

- i) *Are the policies and proposals for growth and change in this area appropriate and justified, including in relation to the NPPF/PPG, and in terms of environmental, economic and social impacts?*
- 1.1 The proposals set out in Policies WIN 5 – 11 are not appropriate or justified. The information presented in the Sustainability Appraisal/Strategic Environmental Assessment is inadequate as a decision making tool.
- 1.2 The sustainability appraisal does not include a detailed assessment of the sites proposed to be allocated in the submission draft LPP2, rather information is presented for groups of sites in the different geographic areas of Winchester Town. Furthermore, it is not clear as to what assumptions have been made about each site. Notwithstanding the inadequacies of the document, it is clear that the redevelopment of Station Approach, Carfax and the Cattlemarket site (Policies WIN 5 – 7) will have a number of acknowledged major negative effects. These include:
- transport - congestion
 - water - location on a major aquifer of high vulnerability
 - heritage – Station Approach is adjacent to the Winchester Conservation Area and a number of listed buildings
 - pollution – all three sites are located within the Winchester town centre AQMA
 - trees – Station Approach contains trees subject to Tree Preservation Orders, removal of which could result in a loss of amenity value
- 1.3 Table 4.14 of the Sustainability Appraisal purportedly contains the reasons for selecting or rejecting sites in plan making. For Winchester Town it simply states *‘the following areas have been selected for allocation where there are specific requirements that need to be set out in policy:*
- Silver Hill*
Station Approach (includes sites 2009, 2450, 2588)
Abbots Barton (includes sites 2470, 2536, 2587)
Stanmore (includes sites 2589, 2103, 2586)’
- 1.4 This clearly is far from adequate and contains no justification whatsoever for the selection of the allocated sites. Furthermore, the document continues that sites outside the settlement boundary have been rejected as they are not required within the plan period, rather than concluding on the relative sustainability merits of each of the sites.
- 1.5 Paragraph 152 of the NPPF confirms that local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development and net gains across all three. Significant adverse impacts should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adequate impacts are

unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate.

- 1.6 The information contained in the SA/SEA confirms that there will be a number of significant negative effects on the environment. At the very least, the relevant policies should include a specific requirement to address the major negative effects as required by the NPPF. Whether it is possible to redevelop these sites without adding to the existing levels of congestion and worsening air quality is highly debateable.
- 1.7 Policies WIN5-WIN 11 should specify the requirement for the different land uses envisaged based on a thorough understanding of the impact that the development will have on the local highway network, urban design principles and viability. Without a detailed understanding of the capacity of the allocated sites and their likely contribution to meeting identified housing and employment requirements, it is impossible to determine whether these requirements have been met.
- ii) *Are they clear and deliverable, including in respect of the associated infrastructure requirements?*
- 1.8 Paragraph 173 of the NPPF confirms that Plans should be deliverable. The viability of proposals for Station Approach, the Cattlemarket and Carfax has not been tested and there is considerable uncertainty over their delivery.
- 1.9 Paragraph 3.7.19 suggests that the Station Approach area has the capacity to deliver over 100 new dwellings, more than 16,000 sqm of new office space and sufficient car parking to maintain public parking provision and serve the new development, but that these are not firm targets as development proposals will need to take account of capacity of the sites within the area, the various planning requirements and the need to deliver a viable scheme. This suggests that the evidence underpinning the allocation is inadequate. The Transport Assessment was produced in 2008/2009 based on 2008 data and is now woefully out of date as is the Economic and Employment Land Study, which was initially produced in 2007 and supplemented in 2009.
- 1.10 The policy should also include a reference to the need to ensure that the development does not have an adverse impact on the local highway network. The Andover Road junction is already at capacity; any additional development will compound this problem and contribute to the worsening standard of air quality within Winchester town.