

**Winchester District LPP2 – Public Examination**  
**Hearing Day 1 – 12 July (AM)**  
**Plan Background/Evidence Base/Sustainability**  
**APG Response**

**Matter 1:**

- iv) Has the Plan been the subject of suitably comprehensive and satisfactory sustainability appraisal [SA] and strategic environmental assessment [SEA] and habitats regulations assessment [HRA]?

**Summary**

- 1 The Alresford Professional Group (APG) view on the Winchester City Council Sustainability Appraisal (WCC-SA) with regard to New Alresford is set out in its submission (507873173) on the Publication (Pre-submission) Local Plan Part 2 (LPP2). Pages 16 – 34 provides a full explanation of APG's view that concludes:
- The WCC-SA does not meet the legal requirements for sustainability appraisal as derived from the SEA Directive and ruled in the High Court. Therefore policies NA2 and NA3 of LPP2 are unlawful.
  - The WCC-SA assessment conclusions are not evidence-based and specifically the conclusions on the Sun Lane site (277) do not reflect WCC's own information and judgements.
  - The WCC-SA fails to demonstrate how alternative sites are rated and compared. This lack of clarity translates to an obscure document that fails met good practice for public participation and contrary to the requirements of the Aarhus Convention.
  - The Alresford Professional Group's approach to Sustainability Appraisal for New Alresford (APG – SA) reaches conclusions that differ substantially from that of the WCC – SA – in that:
    - The southern part of the Sun Lane site performs very poorly in that it cumulatively has many more negative effects than other sites.
    - The Dean, The Avenue and New Farm Road (N) all cumulatively have positive effects.
    - The northern part of the Sun Lane site cumulatively has neutral effects.
- 2 The effect of this is that the current SA is misleading and if it were more soundly based – on the lines submitted by APG - the decision maker might

have arrived at different conclusions. **This could have led to an LPP2 with a different outcome.**

### **Sustainability Appraisal**

- 3 The purpose of Sustainability Appraisal (SA) is to examine the environmental, social and economic effects of a plan and **examine alternatives**. There is clear legal, policy and practice guidance to this effect. SA is critical to the decision making process in plan preparation and an SA that does not clearly articulate alternatives based on available evidence can lead to misinformed decisions.
- 4 Planning Practice Guidance advises that SA should cover reasonable alternatives and a summary prepared with a range of readers in mind and provide a clear, accessible overview of process and findings. The SA report should help to integrate different areas of evidence and to demonstrate why the proposals in Local Plans are the most appropriate.
- 5 The WCC – SA with regard to LPP2 Alresford policies – NA2 and NA3 specifically – has failed to follow above principles as demonstrated in the APG submission (507873173).
  - There is no examination of strategic alternatives for Alresford e.g. concentration of development or dispersal. The approach by WCC and APG reflect the different strategic alternatives. Any reasonable assessment would have considered each of these in relation to the Sustainability Objectives especially as APG have proposed an alternative strategy during the public consultation process since 2014.
  - Appendix VI pp 69-84 of the WCC – SA fails to articulate alternatives in a manner that the public and the decision maker can readily understand the social, economic and economic effects for each alternative, Moreover, there is no coherent explanation of how alternative sites perform in relation to each other in the Appendix.
  - On the other hand, the APG submission (507873173) on the contrary has demonstrated (pp 19-34) the inconsistency of WCC’s evaluation and proposed an alternative approach (pp26, 31-34)
  - Has not clearly defined ‘alternative’ sites e.g. treating the Sun Lane site as one unit when it evidently is not (507873173 p 25 para 6.4).
- 6 Further to the APG submission it is noted the WCC – SA failed to examine alternative employment sites to the Sun Lane proposal. Bearing in mind the significance of the employment allocation and its impact e.g. requiring a new junction on to the A31, it is surprising there is no systematic evaluation of other options. These could have included the explicit safeguarding/intensification of use of existing employment sites in the town including The Dean, Prospect Road, New Farm Road or; ‘do nothing’. The latter is an obvious candidate

bearing in mind that sufficient land and premises are available to cater for Alresford's current and future needs (507873173 pp 73-84).

- 7 It is unreasonable that the public and WCC were not presented with genuine and reasonable alternatives for both housing and employment development in Alresford that were articulated in a clear and readily understandable manner. It is clear from the legislation, policy and practice guidance and legal judgments this is an important purpose of SA. The effect of this not being done with the WCC- SA for Alresford is that the decision maker (WCC) has only been presented with a partial picture of the options for development in Alresford. The effect is that the decision maker was denied the opportunity of considering a different plan for Alresford.

**It is recommended that**

- **WCC acknowledge that the SA for LPP2 with regard to Alresford sites should not be relied on as meeting legal requirements.**
- **WCC should request that Public Examination of the LPP2 should not be concluded until a review of the SA of Alresford sites is undertaken, published and invited for comment by the public.**
- **WCC take into account the revised SA and public comments thereon and determine whether LPP2 with regard to Alresford be revised.**