

**STRATEGY/VISION/SUSTAINABILITY - Policy DS1****Session/Issue 1:**

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?**

1. It is considered that the JCS has not been subject to a suitably comprehensive or satisfactory sustainability appraisal (SA). Table 11.2 of the SA sets out a summary of the reasons why the various housing scenarios have been accepted or rejected. Section 3 of the document notes that economically based housing projections were observed to have positive effects, in terms of population, but the LPA felt that uncertain negative effects surrounded the potential capacity of services and infrastructure. Appendix X of the SA assesses the three potential housing scenarios considered, in respect of the economic and employment impact and finds that the 'economic led' scenario has very positive effect. However it rejects the economic-led scenario as it considers there to be uncertainty as to whether the economic led scenario could be delivered due to the atypical economic situation and because the scale of development proposed for the District may be difficult or expensive to mitigate by other policies and locational options.
2. The SA is short-sighted in its views as the JCS is planning for development needs to 2031, not just the immediate future. The SA fails to go into any more detail in terms of it being difficult or expensive to mitigate by other policies and locational options. **It appears that the LPA and its consultants were very quick to dismiss economically based housing projections; therefore this option has not been satisfactorily assessed.** Furthermore we would consider that Scenario 1 will be considerably more expensive to mitigate due to the requirement to 'import' workers into the District due to the resultant housing shortage of this scenario with less development contribution funding to help deliver the infrastructure. As we set out in detail in our response to Question 1 iv, the assumptions used for Scenario 1 are flawed in terms of its assumptions about making provision for enough homes to support the required labour force for the District therefore the SA cannot have been undertaken satisfactorily in this regard.
3. **Given that the PUSH South Hampshire Strategy (2012) was only recently adopted, and it appears that the LPA is intending to deliver to this strategy, it is not clear how the development apportioned to Winchester District through the South Hampshire Strategy was assessed through the SA or where these development numbers were accounted for in the 'scenarios' that were tested.** As the South Hampshire Strategy did not undergo a formal SA process itself (only SA 'lite') it appears that the additional development apportioned to Winchester District will not be subject to any formal SA as it currently stands.
4. In summary, the SA fails to ensure that the newly adopted South Hampshire Strategy development figures are incorporated into the SA scenario options. The SA also fails to provide further explanation as to what it means by the 'economic-led scenario' being difficult or expensive to mitigate and provide evidence that demonstrates this. Finally, the SA fails to explain what is meant by the 'atypical economic situation' as the JCS is surely not planning for an 'atypical economic situation' for the 20 year life of the Plan. Therefore we consider the SA to be inadequate and not capable of adequately assessing the preferred strategy of the plan.