

Session/Issue 1:

- i) Does the Joint Core Strategy [JCS] provide an appropriate spatial vision for the district over the plan period, consistent with national guidance in the NPPF and/or justified by clear and robust evidence and, if not, what is the best alternative and why?
 - ii) Has the JCS been the subject of suitably comprehensive and satisfactory sustainability appraisal [SA], strategic environmental assessment [SEA] and an appropriate assessment [AA] and if not, what else needs to be done?
 - iii) Will the strategy satisfactorily and sustainably deliver the new development needed to meet the objectives over the plan period and, if not, why not and what needs to be changed?
 - iv) Are any objectives, policies or proposals inconsistent with national guidance and, if so, is there a local justification supported by robust and credible evidence?
 - v) Is there clear evidence demonstrating how and why the preferred strategy was selected, including in terms of appropriate consultation with the public, representative bodies, neighbouring authorities, service and infrastructure providers and other interested parties?
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Question ii)

Friends of the Earth are not going to indulge in the sort of academic lecturing of which we are often accused, but we have a serious difficulty with definitions. Is a Sustainability Appraisal just one of those tick-sheets that someone fills up cynically and someone else dutifully reads and says '*well that's alright then*'? Or is it supposed to have meaning? And if so, what is the meaning?

The word '*sustainable*' has become the Humpty Dumpty word of our day, seeming to mean whatever the user wishes it to mean. It certainly has a real meaning to us, unlike the phrase '*sustainable growth*', which nobody who has ever used the term can define¹, or if some academics do, none of them have yet shown that economic growth can plausibly be decoupled from environmental damage.²

There are definitions of 'sustainability' which have fairly widespread acceptance. We are happy with definitions of the Brundtland type that essentially boil down to leaving our grandchildren the same choices we have. Appendix IV of the SA here appears to cite Stockholm, Johannesburg and Agenda21, all of which are informed by Brundtland principles.

So we ought to be able to look at the SA and at every one of the green highlighted items and suppose they mean the policy or the objective is consistent with Brundtland. We have to say that taken in this light a very large part of the Sustainability Appraisal has to be highly suspect.

We accept the framework of assessment and more-or-less accept the SA Objectives as defined (we cannot swallow the economic objective as desirable for the reasons of footnote ² or likely for reasons of post-Peak-Oil realities). We also accept that there are some aspects of Brundtland sustainability that are very difficult to pursue, with the best will in the world. For example the great bulk of existing housing exists in an energy-wasteful state, for which retro-fitting insulation has only very limited possibilities and replacement poses even greater problems of new embedded carbon.

¹ The meaninglessness of the term not stopping NPPF using it of course

² Indeed the only analysis of the coupling of which we are aware suggests that environmental sustainability is only consistent with a decline in world economic activity and a very large decline in the developed world's economic activity (contract-and-converge route to equitable sustainability).

It is also hard to do anything much about population growth and it is certainly not within the power of a local authority to do much. Though the housing demand calculations in the JSC are very largely³ due to it seeking to import population from other parts of the UK (for reasons we find hard to fathom), some of it at least comes from national population growth and new people need additions to housing stock. It is possible to build basic new houses with zero embedded carbon, old recycled embedded carbon and even with negative carbon (sequestered carbon in timber) but, for the most part, new housing at the moment is almost bound to be non-sustainable in the Brundtland sense – unrenewable resources are spent and denied to our descendants.

But the JSC has much more in it that is very much not in the direction of sustainability and quite wilfully so. We will have things to say on specifics under different issues, but we find it very hard to imagine how certain policies and plans of the JSC can be regarded as sustainable in any meaningful sense of preserving what we have for future generations. From Appendix IX (SA Matrices):

- 1) The wilful destruction of the crown of Bushfield Down takes away one of the important landscapes of Winchester. The last undeveloped downland on the west side of the Itchen Valley, crucial to the views from the edge of the National Park will be lost to future generations. The landscape impact of development is defined as ‘minor positive’ and having ‘no sustainability constraints’. Part of Cobbett’s finest landscape in England its destruction is deemed to be of ‘neutral’ heritage importance. The removal or at least severe restriction of an important recreational area much valued by the local population (as exemplified in the current attempt to get it classified as common land) is described as having minor positive health effects.
- 2) The development at Barton Farm which adds major congestion to an outer peripheral road and to an already congested junction on a radial route (without any mitigation proposed that will have any plausible effect) to the central circulatory system is described as providing minor positive transport effects. The same designation also seems odd in relation to a development which will almost certainly bring in a large element of population that will commute long distances. A scheme that on the developers’ own modelling will add more than 10% extra NO₂ pollution⁴ to a town centre that is already 25% over EU and UK limits (and without any plans by the City Council to improve it) is described as ‘minor positive’ for ‘health’. Barton Farm even seems to score positive on landscape grounds!
- 3) In relation to the Town Centre the Town Access Plan is deemed to make a minor positive contribution towards reducing car use and the need to travel. We know of nothing planned within the WTAP that will have any such consequence. We have asked and Winchester City Council has been unable to tell us about anything it will actually do to reduce traffic in Winchester. The Council moreover is currently going through a CPO Inquiry into its Silver Hill development ambition. This development deliberately adds traffic to Winchester and manifestly will increase NO₂ pollution in the centre (at that Inquiry they have not contested this). The SA then even goes on to ascribe a positive pollution benefit from the JCS in the town centre. And incidentally makes the misleading claim that air quality has improved since 2005 (what they should have said is that PM₁₀ has improved⁵ but that mean NO₂ has not improved at all). Also (Appendix VI CP2:15) a curious statement is made that seems to imply a progress that has not been made ‘*Winchester City has one AQMA which has reduced in size since 2005*’. The AQMA has not changed in size at any time.

Questions iii) and iv)

A problem we have with this question is that assertions can be made as to what are intended policy or objectives that sound unexceptionable, but carry little weight of credibility. One might get the impression over and over again in these documents that the City Council is in favour of reducing traffic in Winchester, of reducing the need to travel, of reducing the level of air pollution or of improving public transport alternatives. One might get the impression that the Core Strategy actually says they are going to do these things. But we have to live with the fact that the Council has promised such things for decades and never delivers any of it. So, for example, with every Park and Ride scheme introduced, assurances have been given that there will be complementary removal of city centre car parks by the time of schemes opening. Virtually none of this ever happens.

³ A significant element of the calculation, however, is to do with extrapolating the trend of declining household size. This trend is against the desirable route to sustainability and there is no reason for policy to support it by providing for such a perceived demand. In any case we think that economic realities are certain to halt and maybe even reverse this trend – house sharing and young people setting up their own homes later may be the new reality.

⁴ Implicated in significant asthma epidemiology.

⁵ Not as a result of any WCC policies, but because, nationally, technology has made engines more efficient in this respect.

The City Council has an Air Quality Action Plan, which absolutely recognises the need to reduce traffic in central Winchester. But no action has been taken in 6 years, even to move in this direction (and as shown in our response to Question ii the City Council's own development ambitions and its Barton Farm allocation will specifically worsen the problem).

Improve public transport alternatives are much promised in the JCS, as they have also been in the Local Transport Plan. But the reality is that support for bus services has been declining significantly. Even where such service support is promised as part of Section 106 deal for Barton Farm we discover that it is only to have a year or two's operation.

So there may be many policies within the JCS which are entirely consistent with government policy (to the extent that government policy is itself consistent), but for which we have no guarantee of matching action. We do not know what an Inspector can do about this but he should be aware of it.

We are preparing a complaint to the European Commission on the failure of the City Council to address the Air Pollution problem. In the lead-up to this we asked the Council to give us a statement about how, practically, they meant to comply with the EU and UK obligations and over what timescale. They replied but would not give us a statement about any practical plan.

If claims are made that it is policy to do something then those claims should be justified by hard, timetabled plans. Otherwise it is simple window dressing to give the JCS green-looking credentials. The implied question in iii) is as to whether the authority's judgment is good enough to secure deliverability. Our question, after long years of experience, is whether the local authority means what it says.

Question v)

We are sorry to say that our experience of the consultation processes in the City Council has not been a happy one. Indeed we made formal complaint last year in relation to the consultations on the WTAP. We pointed out that we had put huge effort and painstaking analysis into our detailed responses and were rewarded with a response document that ignored virtually everything we said. For our complaint we tabulated 31 pages of our original submission and the WCC responses amounted to two '*Noted. No change proposed*' and a single agreement to change the wording of a sentence to something that in our view was quite meaningless. We made the point: '*We believe that not a single substantive point that we made in that consultation has appeared in any way in the latest document. Clearly we do not expect that everything we say should be accepted by the Council planners. But what seems reasonable to expect is that if things we say are not accepted, there should be reasons given for not accepting them. We have never yet been accorded the courtesy of such response.*'

This we are sorry to say is the norm. We could do exactly the same tabulation with the Blueprint consultation. The Plans for Places document purports to describe what the public consultation responses have been, jumbled together, entirely trivialising things we have said and that we know other people have said, to the point that they can scarcely be discerned and then essentially provides a zero argumentative or analytical response. This is a Council that goes through the motions of consultation, but is almost never serious about listening to what is said.