



Winchester Friends of the Earth

20th December 2016

Mr Nigel Payne
Inspector
Examination of the Winchester District Local Plan Part 2

Dear Sir

I would like, on behalf of Winchester Friends of the Earth, to make submissions on Matters 1, 14 and 15. I am unable to attend for the first session, but I expect to be there for sessions 14,15.

Being anxious not to burden you with repetitious material I refer you to our letter of the 4th December 2014 for the bulk of the matter. I do not know whether that letter is before you, so I attach it to this submission. I am sure that our on-line submission to the December consultation is before you but I attach it here for completeness.

Friends of the Earth has a clear interest in all the environmental aspects of this Plan, so I should explain why we confine ourselves to only one part of it.

In the LPP1 we have expressed our views about the unsustainability and undesirability of many of the housing and development aspects of it, which seem to be directed primarily towards the interests of the developers, serving more artificially created demands than actual needs of the region and which act to the detriment of other regions of the country. The developers have unsurprisingly had the ear of government and the case appears to have been lost here as elsewhere in the south of England, without ever there being any real analysis of it. There seems no chance of our small voice making any impact on this planning free-for-all, when such august bodies as CPRE and the RTPI cannot be heard.

Of course we are concerned about climate change aspects of the Plan. In relation to source carbon we understand that fossil fuel extraction is a matter for the Hampshire Minerals and Waste Plan, rather than this District Plan and in any case the battle against fracking will be fought elsewhere than in any Plan examination. The use of carbon in domestic and commercial buildings and the generation of power are matters on which we have expressed views before (notably in relation to Silver Hill and Barton Farm), but we think we must cede the voice of reason on these matters in LPP2 to WinACC.

On habitats and biodiversity, on landscape and heritage there are more informed voices locally than we can muster.

So we confine ourselves to transport and pollution matters. Most of our concerns with these are covered by the previous submissions shown below. It remains for me to bring before you some developments since the December submission which reinforce our concerns on these matters and a planning precedent of which I have recently become aware.

Under Matters 1, 14 and 15 there are essentially questions of consistency with policy and the existence of a proper environmental and sustainability appraisal. Consistency with policy we take to include legality.

Legality: We hope we have made it clear that the problem of Air Pollution in Winchester is unresolved. Nor is there any prospect of it being resolved, but rather that specific developments within the LPP2, including Silver Hill, Station Approach and a new Car Parking Strategy, together with the now-inevitable traffic consequences of the ill-thought-out Barton Farm development, will ensure that the problem will worsen. A recent report for the City Council (Bureau Veritas: <http://www.winchester.gov.uk/environment/pollution/air-quality/>) has actually demonstrated that the problem is already more intractable than was thought, even before the traffic-generating aspects of LPP1 (especially Barton Farm) and the LPP2 come about.

Winchester City Council presides over an illegal level of air pollution. This is not a marginal offence; annual NO₂ levels are up to 60% over the legal threshold. It has a demonstrable health consequence – some 40 early deaths per year in Winchester. The City Council **has no consistent plans to tackle this**. Yes it states in the Sustainability Appraisal that there is an Air Quality Action Plan, but this has been in place for many years and has had no discernible effect. The key action of the action plan is to reduce traffic in the centre, something the City Council has consistently failed to bring about (as we detail in our previous submissions) and which it now proposes to abandon with its Car Parking Strategy. The latter is completely inconsistent with the Town Access Plan which also sits within the LPP2 as a policy document.

It will not do for the City Council to state as it does in LPP2 §3.7.3 (see 2014 submission below) that there is a balance to be drawn between keeping to the law and breaking it.

The Sustainability Appraisal mentions air pollution many times but glosses it over and then presents it as no real problem (§0.27):

It is considered that major negative effects on air quality are unlikely as a result of the Local Plan

This is simply delusional – a completely unevidenced and completely incredible statement. Again at §5.52:

It is considered that the combination of various policies provide suitable mitigation to ensure that there will be no major negative effects on air quality. The combination of policies are considered likely to lead to long term indirect positive effects on air quality though the promotion of more sustainable transport methods, more sustainable lifestyles, and an enhanced green infrastructure network.

This is gloss at the level of Professor Pangloss. Nowhere does the Sustainability Appraisal explain how this miraculous benefit will occur while the City Council does nothing to bring it about. Nowhere in the Sustainability Appraisal, or anywhere else in the Plan, or anywhere else in any communication we have seen, is there any evidence that there is any sort of real plan to achieve traffic reduction.

It is worse than this. The Sustainability Appraisal actually suggests that in the absence of the Plan (with its large traffic generating effects) Air Quality improvement could not be attained. §3.47:

*The diagram below depicts the likely evolution of the baseline **without the LPP2**:
Air quality could reduce further in the existing AQMA which could prompt further expansion or additional ones being made elsewhere*

Interestingly there is a paragraph (§5.47) in the Sustainability Appraisal that pays lip-service to the issue of cumulative effect:

Delivery of the projected growth of the District is likely to have cumulative negative effects on the topic of air quality, primarily through road traffic. This could lead to potential significant effects on the existing town centre AQMA. It is recommended that the Local Plan highlights the AQMA designation, and considers the necessary requirements to make development acceptable within and around the designated area.

Nowhere is there any attempt to suggest what these necessary requirements are, or how a Council that has so far been entirely unwilling or unable to address the current illegality, will somehow be able to tackle the problem that the Plan will make significantly worse.

Nowhere does the Sustainability Appraisal give a red ++ to the pollution problem as an '*absolute constraint*'. **If keeping to the law is not an absolute constraint, what is?**

Precedent:

Unless there is a clear commitment of the City Council to implement very significant traffic reduction in Winchester all the developments in the LPP2 that will materially increase traffic ought not to be allowed.

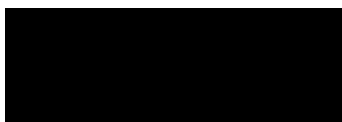
There was an Appeal decision last year (Appeal Ref: APP/D3830/A/14/2226987) concerning proposed development on land at London Road, Hassocks in Sussex, which we believe is relevant.

Inspector Louise Phillips decided against the developer appeal, citing air quality as a major issue:

Furthermore, I cannot be certain that the development would not be detrimental to air quality, and therefore to human health, within the designated AQMA. Consequently, it would conflict with the environmental role of sustainable development

It should be pointed out that the Sussex situation on air quality was much more borderline than it is in Winchester. Much of the discussion centred on whether modelling of air pollution was sufficiently good that it could be reliably asserted that NO₂ levels would not exceed the statutory limits. In Winchester we already exceed those limits by up to 60%; there is no plan to get them down and LPP1 and LPP2 in their implementation inevitably will lead to a much worse situation. I say **much worse** because we are now close to gridlock on many parts of the central circulatory system. Air pollution grows exponentially as traffic levels approach gridlock. In relation to Barton Farm traffic and the Station Approach car parking proposals there will be a particularly large burden of new traffic on the Carfax crossing, where gridlock already exists for significant parts of the day and where traffic already backs up into the worst polluted residential area of the City.

Yours faithfully



Christopher Gillham
for Winchester Friends of the Earth

4th December 2014

Head of Strategic Planning,
Winchester City Council,
City Offices, Colebrook Street,
Winchester, Hampshire SO23 9LJ

Dear Sir

LPP2

We do not make a lengthy point-by-point analysis of the LPP2 Consultation document, because it is our long and bitter experience that the Council pays no heed to anything we say, having never answered a single point that we have made in previous submissions on plans, pollution and transport matters. We have complained of this before, again to no avail. The Council continues to believe apparently that consultation is merely an exercise in public relations.

We restrict ourselves therefore to pointing out some of the more obvious objections we have to this Plan, not from any expectation that they will be considered, but in order that we may have a standing at a future public examination of this Plan.

Our primary concerns relate to the transport aspects of this Plan. In our view the Plan is significantly self-contradictory, fails to address many of the most important or urgent problems confronting Winchester City and introduces matter that elsewhere the Council declares is not in fact part of its plan.

LPP2 3.6.6 states that the Winchester Town Access Plan

focuses on improving accessibility and air quality, reducing the level of traffic in the city centre and therefore improving the situation in terms of localised congestion.

We reiterate a point we have made several times, but on which the Council never responds, that the WTAP promised (three and a half years ago):

Opportunities will be explored with a view to initially reducing car parking capacity within the Town centre by up to 15% which is around 500 spaces.

Bearing in mind that the City Council has undertaken (to Inquiry Inspectors and to the Highways Agency) to remove city centre car parking space for space for every provision of Park and Ride, except Barfield Close, totalling some 1800 spaces and that it has so far only removed about 53 spaces permanently.¹ The promise of WTAP remains unkept, but presumably, because it is stated as a background to LPP2 its promises are meant to be kept in this Plan.

¹ The closure of large parts of Friarsgate is considered only a temporary measure as the Silver Hill proposals replace Friarsgate plus quite a lot more car parking

Yet LPP2 3.6.7 states:

The objective is to retain parking capacity in the town generally at current levels, but the operation of the town centre car parks will be kept under review to assess whether there is potential for improvements and/ or consolidation. The Strategy recognises the potential to redevelopment [sic] several car parks within the town, including the surface car park in Chesil Street, but in the main the development potential of the other car parking sites is something that will be explored over the course of the Plan period.

The latter statement is ambiguous at best. Parking capacity ‘**in the town**’ presumably excludes the P&R capacity. So that retention of parking at current levels either means no car parking is going to be removed or new car parking will replace old car parking in the town itself. The only car parking that the Council appears to be considering for removal is precisely that car parking that seems to be irrelevant to the purposes for which car park removal was anticipated – at P&R inquiries and in WTAP – **the reduction of city centre traffic**. Chesil surface car park removal will have no such effect (indeed a certain amount of traffic that now uses it will be attracted past the multi-storey and into the city centre – so that traffic will actually increase there). The Cattle Market/Worthy Lane car parks are also obvious gateway parks for intercepting traffic before it gets to the city centre and the Plan appears to be going along with a scheme to develop those sites (and incidentally force extra traffic across the Carfax junction and dump it in Winchester’s second-most polluted area – the Westgate). This is such back-to-front traffic management that it can only be described as absurd.

We add to this the fact that the City Council is actively planning to increase car parking in the centre and the fact that no measures are being anticipated to counter the central traffic expected to be generated by the Barton Farm development.

Policy Win 1 says permitted development

iii) encourages sustainable transport options and contributes towards reducing carbon emissions and creating a green and environmentally friendly town.

Policy Win2 says permitted development

(iii) effectively mitigates adverse environmental or transport impacts within the town centre.

Since there is nothing in the Plan that does set out to provide sustainable transport options or addresses the adverse environmental impacts of existing transport, but several things which will distinctly worsen the problems (e.g. Silver Hill and Station Approach) these policies ring very hollowly. Nothing is foreseen that will address the ambitions of the WTAP:

- *to lead a transition to cycling, walking, public transport and low-carbon modes of travel, including low emission private and commercial vehicles.*
- *to reduce the negative effects of transport related carbon emissions on all neighbourhoods including the town’s historic environment, particularly in relation to air quality and the safety of pedestrians and cyclists*
- *to enhance the social and cultural wellbeing of Winchester by providing access for all.*

Access to Winchester City centre is now congestion-limited. All additional traffic attractors like Silver Hill and all additional origins of traffic like Barton Farm and Pitt Manor will simply spread the congestion throughout the day. Access by other healthy modes like cycling and walking will be impeded and actually made much less healthy. Access by the more efficient mode of bus transport

(including the P&R buses) will be impeded. Air pollution will continue to be unaddressed and will likely worsen (particulate pollution is actually rising already) disproportionately, by virtue of long periods of congestion.

In regard to the latter the Plan plays the Council's usual lip-service on pollution. We have at §6.4.37:

*Assessment of ambient air quality will be required for developments in any area identified as already failing to meet current National air quality objectives. Similarly an assessment will be required for any pollution generating development, **including associated transport impacts**, which could have the potential to cause an area to fail such air quality objectives.*

Apparently this stricture is to be placed on other people's developments but not on the Council's own commercial development at Silver Hill or its ambitions for further development at the Station area, both of which have obvious major traffic and pollution consequences.

We have also to repeat our objection to the specious language of 'balance' that the Council is so fond of using. For example at §3.7.3:

For example, the need to provide a sustainable transport network which recognises the needs of business, and residents from the rural hinterland, poorly served by public transport, must be balanced with the need to reduce congestion and improve air quality.

Leaving aside the assumption that there is anything in Council policy that actually aims at 'sustainable transport' or the dubious assumption that traffic restraint is harmful to the economy, the notion that the Council feels it is within its discretion to *balance* air pollution against the freedom of traffic to pollute is simply preposterous. The Council is **breaking the law on air pollution**. It has no discretion about the matter – it cannot decide there is a balance between breaking the law and keeping it. Nor is this a simple legal point, it is a moral one. Air pollution kills. Winchester's air pollution is at the level which takes away nearly 2 years of life expectancy from those subjected to it. Even if the Council believed the threat of paying large fines belongs to a distant future, it cannot distance itself from the moral responsibility.

Following the Winchester March on 29th November the Council published a response (<http://www.winchester.gov.uk/media/statements/march-issues-winchester-city-council-responds/>), which includes:

Plans for development at the Carfax/Railway Approach are another example of the way in which the Council is ruining the city.

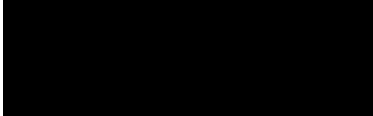
*There are opportunities for the City Council to work with Hampshire County Council and Network Rail to bring significant business investment into this area, delivering new jobs and greater sustainability for the local economy. **This idea is in the early stages, with no plans on the table at all**, so it is far too early for people to start criticising development. There will be full public consultation on any proposals.*

Despite this disavowal of any 'plans on the table', the LPP2 section on policies devotes 4 pages of a total of 14 (three of the ten policies) to something very specific – one base option with two sub-options for the station area, Carfax and the Cattlemarket. If the Council's response above is to be believed then this detailed matter should not be in the LPP2 at all.

Indeed we regard the level of concept detail provided with very considerable concern, since the argument (especially on transport aspects) is highly dubious. Proposed development in this area should not be biased by some spurious authority given it by a Local Plan anticipating a solution. It seems to us to be yet another example of a Council wishing to bounce Winchester into a 'big idea' without proper consultation.

We are especially concerned (as we have indicated above) by the implied willingness to do exactly the wrong thing on parking in the Cattle Market and the Westgate areas. We do not know whether the Tibbald's Access and Parking Report acts as a background 'evidence' report to LPP2, but we believe it should not do so, as it is seriously flawed in its arguments and 'analysis'. The idea that parking should be moved from the Cattle Market area towards Gladstone Street seems manifestly ridiculous to us and we hope that the Council are not seriously thinking in these terms.

Yours faithfully

A solid black rectangular box used to redact the signature of Christopher Gillham.

Christopher Gillham
for Winchester Friends of the Earth

Submission to the December 2015 Consultation

Response ID ANON-JH79-2KVK-Z

Submitted to Publication (Pre-Submission) Local Plan Part 2

Submitted on 2015-12-21 10:03:39

PERSONAL DETAILS

1 What is your full name or client's name if acting as an agent?

Name of respondent (or client)::

Christopher Gillham

2 If you are representing an organisation or acting as an agent, please provide the name below.

Organisation/Agent::

Winchester Friends of the Earth

3 What is your address?

House number/name::

[REDACTED]

Street address 1::

[REDACTED]

Street address 2::

Town/area::

Winchester

Post code::

[REDACTED]

4 What is your telephone number?

Telephone number::

[REDACTED]

5 What is your email address?

Email:

[REDACTED]

PRIVACY AND PUBLICATION

1 Please confirm that you have read and understood the above, and you consent to your submission being published.

Yes, I confirm I understand that my response will be published with my name and associated representation.

FUTURE INVOLVEMENT

1 If your representation is seeking a change, do you wish to participate by speaking at the Hearing sessions for the Examination?

Yes, I wish to speak at the Hearing sessions

2 If you wish to participate by speaking at the Hearing part of the Examination, outline why you consider this necessary.

Please provide any further comments or suggestions here::

I believe there are many issues (especially transport and environment related) that we wish to explore in the EIP

LEGAL COMPLIANCE AND THE DUTY TO COOPERATE

1 Do you consider that the Local Plan Part 2 is legally compliant?

No

Reasons why the Plan is not legally compliant.:

The Plan has many transport and car parking elements which make it impossible that the Council will ever achieve legality in respect of air pollution. It is currently breaking the law on air pollution; it is the subject of a European complaint; it has no plans to meet the requirements of either UK or EU law; it has made many

decisions, some of them as part of LPP1 that will inevitably lead to a worsening of the situation; it has new plans, within LPP2 (especially in relation to the station area) that will materially worsen the situation further. The single policy that might have addressed this issue, W6, is proposed for deletion, without any replacement policy that might address the issue at all.

The Plan clearly fails to even address let alone meet many of the stated objectives of the Sustainability Appraisal, especially in relation to Transport ('To increase accessibility; reduce car usage and the need to travel' - this is a plan seemingly designed to increase the use of cars); Health ('To improve the health and well being of all' this is a plan seemingly designed to increase air pollution, which already currently takes away nearly two years of life expectancy for those exposed to it in Winchester; it is a plan for car-dominated and congested streets, seemingly designed to reduce the possibility of healthy alternatives, such as walking and cycling); Climate Change ('To address the causes of climate change and to mitigate and adapt in line with Winchester's Climate Change Strategy' - this is a plan seemingly designed to increase transport carbon emissions; there is no real commitment to sustainable energy use); Pollution ('Minimise local and global sources of pollution' - for the reasons given above - this is a plan that not only does not seek to minimise pollution but actually puts in places policies that must increase it)

2 What change(s) do you consider necessary to make the Local Plan Part 2 legally compliant?

Changes needed to make Local Plan Part 2 legally compliant:

The Plan needs specific policies to guarantee reduction of traffic in Winchester city, at least to the level at which air pollution levels achieve legality and preferably to the level at which healthy (and almost certainly economically beneficial) alternative modes of access can be encouraged - this is mostly achievable through sensible car parking and car park price policy. The Plan needs specific policies to ensure local implementation of progressive reduction of carbon emissions in line with commitments made to the COP21 agreement. This must require reduction of motor traffic across the District. Walking and cycling strategies must be made real and not just lip-service aspiration.

3 Do you think the Local Plan Part 2 complies with the Duty to Cooperate ?

No

Reason why Local Plan does not comply with Duty to Co-operate:

The most common reason given by the District Council for its failure to adopt sensible traffic and car parking policy or to tackle air pollution is that the County Council is the transport authority and will not do anything. This is disingenuous - most of what is wrong with traffic and air pollution in the city of Winchester is due to the policy of the District Council. It uses the County Council as an excuse. There is a failure to cooperate but the failure is not one-sided.

We see no evidence that the District Council considers the air pollution problems in the District are important. If it did there would be evidence of cooperation between the District Council and NHS health providers seeking ways to reduce the health burden of local pollution.

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INTRODUCTION AND BACKGROUND

1 Do you consider that the Introduction & Background chapter is 'sound'?

No

Positively prepared, Justified, Effective, Consistent with national policy

2 Please give details of why you consider that the Introduction & Background chapter has not met the tests of 'soundness'. If you wish to support the 'soundness' of this part of the Local Plan, please also use this box to set out your comments.

Please provide any further comments or suggestions here::

The District Council has signally failed to carry out any significant or plausible traffic and transport analysis, neither for consequences of projected development within the plan (e.g. Silver Hill, Station area), nor for many other developments seeking and obtaining planning permission. Nor, most importantly, has it carried out any analysis of the likely combined effects of its various policies, own developments or permitted other developments on traffic conditions and pollution.

3 What change(s) do you consider necessary to make the Introduction & Background chapter 'sound' (positively prepared, justified, effective, and consistent with national policy)?

Please provide any further comments or suggestions here::

The Plan needs a proper transport analysis that models traffic in Winchester and computes the combined effects of proposed policy and developments. There has been a previous analysis rather out of date now - 5.39 of the Sustainability Appraisal makes reference to an MVA report commissioned by the City Council, supporting the proposals in the Plan. Yet the MVA report makes many recommendations on parking policy and sustainable transport that the Plan simply ignores, or rather seems in complete opposition to. It is hard to see how a Plan can legitimately cite as evidence a report that it not only largely ignores, but which it flies in the face of.

The Plan needs a sustainable transport policy that specifically undertakes to reduce traffic in Winchester.

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WINCHESTER TOWN - INTRODUCTION

1 Do you consider that the Winchester Town Introduction is 'sound' ?

No

Positively prepared, Justified, Effective, Consistent with national policy

2 Please give details of why you consider that Winchester Town Introduction has not met the tests of 'soundness'. If you wish to support the 'soundness' of this part of the Local Plan, please also use this box to set out your comments.

Please provide any further comments or suggestions here::

Transport policy in Winchester is incoherent and dishonest. It makes claims of encouraging sustainable and healthy modes of access and yet contrives to do the opposite. It makes claims that it is interested in reducing air pollution and yet continues to add to the problem.

LPP1 claimed to be incorporating the principles of the Winchester Town Access Plan which including a commitment to reduce city centre car parking by 500 spaces (in fact this is much smaller than the commitment the Council has made to the Highways Agency and which - in the Sustainability Appraisal - it acknowledges) which has now disappeared from the LPP2. The new Parking Strategy being cited is in direct contradiction with the Town Access Plan. How can LPP2 be sound if it is in fundamental disagreement with LPP1?

3 What change(s) do you consider necessary to make Winchester Town Introduction 'sound' (positively prepared, justified, effective, and consistent with national policy)?

Please provide any further comments or suggestions here::

The Council needs to get its access, traffic and parking policy together for Winchester town. It needs proper analysis of the town's traffic movements (a model) and a proper parking and public transport strategy for bringing about a sustainable access and movement pattern for the town and for bringing the authority into legality on air pollution.

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- Policy WIN1 - Winchester Town

1 Do you consider that Policy WIN1 is 'sound' ?

No

Positively prepared, Justified, Effective, Consistent with national policy

2 Please give details of why you consider that Policy WIN1 has not met the tests of 'soundness'. If you wish to support the 'soundness' of this part of the Local Plan, please also use this box to set out your comments.

Please provide any further comments or suggestions here::

Elements iv to vi of Win 1 are pious statements which bear no relationship to what LPP2 is actually proposing. Certainly where the City Council is talking about its own developments in Winchester, it shows no propensity to abide by these statements.

3 What change(s) do you consider necessary to make WIN1 'sound' (positively prepared, justified, effective, and consistent with national policy) ?

Please provide any further comments or suggestions here::

It needs to state specifically how it will bring about the desired aspects of Win 1. It needs to carry out a proper transport analysis and develop policies for traffic reduction, as indicated elsewhere.

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- Policy WIN2 - Town Centre

1 Do you consider that Policy WIN2 is 'sound' ?

No

Positively prepared, Justified, Effective, Consistent with national policy

2 Please give details of why you consider that Policy WIN2 has not met the tests of 'soundness'. If you wish to support the 'soundness' of this part of the Local Plan, please also use this box to set out your comments.

Please provide any further comments or suggestions here::

Item iii of Win 2 is manifestly not the intention of LPP2 as presently constructed. There are no plans to mitigate the effects of traffic and pollution in the centre, only plans to make them worse.

In 3.7.3: 'For example, the need to provide a sustainable transport network must be balanced with the need to reduce congestion and improve air quality, to recognise the needs of both businesses and residents from neighbouring villages poorly served by public transport'. This is typical of the disingenuous nature of District Council attitude to transport matters in Winchester. There is no reason at all to suppose that a sustainable transport network has to be balanced against reduced congestion and air pollution. A sustainable transport system (where access is dominated by efficient public transport, rather than inefficient and resource-wasting car-domination, and healthy modes of walking and cycling) provides greater overall access (good for economy), eliminates congestion, improves air quality and the quality of life in general for residents and shoppers and visitors and almost certainly improves the overall economic position of the town. To 'balance' this against some notion that it thereby limits access for people in the rural District who do not have access to public transport is a ridiculous, hypocritical and cruel canard. Those without access to public transport no more need to drive into the centre of the city than anyone else (P&R and gateway parking sensibly implemented would serve this small population) - and indeed it is the car-domination of transport policy that impoverishes public transport everywhere and leaves many more people in rural areas, without cars or the ability to drive them, less able to come to the town centre (or anywhere else) than people in the same situation a hundred years ago.

3 What change(s) do you consider necessary to make Policy WIN2 'sound' (positively prepared, justified, effective, and consistent with national policy) ?

Please provide any further comments or suggestions here::

The Plan needs to get rid of all reference to spurious assertions of 'balance'. The Plan cannot properly talk about a 'balance' between obeying the law on air pollution and not obeying it. It cannot assert a balance between action on transport sustainability and economic wellbeing when it has no evidence that the two are incompatible. It needs to consider the growing evidence that towns that are less car-dependent are actually more prosperous, instead of hinting the opposite. As indicated elsewhere the Plan needs a car parking and public transport policy that will bring about reduction of traffic and pollution in the centre. It needs a plan that will increase access of people and reduce the space allocated to vehicles instead of people. It needs a plan for truly sustainable transport and town access for everyone.

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- Policy WIN4 - Silver Hill

1 Do you consider that WIN4 is 'sound' ?

No

Positively prepared, Justified, Effective, Consistent with national policy

2 Please give details of why you consider that Policy WIN4 has not met the tests of 'soundness'. If you wish to support the 'soundness' of this part of the Local Plan, please also use this box to set out your comments.

Please provide any further comments or suggestions here::

Silver Hill has the effect of increasing car parking in Winchester centre and therefore increasing traffic and air pollution. By building multi-storey it effectively commits the town to long-term infrastructure which it will be politically difficult to remove in the way that ground-level car parking can be - it thus tends to build in the air pollution problem for decades. If the Council ever did consider it was its duty to obey the law and stop poisoning people, it could only do it by stopping the use of the car park - in which case it will have acted irresponsibly in the expenditure of public money.

Silver Hill is still a matter within our complaint to the European Commission on air pollution. This complaint is being investigated and the Commission has indicated that it will be prosecuting the UK government. The Government in turn has responded with an assertion that the problem will be dealt with, but without any indication of how. DEFRA has told the Council that any infraction fines levied against the government will be passed down to local authorities that have it in their power to affect air pollution. Air pollution in Winchester is entirely within the capability of the District Council to affect. This plan builds in Silver Hill; Silver Hill builds in worsening air pollution; this plan, if accepted by DEFRA therefore necessitates DEFRA approving illegality at the same time as passing on fines for that illegality.

3 What change(s) do you consider necessary to make Policy WIN4 'sound' (positively prepared, justified, effective, and consistent with national policy) ?

Please provide any further comments or suggestions here::

The car parking element of Silver Hill should be removed.

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- Policy WIN5 - Station Approach Area - Development Principles

1 Do you consider that Policy WIN5 is 'sound' ?

No

Positively prepared, Justified, Effective, Consistent with national policy

2 Please give details of why you consider that Policy WIN5 has not met the tests of 'soundness'. If you wish to support the 'soundness' of this part of the Local Plan, please also use this box to set out your comments.

Please provide any further comments or suggestions here::

Win 5 vll 'are consistent with the Council's adopted Parking Strategy and adopt a coordinated approach to the provision of car parking which ensures that the overall quantity of public parking spaces in the area is not reduced.' This is unsound for the reasons given elsewhere. The adopted Parking Strategy is incoherent and entirely inconsistent with other parts of the Plan that refer to the Winchester Town Access Plan; it is inconsistent with tackling air pollution and it is based on no proper evidence. The only evidence of traffic study cited is the MVA report, the conclusions of which are entirely inconsistent with the Parking Strategy.

3 What change(s) do you consider necessary to make Policy WIN5 'sound' (positively prepared, justified, effective, and consistent with national policy) ?

Please provide any further comments or suggestions here::

Section vlll needs complete revision. The Council must carry out a proper movement study before it goes any further on this. It needs to reconcile the contradictions of its current car parking strategy with its sustainability objectives and its Town Access plan. At the moment transport and access planning in Winchester is incoherent, poorly evidenced and dishonest.

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- Policy WIN6 - The Carfax Mixed Use Site

1 Do you consider that Policy WIN6 is 'sound' ?

No

Positively prepared

2 Please give details of why you consider that Policy WIN6 has not met the tests of 'soundness'. If you wish to support the 'soundness' of this part of the Local Plan, please also use this box to set out your comments.

Please provide any further comments or suggestions here::

As spelled out the policy is unexceptionable, but we know that the Council believes that a new car park on Gladstone Street should be built here. This is contrary to good transport policy because it moves car parking from a gateway car park to a central network already severely polluted. The reasons for suggesting this car park have been poorly evidenced, especially with poor traffic analysis.

3 What change(s) do you consider necessary to make Policy WIN6 'sound' (positively prepared, justified, effective, and consistent with national policy)?

Please provide any further comments or suggestions here::

The policy needs to state somehow that it does not provide additional car parking in the Carfax area. It needs to state that it will do something positive to reduce the pollution and congestion on the streets that approach it (Romsey Road and the Carfax crossing for example). It is hard to see how this can be done without a commitment to reduce the level of car parking here.

4 Upload Document

Upload documents here:

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- Policy WIN7 - The Cattlemarket Mixed Use Site

1 Do you consider that Policy WIN7 is 'sound'?

No

Positively prepared, Justified, Effective, Consistent with national policy

2 Please give details of why you consider that Policy WIN7 has not met the tests of 'soundness'. If you wish to support the 'soundness' of this part of the Local Plan, please also use this box to set out your comments.

Please provide any further comments or suggestions here::

The wording of Win 7 is unexceptionable, but the intention is unclear. The Cattle Market is a gateway car park. In a logical parking strategy that was concerned to reduce traffic in the centre and avoid the problems of congestion and pollution the first line of intercept of cars (after public transport all the way) would be park and ride and the second would be gateway parking on the edge of the centre. It is central car parking that the Council ought to be removing and has many times

promised that it would. But it has not done so and actually increased central car parking (and with Silver Hill intends to increase it more). On the other hand it has decided to remove one gateway car park in Chesil Street and is now flirting with removal of the Cattle Market car parking. This is back to front and unsound traffic policy. It is especially wrong when one considers that the new development expected at Barton Farm is destined to bring new traffic on to the Andover Road. The Cattle Market ought to be seen as a gateway car park for that traffic. Instead the Council is looking to move the car parking to a new multi-storey at Gladstone Street, which is in one of the most congested and polluted parts of the network and will involve increased trips across the already highly congested Carfax junction.

3 What change(s) do you consider necessary to make Policy WIN7 'sound' (positively prepared, justified, effective, and consistent with national policy)?

Please provide any further comments or suggestions here::

Make the Cattle Market serve as a proper gateway car park by re-opening the entrance on Andover Road so that it is the natural intercept for Barton Farm traffic.

4 Upload Document

Upload documents here:

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- Policy DM17 - Access and Parking

1 Do you consider that Policy DM17 is 'sound'?

Not Answered

2 Please give details of why you consider that Policy DM17 has not met the tests of 'soundness'. If you wish to support the 'soundness' of this part of the Local Plan, please also use this box to set out your comments.

Please provide any further comments or suggestions here::

3 What change(s) do you consider necessary to make Policy DM17 'sound' (positively prepared, justified, effective, and consistent with national policy)?

Please provide any further comments or suggestions here::

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SUSTAINABILITY APPRAISAL AND HABITAT REGULATIONS ASSESSMENT

1 If you would like to make any comments on the Sustainability Appraisal/ Strategic Environmental Assessment or the Habitat Regulations Assessment, please use the box below to make your comments.

Sustainability Appraisal/Strategic Environmental Assessment

Sustainability Appraisal and Habitat Regulations Assessment Comments:

The SA (0.27) dismisses air pollution as an issue: 'It is considered that major negative effects on air quality are unlikely as a result of the Local Plan. Policies seek to address the impacts of proposed development on the road network and encourage the use of more sustainable transport modes'. How does any policy within LPP2 do this? 'While there may be some localised impacts in the short term as a result of proposed development, the mitigation proposed through Local Plan policies should ensure that these are not significant'. There is no explanation of how anything in the LP will bring about such mitigation. Certainly the Council has made no demonstrable improvement so far and problems are worsening all the time. Silver Hill, Barton Farm and many other developments will have the effect of increasing traffic and pollution in Winchester and there is nothing in LPP2 to suggest that there are any measures or policies to mitigate.

'The Local Plan promotes a park and ride system to alleviate the pressures on Winchester Town centre'. In fact Park and Ride has not been used for this purpose. P&R can only work towards improving traffic conditions inside towns by removing equivalent amounts of car parking from the centre. The Council knows this and for each new P&R provision the Council has given undertakings (to inquiries and to the Highways Agency) that it would remove equivalent numbers of car parking spaces. It has not done so and it is clear from the LPP2 and other statements of the Council that it does not intend to. Moreover its own developments like Silver Hill will increase car parking in the centre. Also the Council has signally failed to make P&R work, probably because it does not charge enough for the central car parking alternative. Since its new P&R car park in 2010 the intercept of traffic (proportion of inbound traffic intercepted by P&R) has hardly changed. 'This has the potential for long-term positive effects on air quality'. This is a preposterous statement - if the Council wanted it to have an effect on air quality it would have taken the complementary measure of central car park removal.

The SA mentions 'combined effects' many times, but LPP2 makes no analysis of the combined effects of all proposed development on traffic and pollution. Table 8.1 'strong policies in support of public transport' - strong policies mean policies capable of making public transport significantly better - what is there proposed in the Local Plan that does this?

SA Appendix II: 'The HA [Highways Agency] would also suggest that parking standards within PPG13 are used as a maximum and where possible levels of car parking less than these should be adopted.

It is understood that Winchester are proactively reducing the amount of car parking

within the City and as I am sure you are aware, reducing the level of parking reduces

the attractiveness of travelling by car.' To which the Council response is 'Agreed'. The statement is actually untrue - the Council is proactively increasing the

amount of central car parking. It has been doing this all along while it has been telling the Highways Agency the opposite. So it is agreeing to a lie - unsound.

The SA consistently talks about traffic congestion in the peak hour 8-9a.m. This is such an unrealistically downplayed observation - parts of Winchester's network now suffers gridlock for several hours in the day.