

**Winchester District LPP2 – Public Examination**  
**Hearing Day 4 – 18 July (PM) New Alresford – Matter 9: Policies NA1-NA3**  
**Response by Robert Fowler**

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**Comment on these appendices:**

**The detail included with each of these Appendices is simplified to be succinct.**

## A) Site selection Methodology - Critique

1. This paragraph is included to expand the reasoning why the Plan is **Unsound**. It is unsound because the submitted SHLAA sites were not assessed equally and objectively and therefore not **Positively Prepared**
2. (Refer to the 'Initial Site Sieve-New Alresford and WCC Housing Site assessment Methodology.) Although there were various charts presented at public meetings showing all the potential SHLAA development sites in New Alresford the method of assessing each site variable was not the same. The whole Site selection process was not open to rational debate and to many members of the public it was completely obscure. Questions about the conclusions reached by WCC officers and presented at these meetings were rejected e.g. One site 2522 with a small number of units (c 65) was dismissed because it was considered by WCC to have difficulties of access at one point, (now disproved). Yet site 277 (Sun Hill) was given full marks despite having poor access and infrastructure to accommodate the much larger number of units. Another example is the landscape assessment. Site 277 is on a high ridge which can be seen across the Downs for miles and was assessed as having 'Most Sensitive' Landscape. Another site 1927 (New Farm Rd) & 2553 (New Farm Rd) was listed in a lower category as having 'Just Highly Sensitive' landscape. Yet in these cases and others, Site 277 was mysteriously considered to have the best ratings.
3. The same bias appears in the Site Accessibility Sheets where the Sun Hill site fails badly when accurate criteria is employed but is again selected overall. i.e Distance to town centre and other facilities; Refer to APGs 2015 Submission for details and explanation. Also no mention of ground water Protection Zone.
4. WCC claim that the Sustainability Appraisal is supportive of the Sun Lane site but many comments have been made to the extensive document demonstrating that its conclusions are inaccurate, not evidence based and were not fully taken on board during the Site assessments. For example the claim that Alresford was short of Natural Green Space, and that claiming that the use of Site 2552 would prevent constructing a Rugby Pitch. Both of these claims have been shown to be untrue. Two Rugby pitches were built before the SA was produced on site 278 north of Site 2552, and Natural Green spaces were found not to have been documented by WCC, such as Hassocks Copse within 500m of the Settlement boundary.
5. The Sustainability Assessment recommends air and Pollution surveys before any junction is built for the Sun Lane Site. This is not included in Policy NA3. The SA ( Page VI -78) omitted to consider the effect of the listed buildings on Sun Lane junction with Tichborne Down, (The Old Cricketers, Laundry Cottages and Stable cottages. Reference was made to 3 listed buildings in the text at page 170 but the reference referred to Denmead. Assuming it was a typographic mistake and should have been 176 the reference was really for 3 Listed buildings at Swanmore.
6. For these reasons and others the Sustainability Assessment is considered inaccurate & flawed and if used to back up WCC's claim that the Selection

of site 277 was the best choice then the Methodology must be seriously questioned.

7. Each variable on the Site Sieve was considered to have equal importance: This cannot be: Weightings should be applied to the various criteria and this should **not** be limited to just 8 variables. Additionally Sustainability should have been added to the criteria as well as vehicular impact; public transport accessibility (nor just does it have an exit on the adjacent Road); infrastructure and employment impacts.
8. Likewise the ability on the Sun Hill site to provide excessive Open Space should not have been an over-riding criteria. (It should be noted that the revised Needs Groups demonstrated that Alresford has sufficient natural Open Space without it.)

#### **B) Consultation Process:**

9. Little has been said by WCC about the public opposition to their Plan and the Site Selection Process. Over a period of 2 years and at every public meeting with the Town Council and WCC there has been an overwhelming opposition to the Plan. The formal Public consultations have verified this situation. (In December 2014 New Alresford residents submitted 565 objections to the Plan from c2400 households. By comparison Winchester Town received about 170 comments from a much larger population.
10. There were several carefully considered submissions made by the Sun Hill and Tichborne Down Action Group, the Nursery Road Resident Group and the Alresford Professional Group while the Council continued with their Plan unaltered taking none of the points on board. The key points raised by these groups have not been answered satisfactorily and there has been no meaningful face to face dialogue or discussion with these groups. Instead the response from WCC has been via its cabinet document CAB 27211 Appendix 'N' where effectively all the points were generalised with the original precise meanings lost and subsequently dismissed. This leads myself and other residents to conclude that the Plan was '**Predetermined**' from an early stage and was not objectively assessed against quality criteria. For example: A public meeting in May 2012 held by NATC showed slides with their preferred sites of the Dean and Sun Hill **before** the first consultation.
11. Many of these arguments discussed above in paras 1 & 2 were again made at the Pre-submission stage in December 2015 without any of the points being objectively assessed. The alternative suggestions and proposals would entail some building on site 277 together with two other SHLAA sites which could easily incorporate the remainder of the housing targets. These additional sites are next to the Town offices (site 2552) and 2 sites in New Farm Road (Site 1927). These proposals will distribute housing around the perimeter of the town and ensure traffic problems and social integration would be eased. The Policy does not objectively assess these alternative developments and infrastructure and is therefore **Not Positively Prepared**.

#### **C) Transport Assessments: SYSTRA**

12. Reference is made to the SYSTRA 2015 Report and also the Vehicle Trip

Calculations used by them (para 5.4.1), and those determined by actual surveys by residents in Alresford, which are higher. See Appendix F included with this document. The implications of the actual surveys is that Vehicle Trips for cars exiting a housing development of the same social mix are much higher. ( 0.5 versus 0.4 for SYSTRA) However, even accepting SYSTRA'S Trip figures, the report states that 154 vph depart from the 325 housing site in the morning peak and 36 from the Employment Zone. Yet on the diagram attached to the report it shows 135 vph leaving direct to the A31. In para 5.4.2 this is confirmed where it states that **“with the development assumed to connect directly to the new junction”**. It is therefore no wonder why the SYSTRA report claims that there is little or no effect on local roads. Despite this erroneous basis for the report it still reluctantly acknowledges in the report that significant movements of traffic will be generated along Sun Lane, Tichborne Down and Nursery Road from the housing and Employment Zone, if built. If the measured trip calculations for this area are used the figures could be much higher.

13. Some 503 vph movements in the morning peak are forecast for 2031 from the new development as a whole. (Para 5.4.1) However, SYSTRA are assuming that virtually none of these use Sun Lane and again this is because SYSTRA have assumed that most utilise the new A31 junction.
14. The Systra report also claims that 42% of all morning **work** peak trips in 2031 will go via the A31 junction to Winchester yet unbelievably only an extra 32 vehicle movements are shown along Sun Lane for the morning peak in 2031. This ignores social behaviour where individuals will go to the local Newsagent and shops before continuing on to work. Local experience indicates that most of this traffic will be local, school trips, shopping and social visits. In this case significant vehicle movements will be generated across town. None of these movements have been modelled or properly assessed and neither has any account taken of strategic traffic movements especially as there is much evidence of heavy goods vehicles crossing town.
15. Ref the Alternative Access Route proposal from Site 277 to B3047 alongside the railway line. From their own table 9.1 in their appendix; 11% of all morning work trips still travel to the East. The argument is based on **work trips only** and takes no account of the normal daily movements of householders, many (15%) who now work from home. With the exit from Sun lane blocked to northbound traffic and with the only other route being through Nursery Rd with traffic calming measures it is highly likely that the exit to the B3047 would become a significant escape route from Site 277 for those wishing to access the town facilities.
16. There are many unanswered questions relating to the Traffic Assessment including the closure of Sun Lane North at East street which will force many vehicles to traverse residential Nursery road and exacerbate congestion at Jacklyns Rd bridge. Systra's report refers to this at para 5.4.2 but the diagrams in their Appendix C do not reflect it (with 129 vph still going north in 2031). The diagrams are the mechanism from which the calculations have been made and the conclusions drawn and therefore the reports conclusions cannot be relied on.

17. As mentioned above, if the proposed restrictions to exit Sun Lane North are implemented then all the existing, new housing traffic and school traffic will be diverted through Nursery Road with its many parked cars. The alternative route south down Sun Lane and along Tichborne Down would involve extra Kilometres and increased pollution This would not be in accordance with NPPF para (29, 30, 37). I therefore contend that the plan has not been properly thought through and is therefore not consistent with Policy CP10 which states ***“The LPA will seek to reduce demands on the transport network...” and “... reduce emissions...”***
18. Forcing traffic from the East to continue past the 3 -way only junction and 'sling shot' round the A31 western roundabout and return so that it can enter the Employment Zone will also unnecessarily increase pollution. It is expected that HGV Drivers will ignore the signs and approach the site using the B3047 and traverse along Sun Lane thus causing safety problems at the junior and infant schools.
19. Traffic Flows measured at Key Junctions by residents are shown in Appendix F of this document. It worth emphasising the total quantity of vehicle movements passing through the town centre from all directions, especially North to South (from Cheriton to Basingstoke). None of this will be improved by an A31 junction at Sun Lane South. Systra's report did not show any measurements in Broad Street/The Soke (The only route north out of Alresford)

**D) Self employment levels:**

19. One of the conclusions of the Employment needs report was that future employment growth would be in home working and self employment. The report also concluded that there was no demand locally for traditional manufacturing and the associated premises as was first proposed by WCC at the LPP1 stage. Several years later the situation has changed both locally and nationally. The Needs Group also confirmed the APG Survey that business owners did not want to relocate to the bottom of Sun Lane.
20. The Fabrication companies in the Dean prefer to be located nearer to the Southampton-Portsmouth conurbations/transport infrastructure and their work force. Business with offices prefer to remain in the Town Centre where existing office rents in older premises are cheaper and the staff can access the retail facilities. This is why I and others consider that the Employment Land allocation is unnecessary and potentially damaging to the social and physical environment.
21. After closely examining the Census reports and correcting the over estimate of population growth by WCC it could be seen that Alresford with its Professional and Managerial base of 78% would be employed mainly in offices OR increasingly working from home with the benefit of High Speed Broadband. The conclusions of the Needs Group has now been substantiated with the latest publication of the Office for national Statistics at the e-link below.

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employe>

[ntandemployeetypes/bulletins/uklabourmarket/june2016.](#)

22. NB. Growth in 12 months to June 2016 209,000 to 4.7Million and now at a rate of 14.9%. (WCC Planned for 11%)

E) **Traffic Surveys:** See separate Appendix F for Excel tables.

23. A number of Traffic measurement surveys were carried out by residents in 2015. In particular the survey for Nursery Road/Sun Lane junctions and the West Street/Jacklyns lane crossroads are relevant. Additionally the surveys demonstrate that the Trip rates used by SYSTRA and the Developers Consultants taken from National records are low and not applicable to Alresford with a high proportion of motorised vehicle users. Figures obtained from local surveys show that local trip rate was in the region of 0.5 whereas the SYSTRA averaged trip rate was 0.4. Although this seems a minimal difference it can make a huge effect on the traffic impact.

F) **Excel tables; Traffic Surveys. See Separate Document**

G) **Trip Calculations Summary -See Separate Document**