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NON TECHNICAL SUMMARY

1. Introduction

- 1.1 This is the non-technical summary of the main Sustainability Appraisal (SA) for the Twyford Neighbourhood Plan (TNP). It gives a summary of the main findings of the SA which also incorporates the requirements of a Strategic Environmental Assessment (SEA). It has been prepared to set out the findings from the appraisal of the Twyford Neighbourhood Plan and will be published alongside the final Submission version under Regulation 16 of the Neighbourhood Planning Regulations 2012.
- 1.2 The SA also complies with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2014. These Regulations incorporate the information which is required in accordance with EU Directive 2001/42/EC on the Environmental Assessment of Plans and Programmes (the SEA Directive).
- 1.3 The main purpose of a SA is to ensure that, as far as possible, the most sustainable options have been chosen for the policies and allocated sites in the Neighbourhood Plan. The SA process appraises the policies and allocated sites as well as reasonable alternatives against a Sustainability Appraisal Framework. This seeks to identify any potential significant negative effects of the plan. Such impacts can also arise where there is a combination of effects. Where negative effects are identified mitigation measures are suggested to reduce or negate the negative effects. The appraisal process should also identify potential positive effects and seek to enhance these where possible. The SA also includes a set of indicators which would form the monitoring regime for the plan. These could be used to monitor any significant negative and positive effects of the plan. This will ensure that if negative impacts occur action can be taken to reduce them. Monitoring the effects of the Plan will also help to inform the development of future neighbourhood plans.

2. The Twyford Neighbourhood Plan

- 2.1 The Twyford Neighbourhood Plan (TNP) covers the whole parish of Twyford. This is a rural area in Hampshire at the western end of the South Downs National Park. Twyford village is the largest settlement in the parish. It is situated in the western part of the parish with farms and isolated properties spread through the rest of the parish. The larger conurbations of Winchester and Southampton lie to the north and south of the area (respectively).
- 2.2 The TNP sets out a vision and objectives to guide development between 2019 and 2033. Once the TNP is made it will form part of the development plan for the area and will be a material consideration when determining planning applications. The higher level plan that will also guide development in the parish is the South Downs Local Plan which was adopted in 2019.
- 2.3 The TNP contains a comprehensive range of policies. These reflect the need to protect and enhance the high quality environment of the area in terms of its landscape, biodiversity and heritage assets. It also addresses local environmental issues such as flooding and traffic congestion/speeding as well socio-economic issues such as the demand for affordable housing, the need for community facilities (such as village centre car park) and the need to control commuting into Twyford village.
- 2.4 The plan allocates 20 dwellings on one site which is adjacent to the current settlement boundary. This, therefore, conforms to the South Downs Local Plan (2019) which states that 20 dwellings

should be allocated in the TNP. The allocated site also seeks to provide community benefit by incorporating an area of open space with mature trees, an extension to the existing village centre car park and to alleviate flood risk that is currently experienced within the site, the centre of the village and adjacent to the proposed development site.

3. Outcome of the Appraisal

- 3.1 The first stage of the appraisal is to assess the strategic approach in the TNP alongside any alternatives that were considered when the plan was being put together. The strategic aspects that were considered for the appraisal were:-
- changes to the settlement boundary against retaining the current boundary;
 - allocating different total numbers of housing;
 - four options for allocating the required number of houses (20), involving two sites.
- 3.2 The appraisal concluded that the proposed changes to the settlement boundary are likely to be generally positive. The negative effects of restricting development sites for housing and the economy are likely to be minor; as only a small amount of land would be affected by the proposed reduction in the settlement boundary.
- 3.3 One reasonable alternative was appraised in terms of the number of houses to be allocated in the plan, which was to allocate 34 houses on the two sites with less landscape impact (20 homes on site 1 and 14 homes on site 26). Another potential option was to allocate 70 dwellings which could bring forward 35 affordable houses to meet the requirement identified in the Local Housing Need Survey. However, the suggested number of houses significantly exceeds the figure in the South Downs Local Plan. Although Policy SD26 allows parishes to propose higher levels of development than set out in the SDLP, such a significant increase would be likely to result in very harmful landscape impacts that would conflict with other strategic policies in the Local Plan, therefore this option was not considered to be a reasonable alternative. A further option suggested at Regulation 14 stage of providing more dwellings on sites 1 and 26 was considered likely to have similar impacts to the options already appraised.
- 3.4 The final strategic level appraisal was in terms of which site (or sites) would be allocated to provide 20 dwellings. Four options were appraised on two sites, as follows:-
- A - All 20 dwellings on site 26;
 - B - All 20 dwellings on site 1;
 - C - Split the provision of dwellings between site 1 and 26, with 11 houses on each site giving a total of 22 (sites with over 10 houses maximise the provision of on-site affordable homes as per the policy in the South Downs Submission Local Plan);
 - D - Site 26 to accommodate 14 dwellings on an area of this site suggested in a Landscape Assessment, with 6 further houses on site 1.
- 3.5 The following table gives the outcome of the appraisal. It should be stressed that the potential effects shown below are prior to any mitigation being applied.

SA Framework Objectives	Landscape	Biodiversity	Heritage assets &	Housing & built	Accessibility	Community	Water	Economy
Alternative delivery options								
A/ Site 26 – 20 dwellings	X	-	X	++	++	++	X	-
B/ Site 1 – 20 dwellings	-	-	-	++	-	+	-	-
C/ Site 1 = 11 dwellings & site 26 = 11 dwellings	-	-	X	++	-	++?	X	-
D/ Site 26 = 14 dwellings & site 1 = 6 dwellings	-	-	X	+	+	++?	X	-

Appraisal of the site allocation options (without mitigation)

3.6 The following table lists the mitigation measures relating to site 26. This demonstrates that the potential negative effects identified in the above table can be reduced/overcome.

Issue	Mitigation measure/ Enhancement
Heritage impact - conservation area is adjacent to part of the western boundary of the site	Mitigate – ensure that views from within the conservation area are protected through the appropriate design and layout of the development and the use of muted tones for the building materials (advice from the Conservation Officer at the South Downs National Park Authority (SDNPA))
Landscape impact – edge of village location, rising to the north with an open aspect to the wider countryside	Mitigate – the detailed design and layout should make a positive contribution to the Conservation Area and provide an edge to the settlement. Provide a detailed landscape and visual impact assessment to demonstrate that the design and layout of the site minimizes the impact on the landscape
Flood risk - Flood zone 3 along Hazeley Road plus groundwater and surface water flood risk within the southern part of the allocated site	Mitigate as per the Strategic Flood Risk Assessment (SFRA):- <ul style="list-style-type: none"> - locate housing away from the localized areas for potential groundwater and surface water flood risk - access to the site and internal site access roads to be designed to avoid potential surface water and groundwater flood risk if possible, or to incorporate mitigation measures - Twyford Parish Council with Winchester City Council, Hampshire County Council and the SDNPA to investigate potential to allocate partnership funding/resources towards flood risk mitigation projects within the wider catchment (especially downstream of the site) - complete a site specific assessment of surface water and groundwater flood risk, considering potential climate change impacts over the lifetime of the development and including the potential for surface water run-on from off-site - the site specific flood risk assessment should also confirm suitability or otherwise for filtration through Sustainable Urban Drainage Systems and assess the groundwater levels below the site. It should also demonstrate sufficient attenuation storage within the site, identify discharge routes from the site and agree the maximum discharge rates with the Lead Local Flood Authority or Southern Water (as appropriate).

Summary of mitigation measures for site 26 (adjacent to the village centre)

- 3.7 The two sites that were appraised were site 1 and site 26 (as defined in the Site Selection Process). Site 1 lies further from the village centre, is adjacent to existing housing and an employment site, as well as the current settlement boundary. It has less constraints than site 26 and can accommodate 20 dwellings. It can maximise the number of on-site affordable homes as well as some open space.
- 3.8 Site 26 is directly adjacent to the village centre and could provide affordable housing and other community benefits that are included as objectives in the TNP; namely an extension to the village centre car park and flood alleviation for the village centre and the site itself. As the first table on page 4 demonstrates it has some constraints. The initial Landscape Assessment, which formed part of the site selection process, suggested that if development was limited to part of the site, this would reduce the potential impact on the landscape; as the whole site is open to the adjoining land adjacent to the village and also provides a gateway to the village. The smaller site could only accommodate up to 14 dwellings (as well as open space and the car park extension). Hence, the appraisal of options C and D.
- 3.9 All of the options that involve site 26 are constrained in terms of the water objective as a small part of the site has medium/high risk of surface water and groundwater flooding. The access road (Hazeley Road) also has high risk of flooding. All of the options containing site 26 would be affected by this issue; hence the negative effect on the water objective.
- 3.10 The final potential negative effect of site 26 is on heritage assets. This is because the site lies partly within and partly adjacent to a Conservation Area. There is also a listed building to the north of the site but this is well screened and the impact on this building is likely to be low.
- 3.11 Option C and D were appraised as they reduced the developable area of site 26 and, therefore, the number of houses that would be developed. Option C would allocate 11 houses on site 1 and site 26 which would maximise the number of affordable houses on each site. Option D increases the number of houses on site 26, to 14, whilst still reducing the size of the site. Overall this option is likely to deliver slightly fewer affordable homes. There is some doubt whether these options could deliver the community benefits; as 14 houses on site 26 might not cover the costs of these benefits as well as building the affordable homes. Furthermore, these options would not be an efficient use of the sites, as they are both capable of accommodating 20 dwellings.
- 3.12 Overall site 1 has fewer negative effects on the sustainability objectives and can accommodate 20 dwellings and therefore, maximises the use of the site and the number of on-site affordable homes. Although site 26 has the potential for more negative impacts, officers at the SDNPA have confirmed that the landscape and heritage impacts can be reduced to an acceptable level with the appropriate design, layout and use of materials. The SFRA suggests that the site is suitable for housing subject to a suitable flood alleviation scheme being implemented. The Parish Council is now taking a scheme forward to determine the details, costs and potential financing, and has made significant progress on this since the Regulation 14 consultation. It is essential that the landscaping and flood mitigation measures are considered in tandem to ensure that the potential negative impacts of both issues are minimised.
- 3.13 In sustainability terms, site 26 can deliver some positive outcomes which would realise some of the objectives in the TNP. These cannot be realised by allocating site 1. Site 26 could provide an extension to the village centre car park. Demand is high for the use of the car park which means that cars are parked on the streets near to the village centre; adding to congestion in the area. The development of site 26 for 20 houses has the potential to bring forward a scheme to alleviate the

flooding issues in the village centre; as well as ensuring that the development site does not experience flooding. All of the measures that can be taken to reduce/overcome the potential negative effects from developing this site are listed in the second table in this summary (these are known as mitigation measures).

- 3.14 The next stage of the appraisal was to assess the potential effects of the policies on the environment, economy and society of the parish. This concluded that overall there are not likely to be any significant negative effects on the sustainability of the area from the implementation of the policies in the TNP. The appraisal suggests some minor amendments to a few of the policies which could reduce some of the less significant effects and also enhance the plan.
- 3.15 The final appraisal was to determine the potential effects of the plan from implementing the policies and developing the allocated housing site. This concluded that there are unlikely to be significant negative effects from the total plan. It generally balances the socio-economic needs of the parish within the strong environmental constraints of the area.

4. **Next Steps**

- 4.1 The ongoing aspect of undertaking an SA is the requirement to monitor the significant effects of the Plan which has been appraised. This is to ensure that the mitigation measures are effective and the positive aspects are also being realised. If this is not the case then action can be taken. Furthermore, the results of the monitoring can help with producing future versions of the Plan. The monitoring regime for the TNP is included in Table 3 of the main report which includes the SA Framework.
- 4.2 The SA is being published alongside the Submission version of the Neighbourhood Plan under Regulation 16 of the Neighbourhood Planning Regulations 2012 for a period of 6 weeks. Comments on the SA will be considered by the independent Examiner as part of the examination of the Neighbourhood Plan.

5.0 **Summary of Changes for submission version**

- 5.1 This version includes the following changes:
- Updated references to the Twyford Neighbourhood Plan which is now at submission stage and to take account of changes to policies and policy numbering;
 - Response to a suggestion at Regulation 14 stage that an option should be tested that provided more homes on sites 1 and 26;
 - Amendments to reflect the progress that the Parish Council has made on the Flood Alleviation Scheme; and
 - Amendments to reflect additional information provided about the accessibility issues of site 26.

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1. Introduction

Purpose of the report

- 1.1 This report forms the Sustainability Appraisal (SA) for the Submission Twyford Neighbourhood Plan. It also incorporates the requirements of a Strategic Environmental Assessment (SEA). It has been prepared to set out the findings from the appraisal and is being published under Regulation 16 of the Neighbourhood Planning Regulations 2012.
- 1.2 The report complies with the requirements of the EU Directive 2001/42/EC on the Environmental Assessment of Plans and Programmes (the SEA Directive). This has been translated into UK law in the Environmental Assessment of Plans and Programmes Regulations 2014.
- 1.3 The main purpose of an SA is to ensure that, as far as possible, the most sustainable options have been chosen for the policies and allocated sites in the Neighbourhood Plan. The SA process, therefore, appraises the policies and allocated sites as well as reasonable alternatives against a Sustainable Appraisal Framework. This seeks to identify any potential negative effects of the plan from the policies or allocated sites or through a combination of effects. Where negative effects are identified mitigation measures are suggested to reduce or negate the negative effects. The appraisal process also identifies positive effects and seeks to enhance these where possible. Finally, the SA suggests a monitoring regime to report on any significant negative and positive effects arising from the plan.

The Twyford Neighbourhood Plan

- 1.4 The area covered by the Twyford Neighbourhood Plan (TNP) is shown in Appendix 1. This is contiguous with the parish boundary and the whole area falls within the South Downs National Park. It is largely rural with the largest settlement being Twyford which lies within the western part of the Plan area. The eastern part of the area has scattered properties and farms. The area is dominated by the downs and the River Itchen which lies to the west of Twyford. The parish is close to the larger urban areas of Winchester (to the north) and Eastleigh and Southampton to the south.
- 1.5 The decision to prepare a Neighbourhood Plan was taken by the Parish Council on 23rd October 2014. It is being prepared in accordance with the Neighbourhood Planning Regulations 2012, the Localism Act 2011 and the Planning and Compulsory Purchase Act 2004.
- 1.6 The Parish Council established a Technical Committee with volunteers drawn from the local community to steer and undertake the work to prepare the plan. This has brought considerable local knowledge to the plan preparation. The community has been involved at every stage of the development of the TNP. This has involved a series of community events, drop in sessions, meetings with community groups and completing a Housing Needs Survey. There is also a dedicated website where residents can register to receive email updates every time there are changes and updates placed on the website.

- 1.7 In addition to the work by the Technical Committee and the community, consultants were used to complete some of the specialist work; such as preparing a Local Landscape Assessment¹. Part 2 of this document assessed the potential landscape impact of each of the final housing sites which were identified through a selection process. This is an important consideration given the location of the parish in a National Park. Part 3 of the Assessment reviewed the settlement boundary and made recommendations for modifications to the boundary.
- 1.8 An important influence on the Plan is to ensure that it supports the purpose and duties of the National Park. This is established in the Environment Act 1995. The purpose is: -
- ***To conserve and enhance the natural beauty, wildlife and cultural heritage of the area;***
 - ***To promote opportunities for the understanding and enjoyment of the special qualities of the national park by the public.***
- 1.9 In carrying out these purposes national parks have a duty to **“seek to foster the economic and social well-being of the local communities within the National Park”**.
- 1.10 Although the purposes and duty relate to National Park Authorities’ these should also have a significant influence on the development of the Neighbourhood Plan. Overall the Plan needs to reflect the importance of protecting and enhancing landscape, biodiversity and heritage assets in its policies and the allocation of sites for development. The economic and social well-being of the community should also be supported.
- 1.11 The TNP sets out a vision and objectives to guide development between 2019 and 2033. Once the TNP is made it will form part of the development plan for the area and will be a material consideration when determining planning applications. The higher level plan that will also guide development is the South Downs Local Plan; which has been adopted in 2019.
- 1.12 The TNP contains a comprehensive range of policies. These reflect the need to protect and enhance the high quality environment of the area in terms of its landscape, biodiversity and heritage assets. It also addresses local environmental issues such as flooding and traffic congestion/speeding as well socio-economic issues such as the demand for affordable housing, the need for community facilities (such as village centre car park) and the need to control commuting into Twyford village.
- 1.13 The plan allocates 20 dwellings on one site which is adjacent to the current settlement boundary. This, therefore, conforms to the relevant South Downs Local Plan (2019) which states that 20 dwellings should be allocated in the Twyford Neighbourhood Plan. The allocated site also seeks to provide community benefit by incorporated an area of open space, an extension to the existing village centre car park and to alleviate flood risk that is currently experienced within the site, the centre of the village and adjacent to the proposed development site.

¹Twyford Parish Landscape Assessment (February 2016) Terra Firma Consultancy Ltd

2. The SA/SEA process

- 2.1 This section of the report explains why an SA/SEA is required and gives an overview of what is included in the appraisal process. It also explains the requirements of the EU Directive on SEA and where these have been included in this report.

The need for SA/SEA

- 2.2 A Strategic Environmental Assessment is not required for all Neighbourhood Plans. The process is required where such a Plan allocates land for development and has the potential to have a significant impact on the environment or where the Neighbourhood Plan area contains sensitive natural or heritage assets. The requirement to carry out a SEA is determined through a Screening Opinion.
- 2.3 The Screening Opinion for the early stages of the development of the Twyford Neighbourhood Plan confirmed the need for a SEA. This was determined because of the following:-
- The South Downs Local Plan includes an allocation of 20 dwellings for Twyford which was assessed through the SA for this Plan. However, this has not been subject to a detailed site specific assessment and there is the possibility that the Neighbourhood Plan could allocate more than 20 dwellings;
 - Given the number and significance of environmentally designated sites, some of which are close to the built up area of Twyford village, there is the potential for significant environmental effects from the proposed allocations. This view is reinforced by the identification of likely significant effects through the Habitats Regulations Assessment process.
- 2.4 Having established that a SEA was required the decision was taken to produce a joint SEA and Sustainability Appraisal. The latter extends the requirements of the SEA to incorporate social and economic issues. Whilst there is no legal requirement for a Neighbourhood Plan to have a SA, one of the 'basic conditions' that such plans must meet is that "the making of the neighbourhood plan contributes to the achievement of sustainable development"². A formal appraisal which assesses the Plan against relevant sustainability issues provides a structured way of demonstrating this. A SA provides a systematic way of assessing the environmental, social and economic effects of a plan. The aim is to reduce any potential negative effects and enhance any positive effects of the environment and socio-economic issues and thereby strengthen the Plan.

Stages in the SEA/SA

- 2.5 Another of the basic conditions that the Examiner will address is whether the Plan adheres to the requirements of relevant European legislation. The SA (incorporating the Environment Report) must include all of the requirements of EU Directive 2001/42 on strategic environmental assessment. The requirements of the SEA process are contained in Annex II to the Directive. These are repeated in Table 1 along with how these requirements have been incorporated into this SA and the accompanying Scoping Report.

² Neighbourhood Planning (General) Regulations 2012

Requirement of the SEA Directive (Annex II)	Sustainability Appraisal
An outline of the contents, main objectives of the plan, and relationship with other relevant plans or programmes	Scoping report
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Scoping report, SA report section 5 and 6
The environmental characteristics of areas likely to be significantly affected	Scoping Report and SA report section 6
Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of particular environmental importance	Scoping Report and SA report section 5
The environmental protection objectives, established at international, community or national level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation	Scoping Report
The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors	SA report section 6
The measures envisaged to prevent, reduce, and as fully as possible offset any significant adverse effects on the environment of implementing the plan	SA report section 7
An outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	SA report section 6
A description of measures envisaged concerning monitoring	SA report section 7

Table 1 – Requirements of the EU Directive and their inclusion in the SA

- 2.6 The requirements of the SEA occur at different stages of the appraisal process but should be an integral part of developing the Neighbourhood Plan. It is an iterative process as the findings of the SA should influence how the Plan develops.

3. Scoping Report

- 3.1 Once the need for a SA has been determined a scoping process is undertaken. This determines the main issues that the appraisal will focus on and the level of detail that will be used for carrying out the SA. It identifies the key environmental and socio-economic issues that are relevant to the area. In order to do this there are two areas of work that are completed; collating relevant data and sources of information and identifying plans and policies that influence these issues in the Plan area. The latter also assists with ensuring that the Plan complies with national policy (particularly the National Planning Policy Framework) and higher level plans.
- 3.2 The outcomes of the scoping process are presented in a Scoping Report. The Scoping Report for the Twyford Neighbourhood Plan can be found at <https://www.twyfordneighbourhoodplan.com/>. This presents information on the following tasks:-
- Collecting the baseline information on environmental, social and economic issues;
 - Identifying relevant policies, plans and programmes;
 - Identifying sustainability strengths, weaknesses, opportunities and challenges;
 - Developing the SA Framework.
- 3.3 The SA Framework is based on the first three elements listed above and contains the objectives that were used to appraise the Plan. It also contains suggested indicators that could be used to monitor the Plan for its potential significant effects.

Outcome of the consultation

- 3.4 The Scoping Report was published for consultation for 5 weeks between 19th December 2016 and 30th January 2017. This gave statutory consultees an opportunity to ensure that the main sustainability issues had been identified and that the proposed assessment methodology was acceptable. The comments that were received are shown in Appendix 2, together with a response to the suggested changes and an indication of the modifications that have been made.
- 3.5 There are some minor changes and additions requested to the baseline information. The topic of climate change has been changed in the Sustainability Appraisal Framework to water environment to reflect the importance of this issue to the parish. As parts of the parish fall within Flood Zone 3a/b flooding is a significant issue for the plan area. Under the National Planning Policy Framework (NPPF) a sequential test is required to ensure that development takes place in areas at the lowest risk of flooding. Sewer flooding is also an issue in part of Twyford and occurs when heavy rainfall causes surface water to flow into a combined sewage system. Evidence for this is included in A Water Cycle Study and Strategic Flood Risk Assessment for the South Downs³.
- 3.6 Another aspect that is relevant to the parish is the impact of development on water quality. Parts of the parish falls within zone 1, 1c and 2 groundwater protection zone. In such areas measures need to be taken to ensure that development does not impact on the quality of the groundwater quality. This is now reflected in the SA through inclusion in the SA Framework (see Figure 1).

³South Downs National Park Authority - Water Cycle Study and Strategic Flood Risk Assessment Level 1 : Scoping and Outline Report AMEC Environment and Infrastructure UK Ltd. (April 2015)

- 3.7 Further updates to the scoping aspect of the SEA are required due to relevant documents/reports that have been published since the Scoping Report was produced. The SDNPA published an Updated Level 1 and Level 2 Strategic Flood Risk Assessment (SFRA)⁴. Site 26, one of the potential allocated housing sites, assessed in this document. It concludes that a small part of the site is at risk of surface water flooding (2% is at high risk and 3% at medium risk). The flood risk area lies within the south eastern part of the site. In addition, Hazeley Road, which would provide access to the proposed site, is also at risk of surface water flooding.
- 3.8 The SFRA also states that the same site and its access road are at risk of groundwater flooding, as these lie along the base of a dry valley where the water table could rise above ground level during wet periods. Again the southernmost part of site has the highest risk. The SFRA goes on to state that housing is an appropriate use for the site, provided that appropriate mitigation measures are implemented. It lists policy recommendations to manage the flood risk.
- 3.9 Flood risk is an issue for several areas of Twyford village. This is due to its location, topography and geology as well as its proximity to the River Itchen. There have been several historical flooding events in the village which were linked to heavy and prolonged rainfall. New development in the village could exacerbate this flooding; particularly in the village centre and along Hazeley Road.
- 3.10 Hampshire County Council, therefore, commissioned a flood investigation report⁵. The report concluded that there are two engineering solutions that have the potential to mitigate against the type of flooding that has been experienced previously in the village centre and the potential housing site. A third option was dismissed as this was not considered to provide the same level of reduction in flood risk as the other two solutions. Given the cost of the engineering solutions and the difficulty sometimes experienced in securing funding other non-engineering solutions are also included in the study; including the maintenance of existing surface water drainage systems. Plus the Twyford Parish Council has subsequently commissioned further study of the options and costs and a preferred solution developed.
- 3.11 Since the consultation on the Scoping Report the SDNPA has adopted the South Downs Local Plan, the housing provision set for Twyford is approximately 20 dwellings as set out in Policy SD26. It also divides the National Park into landscape character areas and Twyford lies in the dip slope with specific characteristics that the Plan seeks to retain. The policy relating to affordable housing (Strategic Policy SD28) states that on sites with a capacity to deliver 11 or more homes, a minimum of 50% of new homes should be affordable, of which a minimum will provide rented affordable tenure. On sites that have capacity for between 3 and 10 houses the provision of affordable homes is on a sliding scale. Strategic Policy SD27 is also relevant to the TNP, as it sets out the mix of sizes of units that should be provided for both affordable and market housing.
- 3.12 Background evidence gathered to support the Winchester Local Plan – Part 2 is relevant to Twyford Parish. Several large housing allocations are proposed both in this Local Plan and plans relating to neighbouring authorities. These could have an impact on the B3354 which runs through Twyford. A Transport Evidence Base⁶ assessed the cumulative traffic impacts from the proposed developments

⁴South Downs National Park Authority - Updated Level 1 and Level 2 Strategic Flood Risk Assessment. AMEC (September 2017)

⁵Twyford – Flood and Coastal Defence Investigation Report Hampshire County Council (July 2017)

⁶B2177 B3354 A334 Corridor Cumulative Traffic Impacts: Winchester Local Plan Part 2 – Transport Evidence Base. (August 2015)

and gave a broad outline of potential mitigation measures. Junction 1, between the B3335 and the M3, is already over capacity in the morning peak. Improvements to the M3 will help to mitigate this issue but localised changes to the highway network are also likely to be required. The junction of the B3335 and Finches Lane/Hazeley Road in Twyford village is not currently at capacity. The study suggests that although there will be an increase in the volume of traffic at this junction it will not exceed its capacity up to 2031.

4. Habitats Regulation Assessment

- 4.1 The River Itchen is designated as a Site Area of Conservation under the Habitats Directive⁷. The site qualifies for designation for both habitats and species. The site contains the following Annex I habitat (in the Habitats Directive):-
- Water courses of plain to montane levels with the Ranunculionfluitantis and Callitricho-Batrachion vegetation. The Itchen is a classic example of a sub-type 1 chalk river.
- 4.2 It also contains the following Annex II species:-
- Southern damselfly (representing one of the major population centres in the UK);
 - Bullhead (high densities occur along much of the river's length);
 - White-clawed crayfish (though not a primary reason for site selection);
 - Otter (though not a primary reason for site selection);
 - Atlantic salmon (though not a primary reason for site selection);
 - Brook lamprey (though not a primary reason for site selection).
- 4.3 Plans and projects can only be permitted where it can be demonstrated that there is no adverse effect on the integrity of a site designated under the Habitats Directive. A Habitats Regulation Assessment (HRA) must be carried out to determine if the integrity of the site is likely to be affected by proposals in the plan. The main potential impact from the TNP is the allocation of 20 homes but policies to guide development could also have an impact on the SAC.
- 4.4 An HRA Screening Statement was produced by the South Downs National Park Authority (SDNPA)⁸ in April 2016 to determine whether the plan was likely to have a significant effect on the River Itchen SAC. The Screening Statement concluded that the proposals in the TNP were not likely to cause significant effects to the integrity of the River Itchen SAC. However, in coming to this conclusion, it took into account proposed mitigation measures for the TNP.
- 4.5 Following the People Over Wind and Sweetman v Coillte Teoranta (C-323/17) court case, which found that screening opinions in respect of the Habitats Regulations should not take into account any mitigation proposals, a revised HRA Screening Statement was produced⁹. This determined that an Appropriate Assessment of the TNP is required, and that the following policies should be assessed: SB1; SB2; HN2; HN3; HN5; HN6; HN7; BE3; CP3; DB1 and DB2. This work was carried out by consultants AECOM and a report received dated 2nd September 2019. This report concludes in paragraph 7.1 "For those policies brought forward for appropriate assessment the appropriate safeguarding policy wording should be added. With the above recommendations incorporated it is concluded that no adverse effect would occur on the integrity of the River Itchen SAC".
- 4.6 The appropriate safeguarding policy wording recommended is as follows:
- That wording is included in Policy WE1 that states new development within Flood Zone 3 will not be supported.
 - That a requirement is added to Policy WE2 that any applicant will need to provide a drainage plan to show that the drainage associated with the site will either utilise an existing mains

⁷The European Commission Habitats Directive 1992 aims to "maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community Interest". It is transposed into UK law in the Conservation of Habitats and Species Regulations 2010

⁸ Habitats Regulation Assessment Screening Statement: Twyford Neighbourhood Development Plan. South Downs National Park Authority (April 2016)

⁹ Insert date of revised Screening Statement.

drainage system at the nearest point of capacity or will be dealt with by a small package treatment plant (or similar). The supporting text should clarify that if the decision is to use a small package treatment plant, this will need to demonstrate that there is no hydrological connectivity from the proposed package treatment plant to the River Itchen. The plan should assess if there are existing watercourse, local drainage channels or a high water-table in the area of the proposed package treatment that will mean that the proposed package treatment would not be effective and would result in there being a high risk that phosphorous transferred into the protected watercourses (the River Itchen SAC and SSSI). If emission of phosphorous from the new development could not be prevented, the scheme would not be supported until a suitable solution is identified.

- 4.7 The above recommendations have been reflected in the wording of policies WE1 and WE2 in the Submission Neighbourhood Plan.

5. Key Sustainability Issues for the plan area

- 5.1 The baseline information in the Scoping Report and advice from the SDNPA and the Twyford Technical Committee has been used to draw out the key sustainability issues that are relevant for this parish. These are shown in Figure 1 and are presented as strengths, weaknesses, opportunities and challenges. These present opportunities through the development of the Neighbourhood Plan to achieve sustainability gains for the parish.

Strengths

- High quality and diverse landscape
- Rich ecology with European, national and local designations
- Extensive number of heritage and archaeological assets many with national value
- A long history of settlement in the area giving it a special quality
- Strong & active community with a range of facilities Excellent location close to major conurbations and with good transport links; with direct access to the M3, a railway station at Shawford and Southampton airport situated nearby
- Extensive employment within the parish including an industrial estate and a Preparatory School
- A good network of footpaths and bridleways providing links to the surrounding countryside

Weaknesses

- Potentially aging population
- Lack of smaller homes for young adults and families and to allow downsizing
- Lack of affordable homes with a disparity between local incomes and house prices and rents
- High quality environment restricts potential development sites
- Traffic using the B3335 as a through route from the M3 to communities to the south divides the village and creates a barrier to integration
- High traffic volumes and Heavy Goods Vehicles through the village causes congestion, noise and pollution and hazard through speeding
- High car ownership and use with pressure on car parking in the village centre
- A commuter area for adjoining urban conurbations and London
- Employment in the village largely provides jobs for non-residents
- Large private school in the centre of the village creates traffic issues
- Lack of evening bus service and dedicated cycle routes

Opportunities

- Provision of additional housing including affordable housing and smaller units for families and older people wishing to downsize
 - Provide traffic calming measures on minor roads in the parish
 - Ease parking problems in the village centre
 - Retain a vibrant community with a diverse population that can support local facilities
 - Provide extra protection for the parishes high quality built environment, archaeological assets and ecology
 - Detailed landscape assessment to ensure appropriately located development, with community support
 - Provision of facilities for young people
 - Safeguard local green space and key community assets
 - Raise the profile of valued heritage, wildlife and landscape assets of the parish within the SDNP
-

Challenges

- Allocation for a large scale employment site on the south west side of Winchester could affect landscape and biodiversity in the parish as well eroding the character of Twyford village
- Numerous allocations for residential and employment development in settlements to the south of the Parish (particularly at Colden Common and Eastleigh) would increase traffic on B3335
- New highway infrastructure to the south of the parish could indirectly impact on landscape and biodiversity
- Inappropriate development could have a negative impact on heritage and archaeological assets
- Potential for further commercial and employment development not related to the needs of the SDNP or Twyford would create demand for additional development and in commuting
- Pressure from visitors on local green space, footpaths/bridleways and facilities in Twyford
- Cumulative impact of housing extensions on village character and affordability
- New development could increase flood risk and could impact on groundwater quality
- Climate change could increase incidence and extent of flooding and impact on the high quality landscape

Figure 1 – Strength, weaknesses, opportunities and challenges for Twyford parish

The SEA Framework

- 5.2 The SEA Framework is in Table 2. The Framework is used to ensure that all relevant environmental and socio-economic effects from developing the Plan are identified. Another important aspect of the appraisal is to ensure that all reasonable alternative options for policy development or site selection have been considered. The appraisal assists in demonstrating that the most sustainable options have been included in the Plan.
- 5.3 The Framework consists of a number of objectives that reflect the three pillars of sustainable development – environmental, social and economic. They flow from the key sustainability issues for the parish and, therefore, ultimately from the baseline information and plans, policies and programmes. The assessment criteria indicate the questions that were used to consider each objective. This ensured a consistent approach was taken for the appraisal.
- 5.4 Once adopted the TNP will be monitored for the ongoing sustainability impact of the plan. The potential indicators listed in the following table could form part of the ongoing monitoring. Only the significant effects (both positive and negative) will be monitored and, therefore, not all of the suggested indicators are likely to be required. Some of the monitoring will be undertaken by the SDNPA and some by Twyford Parish Council.

Sustainability Theme	Objective	Assessment criteria	Potential Indicator
1) Landscape (Environment)	To conserve and enhance the high quality landscape character of the parish	<p>Will the plan protect key views in the parish?</p> <p>Will the plan ensure that the main landscape characters of the parish are conserved?</p> <p>Will the plan seek to retain the tranquil parts of the parish?</p> <p>Will the plan control lighting to retain and enhance the Dark Skies designation of the South Downs?</p>	<ul style="list-style-type: none"> • Number of applications with landscape enhancement conditions* • Number of applications that incorporate the recommendations from the Landscape Officer at the South Downs National Park* • Dark night status is maintained and enhanced

Sustainability Theme	Objective	Assessment criteria	Potential Indicator
2) Biodiversity (Environment)	To protect and enhance the fauna, flora and habitats in the parish	Will the plan protect and enhance existing species and habitats; such as chalk downland, woodland and riverine/meadow habitats? Will the plan ensure that designated sites and their settings are not adversely affected?	<ul style="list-style-type: none"> Condition of designated ecological sites Number of applications which include schemes to improve local biodiversity Provision of accessible greenspace to protect sensitive sites
3) Heritage assets and archaeology (Environment)	To protect, maintain and enhance the historic environment and archaeological assets of the parish	Will the plan ensure that development in the Conservation Area does not have a negative impact? Will the plan enhance current heritage features? Will the plan ensure that archaeological assets are protected and enhanced?	<ul style="list-style-type: none"> Number of applications that incorporate heritage enhancement or improvement schemes
4) Housing and the built environment (social)	To provide new affordable smaller homes to meet the parishes housing need To ensure that the design of new development respects the high quality built environment of Twyford and the rural areas of the parish	Will the plan seek to provide affordable homes with an emphasis on rental for local residents? Will the plan provide smaller homes (2 and 3 bedroomed)? Will the plan ensure that new developments have high quality design and layout?	<ul style="list-style-type: none"> Number of new homes built during the life of the plan* Number of new homes for rent* Number of new 1,2,3 and 4 bed houses constructed and as a proportion to the total built* Number of applications that are amended to improve the design and layout of the development
5) Accessibility (Social and Environment)	To increase the number of journeys by cycling, walking and public transport To improve safety for pedestrians in Twyford	Will the plan ensure that new development is located near facilities in the village centre? Will the plan ease the parking problems in the village centre? Will the plan support the implementation of pedestrian and cycling facilities? Will the plan reduce congestion and the speed of traffic on B3335 and minor roads in the parish?	<ul style="list-style-type: none"> Number of additional public car parking spaces* Number of new safe footways* Number of new dedicated cycle routes* Number of minor traffic management measures implemented* Number of highway accidents within the village* Reduction in traffic flows on B3335 through the village*
6) Community (social)	To support a vibrant and thriving community	Will the plan protect existing community, social, leisure, sport and health facilities? Will the plan encourage the creation of new open spaces?	<ul style="list-style-type: none"> Planning approvals which include provision for open space
7) Water (Environment)	To protect the area from flooding and the impact on water quality in the	Will the plan ensure that development does not increase the risk of flooding?	<ul style="list-style-type: none"> Number of properties affected by flooding*

Sustainability Theme	Objective	Assessment criteria	Potential Indicator
	groundwater protection zone	Will the plan that flood risk is reduced for existing properties? Will the plan ensure development does not impact on groundwater?	<ul style="list-style-type: none"> • % of residential applications approved in Flood Risk Zone 3* • Number of applications that could harm groundwater sources
8) Economy	To promote the provision of local employment	Will the plan provide opportunities for residents to be employed locally?	<ul style="list-style-type: none"> • Amount of employment floorspace compared to the current floorspace – ensure that this is not reduced*

Table 2–Sustainability Appraisal Framework

6 Appraisal of the Plan and Alternative Options

- 6.1 This is the main part of the SA where the policies and site allocations are appraised against the Sustainability Appraisal Framework. The “scoring” in Figure 2 was used to carry out the appraisal. This allows an overview to be given of the positive and negative effects of the policies and site allocations. This approach has also been used to appraise the reasonable alternatives for the strategic approaches in the plan as well as the proposed site allocations.

Strongly positive	Positive	Neutral	Negative	Strongly negative	Unknown/Uncertain
++	+	-	x	xx	?

Figure 2 – Scoring for the appraisal

Assessing the TNP Objectives against the SEA Framework

- 6.2 The appraisal process commenced with an assessment of the objectives in the Plan and those in the SA Framework to identify how compatible they are and if there are any areas of conflict. Figure 3 presents this compatibility appraisal

Sustainability Appraisal Framework Objectives	Landscape	Biodiversity	Heritage assets & archaeology	Housing & built environment	Accessibility	Community	Water	Economy
Neighbourhood Plan Objectives								
1. Village Character	✓	✓	✓	✓	✓	✓	✓	?
2. Vibrant community life	?	✓	?	✓	✓	✓	✓	✓
3. Dynamic village centre	?	?	?	✓	✓	✓	?	✓
4. Manage & reduce traffic	✓	✓	✓	✓	✓	✓	✓	✓
5. Built environment	✓	✓	✓	✓	✓	✓	✓	✓
6. Landscape character & wildlife	✓	✓	✓	✓	✓	✓	✓	?
7. Local needs	✓	✓	✓	✓	✓	✓	✓	✓

Compatible	✓
Potentially incompatible	?
Incompatible	x

Figure 3 – Compatibility between the TNP objectives and the SA Framework

- 6.3 The two sets of objectives are broadly compatible and a few potentially incompatible. In terms of the economic objective the latter arises where retaining the village and landscape character could restrict opportunities for employment. To some extent this is not surprising as one of the purposes of a National Park designation is to protect and enhance the landscape, biodiversity and heritage of the area. This is only potentially incompatible as the size and scale of any economic development would be relatively small. Policies in the Plan would need to ensure that appropriate employment opportunities can still be provided in the parish. However, it should be noted that the baseline

information indicates that much of the current employment in Twyford is not taken by residents of the parish, causing problems with traffic congestion at peak times.

- 6.4 Other objectives which are potentially incompatible are where new housing and development to support a vibrant community could impact on the landscape character and heritage assets in the parish. The dynamic village centre objective has the potential to conflict with biodiversity and water objectives. With the former this is because the objective refers to “other parts of the parish” which suggests development and facilities could be beyond the settlement boundary. In terms of the water objective the potential for conflict arises because of flood risk in parts of the parish and specifically in the village centre. In all of these cases detailed policies in the plan would need to ensure that the necessary checks and balances are in place to mitigate any negative effects.

Appraisal of the strategic aspects of the Plan – settlement boundary

- 6.5 The policies relating to the settlement boundary; SB1 and SB2 provide the strategic framework for the allocation of sites within the Plan. Policy SB1 defines the settlement boundary for Twyford village whilst SB2 contains a set of criteria for considering development outside this boundary. The spatial approach is to strictly control development outside the settlement boundary unless there is a need for a countryside and National Park location. This reflects the approach in the NPPF and the higher level Local Plans. In this respect there are, therefore, no reasonable alternatives to this overarching approach.
- 6.6 The current settlement boundary is defined in the Winchester Local Plan. The TNP proposes changes to this boundary following a review by a landscape consultancy. The review sought to ensure that the boundary is defensible and reflected the approach taken for defining settlement boundaries by the SDNPA¹⁰. The review proposed ten changes to the boundary and all were accepted by the Technical Committee and Parish Council. Appraising the options of retaining the current boundary and the revised settlement boundary is a reasonable alternative that should be tested through the SA.
- 6.7 It should be noted that the boundary would need to be changed to accommodate the sites allocated in the Plan as no sites were available within the current settlement boundary for housing or employment. This potential modification is not reflected in the settlement boundary in SB1 as this complies with the approach taken in the Winchester Local Plan; that the settlement boundary is altered after the development is completed. The implication of the changes to the boundary to accommodate the allocated housing site is appraised later in this section of the SA which considers the potential options for locating new housing development in the Plan.
- 6.8 The modifications to the existing settlement boundary are largely positive in terms of the sustainability objectives compared to retaining the current boundary. Housing and economy could be negatively affected as the boundary would generally be reduced in size apart from two sites where new housing developments have been completed (reference 2 and 7). A tighter boundary would restrict opportunities for development for new housing and economy. However, this impact is unlikely to be very significant as the restrictions to the settlement boundary are mostly minor modifications and the larger areas that are excluded have other environmental designations that would restrict development.

¹⁰Twyford Parish Landscape Assessment - Part 3: Settlement Boundary Review (February 2016). The Terra Firma Consultancy Ltd.

	SA Framework Objectives	Landscape	Biodiversity	Heritage assets & archaeology	Housing & built environment	Accessibility	Community	Water	Economy
Alternative options									
Retain current boundary		-	-	+	-	-	X	X	-
Amend boundary (SB1)		+	+	-	X	-	+	+	X

Figure4 – Appraisal of current settlement boundary and the amended boundary (SB1)

- 6.9 If the current boundary is retained there are two areas which have potential for development, (along Shawford Road between Norris’s Bridge and the Twyford Social Club (10) and in the area adjacent to the Manor House to the south of the village (8)). Development in either of these areas could have a detrimental impact on the landscape. The area around Norris’s Bridge provides a gap between Twyford village and Shawford to prevent coalescence as well as one of the key views identified in the Plan. The latter also applies to the land adjacent to the Manor House (along the B3335), as this a key view when entering the village from the south.
- 6.10 Reducing the boundary in these locations ensures development in these areas would be more strictly controlled; resulting in a positive effect on the landscape and heritage objectives in the SA. However, the areas which would be excluded from the settlement boundary are also within a Conservation Area so there would still be control on the design and layout of any development proposals in these areas even if they are retained within the settlement boundary. This means that the impact of changing the boundary would be neutral.
- 6.11 Biodiversity would be positively affected by the changes to the boundary as one of the proposed modifications would move it further away from an area of ancient woodland near Norris’s Bridge. The boundary change in this location is also positive in terms of the water objective due to the presence of Flood Zone 3 in this area. The current boundary means development could be permitted in this area having a negative effect on these objectives (though it is acknowledged that this would not be significantly negative due to other restrictive policies relating to these issues).
- 6.12 The change to the boundary to exclude the green space at the Bowling Club (reference no. 6) is positive in terms of community facilities as this would ensure that this recreation/sports field is more likely to be retained as it is outside the settlement boundary. The opposite argument therefore, applies to retaining the existing boundary; in that this open space could be lost to development if it was within the settlement boundary.
- 6.13 The changes would not have an impact on accessibility. It has been scored as neutral as this is a small settlement and the boundary changes would not impact on traffic or the ability to use sustainable forms of transport.

Appraising the strategic aspects of the Plan – housing numbers

- 6.14 Another strategic aspect of the Plan is the total number of allocated houses. Policy HN2 allocates land for 20 dwellings which reflects the number stated in the South Downs Local Plan. The Local Housing Need Survey identified 35 households with a local connection in need of housing locally. In order to provide 35 affordable houses approximately 70 dwellings would need to be provided in Twyford (as per policy SD26 in the South Downs Plan).
- 6.15 Testing the allocation of this level of housing for the Neighbourhood Plan is not considered to be a reasonable alternative. This is because the Plan must be in general conformity with higher level plans. Although the South Downs Local Plan allows neighbourhood plans to exceed their housing allocations, 70 dwellings would significantly exceed the number in the adopted Local Plan. To provide this amount of housing would require allocating several of the six sites that remained after the initial site selection process. However, all but two of these were dismissed on landscape grounds as a result of the conclusions of a Landscape Assessment. Given the location of Twyford village in a National Park, landscape impact is an important consideration in allocating sites for development and allocating these sites is unlikely to be in general conformity with the strategic policies of the Local Plan that require landscape to be conserved and enhanced in line with the purposes of the National Park. This is not therefore considered to be a reasonable option. Furthermore, although the TNP allocates 20 dwellings, more houses could be built during the life of the plan through windfall development and exception sites.
- 6.16 Another potential reasonable alternative at the strategic level could be to allocate both of the sites that were acceptable on landscape grounds in the Landscape Assessment. This would be the whole of site 1 and part of site 26 which in combination could accommodate 34 dwellings; with 20 on site 1 and up to 14 on a smaller area within site 26. Strategic Policy SD26 of the South Downs Local Plan states that 20 dwellings should come forward in the TNP but also says “Neighbourhood Development Plans that accommodate higher levels of housing than is set out above will be supported by the National Park Authority providing that they meet local housing need and are in general conformity with the strategic policies of the development plan”. Unlike the option for 70 homes, this option could be accommodated on the sites with a lower landscape impact and therefore could be in general conformity with the other strategic policies in the Local Plan. Therefore this option was considered to be a reasonable alternative and was tested against the option to allocate 20 homes. The results are shown below.

	SA Framework Objectives	Landscape	Biodiversity	Heritage assets & archaeology	Housing & built environment	Accessibility	Community	Water	Economy
Alternative options									
Option 1 Allocate 20 homes on site 26		X	-	X	++	++	++	X	-
Option 2 Allocate 34 homes on sites 1 and 26		X	-	X	++	+	++	X	-

It was suggested by the proponent of Site 1 in the Regulation 14 consultation that an option should be tested that would utilise the whole of sites 1 and 26 to their capacity. However, no evidence was submitted on what such a capacity figure would be. Site S1 is between 0.6 and 0.7 hectares (excluding neighbouring industrial site / employment land which has an extant permission for a care home) so a capacity of 20 homes would represent around 30 dwellings per hectare which would seem reasonable for its location. Allocating both sites for 20 homes each would provide a total capacity of 40 dwellings, the impacts of which are likely to be similar to options 1 and 2.

Option 1

6.17 The reasoning for the judgements on impacts on objectives for option 1 are set out in more detail in paragraphs 6.24-6.34 as this option is the same as option A for site selection.

Option 2

6.18 Option 2 combines the scores for options A and B for site selection (see paragraphs 6.35-6.37 below). For landscape, heritage and water its score reflects the potential impacts of site 26. Under housing both sites already scored strongly positive, but obviously 34 dwellings will have a greater positive impact on this objective than 20 dwellings. Under accessibility the combined score is positive, reduced from strongly positive for site 26 on its own because site 1 is less accessible and may therefore result in more vehicle movements. However, for community the score remains strongly positive because site 26 would still provide community benefits and these are not reduced by the addition of site 1. Overall Option 1 scores slightly better than Option 2 but if the greater positive impact on the housing objective is taken into account the options are broadly equal. It should be noted that paragraph 35 of the NPPF in respect of Local Plans states that they should select “an appropriate strategy” (compared to the previous NPPF which required that they select “the most appropriate strategy”) and it is considered that this can reasonably also be applied to how Neighbourhood Planning group use Sustainability Appraisals to inform their site selection. In this case the preferred option is Option 1, to allocate 20 homes in total.

Appraising the strategic aspects of the plan – site selection

- 6.19 A total of 36 sites were identified at the early stages of the housing site selection process. The TNP site selection process took place between January 2015 and September 2016 (see the TNP website www.twyfordneighbourhoodplan.com for details). The sites were identified via the following:-
- Invitation to villagers to suggest sites;
 - Sites listed in the Strategic Housing Land Availability Assessment¹¹ (SDNPA and landowners);
 - Mapping of sites by the Technical Team.
- 6.20 All of the sites identified for allocation went through a four stage process which included public consultation. One of the stages assessed the sites against the criteria used by the SDNPA in its SHLAA with the addition of the following four issues:-
- Whether the site was in active commercial or social community use;
 - If the site was in close proximity to the village facilities (shop school, doctor, sports etc.);
 - If the site could accommodate 11 dwellings, to secure on-site provision of affordable housing;
 - If the density of the development would impact on the character of the area.
- In addition, sites that could only accommodate 5 or less dwellings were not appraised further as these are considered to be windfall sites. This reflects the approach taken by the SDNPA.
- 6.21 The first stage site assessment reduced the number of potential sites to six which were then assessed by a landscape consultant to determine which were the most suitable on landscape grounds (there were actually seven sites but two of the sites were combined into one as they adjoined each other). The landscape assessment concluded that only one of the potential sites had no landscape impact. This was site 1 in the Site Selection Process which could accommodate 20 dwellings. Site 26 had some potential but only if part of the site was allocated, which could accommodate up to 14 dwellings. It would only be possible to allocate Site 26 for 20 dwellings if the whole of site 26 was developed and this was not considered acceptable in landscape terms.
- 6.22 Given the high landscape value of the parish this assessment is crucial in determining which sites would have a less impact on the landscape of the National Park. In this respect it would not be reasonable to appraise the sites that the landscape consultants discounted on landscape grounds. However, there are several options for delivering the 20 dwellings that the TNP seeks to allocate and maximise the number of affordable houses (though in one instance the figure is 22 dwellings). These reasonable alternatives are:-
- A - All 20 dwellings on site 26;
 - B - All 20 dwellings on site 1;
 - C - Split the provision of dwellings between site 1 and 26 with 11 on each site giving a total of 22 (this would maximise the number of affordable houses delivered on site);
 - D - Site 26 with 14 dwellings (as suggested by the Landscape Assessment) and 6 dwellings on site 1.

¹¹Strategic Housing and Land Availability Assessment SDNPA (December 2016)

6.23 The appraisal of all of these options draws heavily on Part 2 of the Landscape Assessment that was carried out by Terra Firma¹² which considered the potential effects on the landscape of the six preferred sites identified by the Technical Committee.

SA Framework Objectives	Landscape	Biodiversity	Heritage assets &	Housing & built environment	Accessibility	Community	Water	Economy
Alternative delivery options								
A/ Site 26 – 20 dwellings	X	-	X	++	++	++	X	-
B/ Site 1 – 20 dwellings	-	-	-	++	-	+	-	-
C/ Site 1 & 26 11 dwellings each	-	-	X	++	-	++?	X	-
D/ Site 26 - 14 dwellings/ site 1 = 6 dwellings	-	-	X	+	+	++?	X	-

Figure 5 – Appraisal of the site allocation options (without mitigation)

Option A

- 6.24 20 dwellings on site 26 would meet the figure stated in policy SD26 of the South Downs Local Plan. Given the total number of houses on the site this would maximise the number of affordable homes. It would, therefore, make a strong positive contribution to the housing and built environment objective of the SA. It is also directly adjacent to the village centre giving good access to services and facilities and some employment; making this strongly positive in terms of the accessibility objective. The number of dwellings delivered on this site, and all of the options where were appraised, are unlikely to have an effect on the economy of the village or wider parish; giving this a neutral effect against this objective.
- 6.25 The site could also include an extension to the adjacent village centre car park which is one of the objectives of the TNP. Due to high demand for parking in the village centre from, in particular, the surgery, pharmacy, the parish hall and the shop, vehicles overflow the car park and are parked on the street which contributes to traffic congestion throughout the day, especially at peak times. Hence, there is a need for additional off street parking in the village centre. The car park extension would, therefore, provide a community benefit as well as contributing to the accessibility objective. As the site is to accommodate open space this would also contribute to the community objective; giving a significantly positive effect.
- 6.26 Three SA objectives score negatively for this site; heritage assets, landscape and water. In terms of heritage assets this is because part of the north east part of the allocated site lies within a Conservation Area. The Landscape Assessment states that “any development proposal would need to ensure that views along the valley and from within the conservation area are protected”. There is also a Listed Building (Twyford School) to the north of the site which is currently well screened but potential impact on this building would need to be taken into account in the layout of the development scheme.

¹² Twyford Parish Landscape Assessment – Part 2: Housing Site Assessments (February 2016). The Terra Firma Consultancy Ltd

- 6.27 The Conservation Officer of the SDNPA subsequently provided advice on the potential impact of developing site 26 for 20 dwellings. They noted that the houses on the southern part of the site lie further from the boundary of the Conservation Area and would relate most closely to the existing car park and the non-heritage buildings that surround it. As these “would predominantly read as an extension of the existing built form along the lower slope of the valley they would have little impact to the conservation area and imply no harm to the conservation area setting”. They went on to state that the houses that could be located on the higher part of the site would be immediately adjacent to the Conservation Area. They would have some impact on the setting of the conservation area but would not have “substantial harm” provided that they are carefully designed and use appropriate building materials. These comments suggest that the potential negative heritage effects could be mitigated.
- 6.28 The negative effect of the site on the landscape objective is due to the open nature of the site (with the playing fields for Twyford School immediately to the east) and the fact and that the site rises to the north allowing views of this part of the site from the countryside to the south and east. At present this site gives an attractive entrance to the village along the Hazeley Road. The Landscape Assessment suggested that housing should be restricted to the south and western side of the site to reduce the impact of the development on the wider landscape. However, this smaller site could not accommodate 20 dwellings as well as an extension to the village centre car park and an area of open space. The proposed site includes a larger area with land fronting Hazeley Road but excluding the upper more exposed land.
- 6.29 Given the potential negative impacts of developing the whole of site 26 identified in the original Landscape Assessment, further advice was provided from the Landscape Officer at the SDNPA using an indicative layout prepared by Spindrifft (a consultancy) for developing this site for 20 dwellings. The Landscape Officer states that “whilst the development will be seen from some public viewpoints, I consider this *per se* does not generate harms as the site will be seen in the context of Twyford and in a pattern consistent with the settlement’s character”. They also noted that site 26 supports the existing settlement pattern of Twyford by reinforcing its nucleated form and the fact that houses step up the contours of the valley slope is also characteristic of Twyford. The comments go on to suggest mitigation measures that should be incorporated into the detailed design given the highly sensitive location of the proposed development. This includes ensuring that the housing scheme is exceptionally well designed so that it contributes positively to the Conservation Area and “puts a positive full stop to the settlement edge” to prevent further encroachment along Hazeley Road; as a linear form of development in this location would not reflect the settlement pattern and would impact on the wider landscape. The Spindrifft proposals include landscaping on land outside the development site but in the same ownership which could provide further potential for mitigation of views along and across the valley. They also recognise the wider landscape importance of the tree clump in the northern part of the site and its protection by a Tree Preservation Order. This area is designated as open space in the Spindrifft layout and further reduces the development area on the higher land. The sections drawn as part the Spindrifft layout were used to construct a photomontage to assist the Parish Council in its evaluation including identifying key viewpoints
- 6.30 The third potential negative effect relates to the water objective. The site is adjacent to Flood Zone 3 but the Plan states that a 10 metre strip immediately adjacent to Hazeley Road will be treated as within this Zone. The presence of Flood Zone 3 along Hazeley Road means that access to the site is at risk of flooding (access would be via Hazeley Road which is directly south of the development

site). Furthermore, there is a history of surface water and groundwater flooding in this location¹³. As well as the potential flood risk to the new houses, the development could increase the flood risk to properties near the site; for example by increasing hard surfacing.

- 6.31 The SFRA¹⁴ states that this site does not need to be subject to a sequential test (as defined in the National Planning Policy Framework). It does however, identify that a small area in the southern part of the site has a high/medium risk of surface water and ground water flooding, as well as Hazeley Road. It states that the site is suitable for housing provided that appropriate mitigation is implemented. The assessment goes onto make the following recommendations:-
- housing to be located outside the localised areas of potential surface and groundwater flood risk;
 - access to the site and internal site access roads to be designed to be compatible with potential surface and ground water flood risk;
 - a further site specific Flood Risk Assessment of surface water and groundwater flooding should be completed which could also consider the potential climate change impact of the lifetime of the development.
- 6.32 In terms of the first bullet point this means that the housing needs to be located away from the southernmost part of the site. This could be where the car park extension is located but it would need to incorporate a suitable surface material to reduce run off. The Level 2 SFRA indicates that sustainable urban drainage elements are suitable for the site and should, therefore, form part of the scheme to ensure that surface water discharge rates from the development do not exceed pre-development rates.
- 6.33 A Flood and Coastal Defence Investigation Report¹⁵ commissioned by Hampshire County Council, as the Land Drainage Authority, demonstrates that both non-engineering and engineering solutions are available that would reduce flooding in the development site and along Hazeley Lane. Twyford Parish Council has started to take this project forward. With the agreement and financial support of Hampshire County Council, the parish council has appointed consulting engineers to design a flood alleviation scheme, to include the associated costs. This will enable the Parish Council to decide on finance mechanisms. The report commissioned by Hampshire County Council demonstrated that there are options for mitigation which could reduce flood risk within the development site and alleviate the current flooding problems experienced in the area adjacent to the site, including the centre of the village. Since the earlier Sustainability Appraisal was completed, the Parish Council has moved forward with the Flood Mitigation Scheme in partnership with Hampshire County Council. The scheme has been simplified and made more flexible to enable it to be phased to achieve maximum benefit in line with available finance. The Parish Council is in discussion with the CIL authorities for grants and with landowners / developers on details of implementation and securing land.
- 6.34 Overall in terms of the SA site 26 would make a positive contribution to the community and housing objectives. It could deliver significant opportunities in providing affordable housing in an accessible location with open space and much needed additional car parking. However, it does have some

¹³Level 1 Update and Level 2 Strategic Flood Risk Assessment – Amec Foster Wheeler Environment and Infrastructure UK Ltd. for the South Downs National Park Authority (September 2017). This identifies that between 2&4% of the site has overlapping medium and high risk of surface water flooding within the south eastern part of the site.

¹⁵Twyford – Flood and Coastal Defence Investigation Report Hampshire County Council (July 2017)

constraints. Specialist advice suggests that the potential negative landscape and heritage impacts could be mitigated through appropriate design, layout and the use of suitable materials. The flood risk also needs to be mitigated. Solutions have been identified but further information is required on the costs of the engineering schemes to ensure that a mitigation scheme can be delivered. It is essential that the landscaping and flood mitigation measures are considered in tandem to ensure that the potential negative impacts of both issues are minimised.

Option B

- 6.35 Site 1 would also deliver 20 dwellings on one site; again providing the total figure stated in policy SD26 of the South Downs Local Plan and maximising the number of affordable houses provided for the village; making it strongly positive in relation to the housing objective. It would be neutral in terms of its impact on the landscape. It lies to the north of the Twyford village and abuts the existing settlement boundary with a modern housing development to the south and west. There is an existing employment site to the east. Although there is open countryside to the north and the site is in an elevated position, there is a significant tree line along the northern boundary of the site which restricts views of the site from the countryside beyond. The policy accompanying this site would need to ensure that the tree line is enhanced with additional planting and that this landscape strip is maintained.
- 6.36 This site is neutral in terms of biodiversity and heritage assets as no designated sites would be adversely effected. It is also neutral in terms of the water objective as the area is within Flood Zone 1 with a low probability of flooding and it is not susceptible to surface water flooding. It is neutral in terms of accessibility. The village centre and its facilities is approximately 700 metres from site 1. Pedestrian access would be down a hill via an intermittent and sub-standard footpath adjacent to the heavily trafficked B3335; and no further mitigation is in prospect. However, there is an employment site next to the proposed site and a bus stop. It is positive in terms of the community objective as the site is large enough to provide incidental open space as part of the development but is less positive than option A as the site is less accessible to the key community facilities including sports and parkland. Given the proximity to an existing enterprise park the site is positive in terms of employment.
- 6.37 Overall this site is positive in that it could accommodate 20 dwellings and maximise the number of affordable homes. It is likely to have less impact on the landscape than site 26, it has less risk of flooding and would not have any impact on heritage assets. However, it is not directly accessible to the existing facilities in the centre of the village and is likely to result in higher car usage to access facilities. Although open space could be provided within the site it would not deliver the same level of community benefits as site 26; namely the extension to the village centre car park and supporting measures to alleviate the flood risk along Hazeley Road.

Option C

- 6.38 This option allocates 22 dwellings across site 1 and site 26; with eleven units on each site. Eleven houses are above the threshold for maximising the number of affordable units on each site. This approach could possibly deliver the same number of affordable homes as option A and B. However, it exceeds the number of houses suggested for Twyford in the South Downs Local Plan by two units.

The advantage of this option is that the developed area within site 26 would be smaller, reducing the landscape impact (it would be within the boundary advocated by the Landscape Assessment). Indicative layouts suggest that this sized site could also accommodate the car park extension and open space.

- 6.39 The negative effects in terms of the SA objectives are on heritage and water. This is because even though site 26 would have a smaller area it still partly lies within a Conservation Area, is adjacent to Flood Zone 3 and is partly affected by groundwater and surface water flooding. The flood risk may be reduced with this option as the smaller total of houses these could be located further away from the southern part of the site which is prone to flooding (this area could accommodate the car park extension and some open space).
- 6.40 Overall this option would, therefore, have advantages in terms of landscape and flooding but less of the housing would be accessible to the village centre. With less housing on site 26 there may also be issues of viability and the ability to deliver the wider community benefits with the need for the development to pay for potential flood mitigation measures as well as the new car park and the affordable housing. The main issue with this option is that neither site would be developed to its maximum potential which is not an efficient use of the land.

Option D

- 6.41 This option allocates 20 dwellings across site 1 and 26 but with 14 on site 26 and the remainder on site 1 (6). This numerical split across the two sites might deliver slightly fewer affordable homes. The reduced number of houses on site 26 compared to option A would restrict development to the smaller site area proposed by the Landscape Assessment; thereby reducing the landscape impact. However, it is less certain than with Option C that all of the houses could be located away from the southern part of the site which is affected by flooding (there are 11 houses proposed for site 26 in Option C and 14 in this option). There would be a partly positive effect on the accessibility objective as the majority of the units would be located near to the facilities in the village centre but there would be some houses on the less accessible site 1.
- 6.42 Reducing the number of units on site 26 (compared to Option A) could have an impact on the viability of the scheme to deliver all of the affordable housing units as well as the car park, open space and flood risk mitigation. Furthermore, this would be a less efficient use of site 1 which can accommodate 20 dwellings. It could lead to a further application for the remainder of site 1 at a later date or construction of larger homes which would not provide the size of housing that is needed in Twyford; the provision of smaller homes is one of the objectives of the TNP.

Appraising the policies and alternative options

- 6.43 The same methodology has been used for appraising the policies in the Plan as that for the allocated sites. The results of the high level appraisal of the policies set out in Appendix 3 under each objective in the SA Framework. Overall there are no significant negative effects from the policies on the sustainability of the parish. However, there are some significantly positive effects. Some mitigation

measures and enhancements to the policies are suggested that would reduce the negative effects and strengthen the plan. These are set out in table 3 in section 7 of this report.

- 6.44 It should be noted that policies HN2 and DB1 have not been appraised as part of this process as these relate to the housing allocation and have, therefore, been appraised earlier in this report as part of the site selection process.
- 6.45 The reasonable alternative for most of the policies in the plan is the “do nothing” option. Without the TNP the same number of houses would be delivered in the plan area. However, the production of the plan allows greater control over the location of the allocated houses to maximise the number of affordable homes and also gives the opportunity to deliver wider community benefits. In terms of the latter without the TNP a larger village centre car park and additional open space provided by site 26 are less likely to be delivered. As well as these gains there are other community benefits that would not be delivered without the plan; such as facilities for community facilities and the protection of local green space and community assets.
- 6.46 Another concern for the parish is transport related issues; namely congestion and speeding traffic. The broad strategy of encouraging sustainable forms of transport would still be provided by higher level plans. However, the TNP seeks to address specific local transport issues such as the need for more car parking in the village centre to reduce on street parking and subsequent congestion. The plan contains a list of traffic calming measures to reduce traffic speeds as well as improvements for pedestrians and cyclists. Sites in the parish that are causing transport related issues (at Twyford Preparatory School and St Mary’s Primary School) are also less likely to be addressed without the TNP.
- 6.47 Protection and enhancement of the high quality landscape, heritage assets and biodiversity would be controlled by higher level plans. However, even with these issues the TNP enables local concerns to be addressed. For example, a policy to protect local gaps to prevent coalescence would also have a positive effect on the landscape and built environment. Ecological enhancement would be provided by the protection of local green space and the creation of wildlife corridors.
- 6.48 The final significant local issues that the TNP seeks to address relate to flooding and employment. With the former, the allocation of the site adjacent to Hazeley Lane (site 26) for housing gives additional potential to reduce flooding and sewer back up in the village centre (subject to the layout of the development and viability of the scheme). The engineering options for reducing the flood risk are a pre-existing issue and so are to be paid for by public finance, nevertheless the landowners have agreed to cooperate with the implementation of the scheme with land and engineering works. Other sources of finance are also required; grants of CIL are available from Winchester City Council, the South Downs National Park Authority and the Parish Council itself. In terms of employment, without the plan there is likely to be continued pressure to provide businesses in the area (though these would need to be appropriate to a National Park location). The existing businesses generate commuting into Twyford which adds to the congestion in the area and increases the pressure on the local road network. The TNP seeks to manage this issue; particularly by restricting and guiding development at Twyford Preparatory School and Northfields Farm/Hazeley Enterprise Park.

SA Framework Objectives	Landscape	Biodiversity	Heritage assets & archaeology	Housing & built environment	Accessibility	Community	Water	Economy
Policy and alternative								
Policy BE2	+	-	-	-	+	+	-	X
Alternative restrictive policy approach	XX	-	-	X	X	-	-	+
Policy BE3	+	-	+	-	++	+	-	X
Alternative restrictive policy approach	XX	-	X	X	X	-	-	+

Figure 6 – Appraisal of Policy BE2 and Policy BE3 and alternative options

- 6.49 There are two policy areas where another alternative approach was considered by the Technical Committee. These were on Northfields Farm and Hazeley Enterprise Park where the policy BE2 would restrict any changes of use within these areas. The alternative in this case was to have a less restrictive policy. The second policy is BE3 relating to Twyford Preparatory School where the alternative option was to allow development at this site without the restrictive criteria that are listed in the policy. Both of these alternative options have been appraised.
- 6.50 Both policies would make a more positive contribution to the local economy if the alternative of having a policy approach that would be less restrictive towards future development. However, accessibility would be negative for both policies as both sites contribute to local traffic congestion as employees, and in the case of the school, pupils, access these premises by car. With both premises these are not generally for residents from the parish.
- 6.51 The alternative policy approach is also likely to be significantly negative in terms of the landscape objective for both sites. The Enterprise Park is outside the settlement boundary and in an elevated position. Twyford School is also outside the settlement boundary and although much of the site is screened it is also in an elevated position. Development at the school also has potential for a negative effect on heritage assets as it is partly within a Conservation Area and there are Listed Buildings within and near the site. Finally, less restrictive development on these two sites could also have a negative effect on the built environment. For example, the policy on the Enterprise Park will only allow further development at this site along with the removal of the feed mill which would benefit the landscape and built environment in this area.
- 6.52 Overall the alternative approach of less restricted development for both policy BE2 and BE3 has the potential for a greater negative effect than the policy approach included in the TNP. However, the restrictive approach of these two sites needs to be monitored to ensure that this it does not unduly stifle employment opportunities in the parish.

Cumulative effects

- 6.53 Overall the Plan is not likely to have significantly negative cumulative effects. There is, however, the potential for some negative effects. The strategy of the plan to concentrate development in Twyford village could have a negative effect by increasing flooding and a detrimental impact on the Conservation Area and Listed Buildings. Flood Zone 3 is present in the village centre and there is a Conservation Area and Listed Buildings within the settlement boundary. However, the amount of development allocated in the plan and its location means that this effect is unlikely to be significant. In terms of flooding, policies in the plan will minimise the potential for these impacts with windfall development. However, flooding currently affects the allocated site and the proposed development site could increase flooding in the area. One study indicates that there is potential mitigation measures for reducing flood risk in the allocated site and further afield. However, these will need to be accommodated within the site alongside the other aspirations and will also need to be deliverable in terms of cost.
- 6.54 The amount of development that is likely to come forward through the proposed in the Plan (with both allocated and windfall sites) means that the cumulative impacts on landscape are not likely to be significant. Strong policies in the plan are likely to minimise any potential cumulative effect on landscape. However, the allocated site has the potential to have a negative effect on the landscape but this would not contribute to cumulative effect.
- 6.55 The policies in the plan generally balance the social and economic need for housing with the strong environmental constraints of the area. Hence, there are unlikely to be negative cumulative effects on the environment. The cumulative effects for the community are likely to be positive. This is not just in terms of affordable housing but also the provision of car parking in the village centre, new open space and the potential for new community facilities and addressing the traffic problems currently experienced in the village.

7. Mitigation and monitoring

- 7.1 The appraisal process has identified a number of potential negative effects. In terms of the allocated site there are potential flooding, heritage and landscaping impacts that need to be mitigated to ensure that the impacts are not significant. None of the policies are likely to have a significant negative effect. Nevertheless, there are some areas where even the less significant effects could be reduced and indeed, where the appraisal process has indicated that the plan could be strengthened.
- 7.2 Leading from the mitigation measures and enhancements is the aspects of the plan that should be monitored. This ensures that the potential negative effects of the plan are indeed reduced and the positive aspects of the plan are delivered.

Summary of the mitigation measures

- 7.3 The SA process should, where possible, identify mitigation measures where significant negative effects are likely, either from allocated sites or policies in the Plan. The following table summarises these measures. It should be noted that these are not all in relation to significant effects, but changes are suggested to reduce these potential lower level effects.
- 7.4 The other aspect of SA process is to enhance positive effects where possible which would add to the sustainability of the Plan. A summary of both of these aspects which were identified through the appraisal process is given in Table 3.

Site/policy	Issue	Mitigation measure/ Enhancement
Policy DB1/site 26 – land adjacent to the Parish Hall	Heritage impact - conservation area is adjacent to part of the western boundary of the site	Mitigate – ensure that views from within the Conservation Area are protected through the appropriate design and layout of the development and the use of muted tones for the building materials
	Landscape impact – edge of village location, rising to the north with an open aspect to the wider countryside	Mitigate – the detailed design and layout should make a positive contribution to the Conservation Area and provide an edge to the settlement. Provide a detailed landscape and visual impact assessment to demonstrate that the design and layout of the site along with appropriate landscaping minimizes the impact on the landscape. Provide additional planting on land to the east
	Flood risk - Flood zone 3 along Hazeley Road plus groundwater and surface water flood risk within the southern part of the allocated site	Mitigate as per the SFRA - locate housing away from the localized areas for potential groundwater and surface water flood risk - access to the site and internal site access roads to be designed to avoid potential surface water and groundwater flood risk if possible, or to incorporate mitigation measures - Twyford Parish Council to investigate potential to allocate partnership funding/resources towards flood risk mitigation projects within the wider catchment (especially downstream of the site) - complete a site specific assessment of surface water and groundwater flood risk, considering potential climate change impacts over the lifetime of

Site/policy	Issue	Mitigation measure/ Enhancement
		<p>the development and including the potential for surface water run-on from off-site</p> <p>- the site specific flood risk assessment should also confirm suitability or otherwise for filtration through Sustainable Urban Drainage Systems and assess the groundwater levels below the site. It should also demonstrate sufficient attenuation storage within the site, identify discharge routes from the site and agree the maximum discharge rates with the Lead Local Flood Authority or Southern Water (as appropriate).</p>
	<p>Outcome of the HRA Screening Statement - potential impact on water quality of the River Itchen with an impact on the SAC</p>	<p>Mitigate as per the recommendation of the HRA Appropriate Assessment. A Construction Environmental Management Plan coupled with utilization of standard control guidance is required for this site. This should be added to the policy as follows:</p> <p><i>vii. Adherence to a Construction Environmental Management Plan coupled with careful design and the utilisation of standard pollution guidance to ensure that adverse water quality effects on the River Itchen SAC is avoided.</i></p> <p><i>viii. A drainage plan must be provided to show that the drainage associated with the site will either utilise an existing mains drainage system at the nearest point of capacity or will be dealt with by a small package treatment plant (or similar) . If the decision is to use a small package treatment plant then the drainage plan will need to demonstrate that there is no hydrological connectivity from the proposed Package Treatment Plant to the River Itchen for example are there existing watercourse or local drainage channels or a high water table, in the area of the proposed package treatment plan that will mean that the proposed package treatment would not be effective and would result in there being a high risk that phosphorous transferred into the protected River Itchen SAC and SSSI.</i></p>
<p>Policy IDC1 – infrastructure and developer contributions</p>	<p>Policy identifies heritage protection as an infrastructure priority</p>	<p>Enhance - identify assets that could benefit from enhancement in addition to protection</p>
<p>Policy HN4 – exception sites</p>	<p>Potential landscape impact from sites for new affordable housing outside the settlement boundary</p>	<p>Enhance – add the need for a landscape assessment to the tests in the policy; make a specific reference to this issue in point 2 which indicates that a site specific sustainability appraisal should be undertaken</p>
<p>Policy HN5 – housing within the settlement boundary</p>	<p>Increased flood risk from infill or redevelopment proposals</p>	<p>Mitigate – add flood risk to the list of criteria in the policy for assessing infill or redevelopment proposals within the settlement boundary or add a reference to policy WE1 on flood risk in the supporting text</p>

Site/policy	Issue	Mitigation measure/ Enhancement
Policy MA2 - parking	Seeks to provide additional car parking which increases areas of hard surfacing and potential flood risk	Mitigate – add the need to use appropriate permeable surface to either the policy or the supporting text
Water and Environment section	Primarily focuses on flood risk and foul and storm water drainage	Strengthen – include a reference to ensure that development located in groundwater protection zones does not impact on ground water supplies

Table 3 – Summary of mitigation measures and potential enhancements to the Plan

Monitoring

- 7.5 The ongoing aspect of undertaking an SA is the requirement to monitor the significant effects of the Plan which has been appraised. This is to ensure that the mitigation measures are being effective and the positive aspects are also being realised. If this is not the case then action can be taken. Furthermore, this can then be used to inform future iterations of the Plan. The monitoring regime for the TNP is set out in Table 3 which includes the SA Framework.
- 7.6 The main aspects of the Plan that should be monitored are indicated with a * in Table 3 but are summarised below:-
- all of the indicators in relation to the number of new homes completed, the size of homes built and number of new homes for rent as these are potentially significant positive effect of the Plan;
 - all of the indicators relating to the accessibility objective as these are potentially significant positive effects of the Plan (particularly in relation to additional car parking spaces in the village centre);
 - the indicators relating to flooding and flood risk as this is a potentially negative effect of the Plan;
 - the indicator relating to employment floor space because the Plan is restrictive in relation to providing new employment. It is, therefore, important that existing businesses are retained or this could give rise to a significant negative effect in terms of the local economy
 - two of the indicators relating to landscape as this a potentially (although small) negative effect of the Plan.

8. Summary and Next Steps

- 8.1 This report presents the findings of the SA (which includes an SEA) for the Twyford Neighbourhood Plan. An appraisal has been undertaken of the strategic aspects of the Plan as well as the reasonable alternatives which were considered during the preparation of the Plan. This included changes to the settlement boundary and the main alternative options for sites to be allocated for housing. The policies were appraised as well as the “do nothing” scenario for the effects on the SA objectives if the policies in the Plan were not in place. Recommendations were made during the process for changes to the Plan that could strengthen it and also mitigate any potential significant effects, and these were incorporated into the final Submission Plan. Finally, a monitoring regime is included in the SA for monitoring these significant effects.
- 8.2 The SA is being published alongside the Submission version of the Neighbourhood Plan under Regulation 16 of the Neighbourhood Planning Regulations 2012 for a period of 6 weeks. Comments on the SA will be considered by the independent Examiner as part of the examination of the Neighbourhood Plan.

Appendix 1

Twyford Designated Neighbourhood Area Map



- KEY**
- South Downs National Park Boundary
 - Designated Neighbourhood Area
 - Within the National Park
 - Outside the National Park - Not Designated by National Park Authority

Scale @ A4 30,000
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 2014 Ordnance Survey 100050083

Designated
Neighbourhood Area:
Twyford

Comments received on the Scoping Report

The following tables summarises the comments that were received from the Statutory Consultees and other organisations during the consultation on the Scoping Report. It indicates the changes that have been made to this report and the as a result of these comments.

Consultee	Comments	Modifications
Natural England	Section 4.4 – Change Appropriate Assessment to Habitat Regulation Assessment (HRA)	Agree change; details of the HRA are included in the SA Report
	The SEA should reflect the need to protect water quality; specifically the issue of phosphates. Suggests that monitoring water quality should be added to the “condition of designated sites”.	Agree change; SA Framework mentions groundwater protection zone present in the parish
Winchester City Council	Cumulative traffic impacts of development along the B1277/B3354 corridor were considered in evidence for Local Plan Part 2. This would be relevant to this SEA.	Agreed: this information has been included in section 3 of the SA Report
	Significant housing developments are being considered by Eastleigh Borough Council	These are already referred to in the SA
Environment Agency	As some of the parish falls within Flood Zone 3a/b the allocation of development falling within either flood zone 2 or 3 should undertake the sequential test in accordance with the NPPF to ensure that development is steered to areas with the lowest risk of flooding. A Flood Risk Assessment would also be required alongside any planning application.	Noted; this is reflected in the Neighbourhood Plan and is highlighted in section 3 of the SA Report.
	Comments on the objectives for the Neighbourhood Plan	Noted but not directly of relevance to the SA process
	Surface water has the potential to seriously impact on the Twyford public water supply as the parish is within a Groundwater Protection Zone	Agreed; this information to has been included as an update to the baseline information in section 3 of the SA Report
	SWOT – opportunity to reduce flood risk through the appropriate location of development and use of flood resilient material. Flood risk should be a threat in its own right and not just under climate change. Additional threat is inappropriate development impacting on groundwater Source Protection Zone 1	Agree changes; water environment now has its own category in the Framework and climate change has been removed and groundwater protection has been included as an additional criteria
	Sustainability Assessment Framework – split flood risk from climate change	Agree changes; water environment now has its own category in the Framework and climate change has been removed
Historic England	It would be useful to have information on any issues that affect the historic environment at present via a detailed character assessment	No detailed information is available on the current historic environment. Resources are not available to complete a detailed character assessment in this parish

	SWOT – add how policies could address any existing issues e.g. lack of access to parishes archaeological monuments and historic places	Without a character assessment it is difficult to give a comprehensive view of how the plan could address any existing issues associated with heritage assets
	Sustainability Assessment Framework – add a criterion that measures whether development results in harm to heritage assets.	Agreed; change made to the Framework
	Sustainability Assessment Framework - add criterion to measure the effectiveness of design and layout on the high quality environment of Twyford	Agreed; a new criteria has been added
	Sustainability Assessment Framework - add criterion to measure sustaining key positive features through the character assessment	See previous comments on the character assessment
South Downs National Park Authority	Add information to the baseline information from the SDNPA Water Cycle Study which refers to a history of sewer flooding in Twyford	Agreed; the SDNPA Water Cycle Study is referred to in section 3 of the SA Report.

APPENDIX 3 Appraisal of policies against sustainability objectives

Strongly positive	Positive	Neutral	Negative	Strongly negative	Unknown/ Uncertain
++	+	-	x	xx	?

Note policies SB1, SB2, HN2, HN3, BE2, BE3 and DB1 are assessed in the main report as they have strategic alternatives.

1) Landscape - To conserve and enhance the high quality landscape character of the parish

On balance the policies in the plan are likely to have a positive effect on this objective; however, there are some policies that could have a negative effect.

Several policies could have a significant positive effect on this objective. Unsurprisingly these are mostly in the landscape, heritage and ecology sections of the plan. However, there is also a design policy (DE1) that could affect this. This is because one of the criteria in the policy seeks to ensure that the development makes a positive contribution to landscape character. Policy DB2 is also considered to have a positive effect on landscape due to the potential for improving the character of the area.

The housing policies have the potential to negatively affect this objective. Even though housing development will largely be focused within the settlement boundary there is still the potential that this could affect the wider landscape in locations where the existing boundary is open to the wider countryside. Exception sites could have a negative effect because these would be outside the settlement boundary. Although policy HN6 relates to housing in the countryside its impact on this objective would be neutral as it makes reference to the landscape policies in the Neighbourhood Plan. Similarly, policy HN7 has been assessed as neutral because the Orchard Close site is in the countryside and there are potential landscape impacts, but this is covered by a criterion in the policy. Policy BE2 has also been assessed as neutral because the site has an extant consent for a care home. There are opportunities for an alternative scheme to improve the landscape impact compared to the consented scheme, but this cannot be assumed at this stage.

Other negative effects could arise from policy BE1 as this allows development of business and employment uses outside the settlement boundary which could impact on the local landscape. This is offset by the wording in the policy which relates to sensitively sited signage.

Policies	HN1	HN3	HN4	HN5	HN6	HN7	BE1	ST1	CP1	CP2	CP3	LHE1	LHE2	LHE3	LHE4
Appraisal	X	X	X	-	-	-	X	-	X	-	-	++	++	-	+
Policies	LHE5	LHE6	WE1	WE2	MA1	MA2	MA3	MA4	MA5	SS1	PO1	DE1	IDC1	DB2	
Appraisal	++	++	-	-	+	-	+	+	+	X	-	++	+	++	

2) Biodiversity - To protect and enhance the fauna, flora and habitats in the parish

Several of the policies in the landscape, heritage and ecology section are significantly positive in relation to this objective. Policy DE1 is positive as this suggests that design and layout should respect green corridors and the use of landscaping should contribute to biodiversity. IDC1 is also positive as green space and ecological enhancement are mentioned as priorities for infrastructure priorities. PO1 is positive because pollution has a significant impact on biodiversity.

The negative effects from the housing policies on this objective are in relation to windfall, exception sites and housing in the countryside (HN3, HN4 and HN6). As the location of such sites is not yet determined there is the potential for a negative effect in relation to this objective as the biodiversity designations are outside the settlement boundary. This is most likely for HN4 which refers to exception sites outside the settlement boundary. HN7 also has negative effects due its countryside location and onsite biodiversity assets. Nevertheless, other policies in the Plan (and higher level Plans) mean that the effect is likely to be minimal and no mitigation measures are suggested.

Policies	HN1	HN3	HN4	HN5	HN6	HN7	BE1	ST1	CP1	CP2	CP3	LHE1	LHE2	LHE3	LHE4
Appraisal	-	X	X	-	X	X	-	+	-	-	-	+	-	-	++
Policies	LHE5	LHE6	WE1	WE2	MA1	MA2	MA3	MA4	MA5	SS1	PO1	DE1	IDC1	DB2	
Appraisal	++	++	-	-	-	-	-	-	-	-	++	++	+	-	

3) Heritage assets and archaeology - To protect, maintain and enhance the historic environment and archaeological assets of the parish

The effect of the policies on this objective is predominantly neutral. The most positive policy is LHE3 which directly relates to the protection of historical and archaeological assets. Policy LHE2 is indirectly positive by seeking to ensure that development contributes to the special character of the village. This is also the case with policy DE1 which seeks to ensure that development has high quality design appropriate to its location. Policy DB2 have positive effects due to the opportunity to improve the impact of the Staceys Garage site on the Conservation Area and nearby Listed Buildings. Policy HN5 recognises the need to preserve and enhance the Conservation Area. Finally, Policy IDC1 is positive because it identifies heritage protection as an infrastructure priority. This policy could be enhanced by identifying assets that could benefit from enhancements and not just protection.

Several of the housing policies have the potential to negatively affect heritage assets. Policies HN3 and HN4 relate to windfall and exception sites and HN8 relates to development of elderly persons facilities. All of these policies could have a negative effect on this objective as heritage assets and archaeology are located within and outside the settlement boundary. The other negative effects could be from MA2 and SS1. The former seeks to provide additional parking in the village centre which is near the Conservation Area and SS1 supports renewable energy which can have a negative impact on historic assets. As there are other policies in the Plan which would restrict the potential negative effect from the policies identified here no mitigation measures are proposed.

Policies	HN1	HN3	HN4	HN5	HN6	HN7	BE1	ST1	CP1	CP2	CP3	LHE1	LHE2	LHE3	LHE4
Appraisal	-	X	X	+	-	X	-	-	-	-	-	-	+	++	-
Policies	LHE5	LHE6	WE1	WE2	MA1	MA2	MA3	MA4	MA5	SS1	PO1	DE1	IDC1	DB2	
Appraisal	-	-	-	-	-	X	-	?	-	X	-	+	+	++	

4) Housing and the built environment - To provide new affordable smaller homes to meet the parishes housing need and to ensure that the design of new development respects the high quality built environment of Twyford and the rural areas of the parish

Overall there are numerous potential positive effects in relation to this objective, as well as a few negative effects. Unsurprisingly the housing policies in the Plan would be strongly positive in relation to this objective. Policy DB2 is uncertain because it may allow housing development but also facilitate alternative uses. Other positive policies relate to design. Policy DE1 seeks to ensure high quality design and layout for new development which would be positive in terms of the built environment.

Most of the landscape, heritage and ecology policies are negative in terms of this objective as protecting these environmental assets could restrict sites for housing. Whilst policy ST1 could have a negative effect because encouraging the provision of visitor accommodation could reduce the housing stock in the village and surrounding parish. This also applies to policy CP1 which seeks to ensure that open space is provided as part of development schemes, again potentially restricting the number of houses that could be provided. Finally, policy WE1 restricts development in areas at risk of flooding. Land both outside and within the settlement boundary is within Flood Zone 3 so restricting development on such land could negatively affect the provision of new housing.

No enhancements or mitigation measures are proposed to the policies in light of the potential negative effects on this objective. The negative effects are predominantly due to restricting housing development sites to ensure that the high quality of environment of the parish is protected and enhanced whilst also protecting new development from flooding. The Plan is, therefore, seeking to provide a balanced approach to development in the parish which provides appropriate housing and protects the high quality environment.

Policies	HN1	HN3	HN4	HN5	HN6	HN7	BE1	ST1	CP1	CP2	CP3	LHE1	LHE2	LHE3	LHE4		
Appraisal	++	++	++	++	++	++	-	X	X	-	-	X	-	X	X		
Policies	LHE5	LHE6	WE1	WE2	MA1	MA2	MA3	MA4	MA5	SS1	PO1	DE1	IDC1	DB2			
Appraisal	X	X	X	-	-	-	-	-	-	-	-	++	-	?			

5) Accessibility - To increase the number of journeys by cycling, walking and public transport and to improve safety for pedestrians in Twyford

Several policies would make a positive contribution to this objective. The Plan has a specific section on accessibility which includes promoting sustainable forms of transport that require additional infrastructure; for example, cycle routes and cycle parking (MA1 and LHE4). It also seeks to address traffic congestion in Twyford village. This is mainly caused by traffic and non-residents accessing Twyford School and Northfields Farm/Hazeley Enterprise Park with the addition of heavy goods vehicles visiting the latter site. Policy MA4 proposes a new access road to the Enterprise Park which would divert heavy goods vehicles away from the village centre. Policy CP2 and CP3 support measures to improve the access at St Mary's Primary School.

Congestion in the village centre is also exacerbated by on street parking due to the existing car parking reaching over capacity. Policy MA4 seeks to provide additional parking spaces in the village centre as well as ensuring that existing parking is retained and full provision is made in new development. The latter is also reiterated in policy HN6.

There are only four policies that are likely to have a negative effect on this objective. These are policies which allow development outside the settlement boundary which could add to the existing traffic congestion and pressure for off street parking (HN4, HN7 ST1 and CP1). Nevertheless, where policies allow development outside the settlement boundary there are strong controls to limit the amount of development which means that there are likely to be few developments that will not be accessible to Twyford or add significantly to the congestion in the village. Hence, no mitigation measures are suggested for any of the policies in relation to this objective.

Policies	HN1	HN3	HN4	HN5	HN6	HN7	BE1	ST1	CP1	CP2	CP3	LHE1	LHE2	LHE3	LHE4		
Appraisal	-	-	X	+	-	X	+	X	X	++	++	-	-	-	++		
Policies	LHE5	LHE6	WE1	WE2	MA1	MA2	MA3	MA4	MA5	SS1	PO1	DE1	IDC1	DB2			
Appraisal	-	-	-	-	++	++	++	+	++	-	-	-	+	-			

6) Community - To support a vibrant and thriving community

Positive contributions to this objective are interwoven throughout the Plan and there are no policies that are likely to have negative effects. The housing policies are generally indirectly supportive of the community objective as sufficient housing, and specifically affordable housing, is essential to a vibrant and thriving community. Housing development outside the settlement boundary should benefit the local community. The same is true for the policies relating to the economy. Opportunities for employment support a vibrant and thriving community. However, the plan does not seek to provide additional employment opportunities because the present employment sites in the village currently predominantly draw people into the village rather than generating local employment which brings additional pressures such as traffic congestion to Twyford. The Plan acknowledges the community benefits that sustainable tourism can bring.

Policies CP1, CP2 and CP3 directly relate to the provision of community facilities and, therefore, support this objective. CP1 seeks to retain existing provision and to provide new facilities and open space. CP2 and CP3 relate to St Mary's Primary School and support improvements to the school; particularly improved access which is currently poor which results in traffic congestion.

Although the landscape policies primarily relate to the environmental objectives of the SA some of them also support the community objective. Policy LHE1 seeks to prevent the coalescence of Twyford with neighbouring settlements which supports the community identity and cohesion of the village. In addition, policy LHE4 protects Local Greenspaces for community use and acknowledges the importance of other informal open spaces to the community.

The policies on mobility and accessibility are indirectly positive to this objective as they seek to reduce traffic congestion, reduce the impact of traffic on the community and provide parking for the village centre to assist access to community facilities in this location. Finally, the design and infrastructure policies are likely to be positive. DE1 is indirectly positive in seeking to create high quality public realm and IDC1 lists community facilities amongst the priorities to receive finance from the Community Infrastructure Levy. Policy PO1 supports this objective due to the health benefits of reduced pollution.

As none of the policies are negative in terms of this objective no mitigation measures are proposed and no changes to the policies are required to enhance the Plan.

Policies	HN1	HN3	HN4	HN5	HN6	HN7	BE1	ST1	CP1	CP2	CP3	LHE1	LHE2	LHE3	LHE4		
Appraisal	+	++	+	+	+	+	+	+	++	++	++	+	-	-	++		
Policies	LHE5	LHE6	WE1	WE2	MA1	MA2	MA3	MA4	MA5	SS1	PO1	DE1	IDC1	DB2			
Appraisal	-	-	-	-	+	+	+	-	-	-	+	+	++	-			

7) Water - To protect the area from flooding and the impact on water quality in the groundwater protection zone

The most significantly positive policies in terms of this objective are in the Water and Environment section. This section of the Plan could be strengthened by referring to the Groundwater Protection Zone which covers the whole parish (zone 1, 1c and 2).

All of the design and infrastructure policies are also positive (in some cases these are significantly positive) because they either seek to provide measures that reduce flood risk or do this indirectly through supporting renewable sources of energy which reduce greenhouse gas emissions which contribute to climate change. Climate change is likely to increase the flood risk in Twyford. The latter also applies to MA1 and MA5. These are indirectly positive as providing the infrastructure for walking and cycling would reduce greenhouse gas emissions. Policy PO1 is positive as reducing pollution would improve water quality.

LHE1 would have a positive effect on this objective as some of the protected gaps also fall within land designed by Flood Zone 3. Hence, this would provide a further restriction on development in this area. Likewise LHE4 would make a positive contribution as it promotes open spaces and green infrastructure which can assist with delaying and reducing surface water run-off. This indirect effect also applies to LHE6 which seeks to retain and enhance biodiversity.

Several of the policies could have a negative effect on this objective. However, none are likely to be significantly negative. HN1, HN4-7 could have a negative effect on this objective as these make provision for additional housing which could either make the current flood risk in Twyford worse or, depending on the location, the new houses could be at risk of flooding. Development outside the built up area boundary could affect water quality by impacting on the groundwater source protection zone. This relates to policies HN4, HN6, HN7, ST1 and BE1.

MA2 is negative as this seeks to provide additional parking which could not only encourage car use but also an increase in hard surfaces which if poorly located could increase flooding issues from surface water run-off. This could be mitigated by changes to the text or policy which makes reference to the use of permeable surface; depending on the location of the additional parking area.

Policies	HN1	HN3	HN4	HN5	HN6	HN7	BE1	ST1	CP1	CP2	CP3	LHE1	LHE2	LHE3	LHE4		
Appraisal	X	X	X	X	X	X	X	X	-	-	-	+	-	-	+		
Policies	LHE5	LHE6	WE1	WE2	MA1	MA2	MA3	MA4	MA5	SS1	PO1	DE1	IDC1	DB2			
Appraisal	-	+	++	++	+	X	-	?	+	+	++	+	++	-			

8) Economy - To promote the provision of local employment

Policies throughout the Plan are likely to have a positive effect in relation to this objective. Many of these are indirectly supportive. More housing with mixed tenure, including the provision of affordable housing, would support the local economy. Sustainable tourism (which is supported in policy ST1) could provide local employment. Policies MA1, MA2 and MA5 seek to secure transport and infrastructure improvements (including additional parking). This would be indirectly positive towards this objective as such improvements could provide improved access for people living in the parish to access local employment.

The Business and Employment policies are slightly negative as these reflect the approach in the Plan to restrict current employment uses as most employees are not residents of the parish. This is causing additional pressure on the village from increased traffic. However, the policies do seek to retain existing employment. As the desire to restrict additional employment is a strategic aim of the Plan no mitigation measures are proposed. However, this aspect of the Plan would need to be monitored to ensure that restrictive approach is not being detrimental to the local economy. Policy DB2 is shown as uncertain because it could be retained as employment or could be redeveloped for alternative uses.

Policies	HN1	HN3	HN4	HN5	HN6	HN7	BE1	ST1	CP1	CP2	CP3	LHE1	LHE2	LHE3	LHE4		
Appraisal	+	+	+	+	-	+	X	++	-	-	-	-	-	-	-		
Policies	LHE5	LHE6	WE1	WE2	MA1	MA2	MA3	MA4	MA5	SS1	PO1	DE1	IDC1	DB2			
Appraisal	-	-	-	-	+	+	-	-	+	-	-	-	+	?			