Winchester Local Development Framework
Sustainability Appraisal (SA) &
Strategic Environmental Assessment (SEA)

SA SCOPING REPORT

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prepared by

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WINCHESTER CITY COUNCIL LOCAL DEVELOPMENT FRAMEWORK: SUSTAINABILITY APPRAISAL (SA)

SA SCOPING REPORT

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Sustainable Development

1. The aim of sustainable development is to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life for future generations. In order to help meet with this aspiration, our Government has prepared a Sustainable Development Strategy with a number of priorities for action:
   - Sustainable Consumption and Production
   - Climate Change and Energy
   - Natural Resource Protection and Environmental Enhancement
   - Sustainable Communities

The Local Development Framework

2. This sets out the Council’s vision, strategy and policies for planning and controlling land use in the district. The Council must prepare these development plan documents in accordance with certain legislation and guidance. The Local Development Framework helps to achieve the aims in the Sustainable Community Strategy. Sustainable development must be at the heart of planning and Sustainability Appraisal is a tool to help improve the sustainability of plans as they are prepared.

Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)

3. The purpose of SA is to promote sustainable development through the integration of social, economic and environmental considerations into the preparation of development plan documents (DPDs). It is an ongoing process that includes a number of key stages where both statutory and public consultation takes place. SEA specifically considers the effects of the development plan documents on the environment. It must predict and evaluate the significant effects of plans, including alternatives considered, and propose measures to offset any adverse effects identified. It is required by UK and European legislation that SA and SEA are carried out on the Winchester Development Plan Documents; the two assessments are integrated and known as Sustainability Appraisal (SA).

The SA Process

4. Government guidance sets out a staged approach to the SA process:
   - Stage A: Setting the Context and Objectives, Establishing the Baseline and Deciding on the Scope
   - Stage B: Developing and Refining Options
   - Stage C: Appraising the Effects of the draft DPD
Stage D: Consulting on the draft DPD and Sustainability Appraisal Report
Stage E: Monitoring Implementation of the DPD

SA Scoping and This Report

5 The Council is at an early stage of the SA process and this report details the activities that have been carried out to scope the issues and opportunities for sustainability and planning in the Winchester district area. This has involved searching out other plans and programmes that are relevant and considering their objectives; searching out information about the District and comparing it to other areas, the region and national information. Preliminary discussions have also been held with Council Members, various Officers in different departments and other key organisations, including the Environment Agency, English Heritage and Natural England. In this way, the Council is using the SA process to identify the particular characteristics of the Winchester area and the aspirations for sustainable development and planning.

6 This SA Scoping Report presents the findings of these studies relevant to the District and planning. Issues and opportunities for sustainable development were identified that should be taken into account when preparing the Development Plan Documents. This Report is for consultation and it asks interested people and organisations whether the scope of the SA is correct. At the end of this section are a number of questions asking whether consultees know of any other information that should be taken into account, consider the issues to be correct, and whether there could be any improvements to the proposed framework for assessing the Development Plan Documents?

Using the SA to Assist the Preparation of the Planning Documents

7 Issues and opportunities for sustainable development and planning have been identified through the scoping process. An initial draft list of SA Objectives that could help resolve these issues has been compiled and they cover issues such as transport and housing. For each SA Objective, a number of decision-aiding questions (or sub-objectives) have been drafted. These questions help make the SA specific to Winchester and help the appraiser by clarifying the detail of the sustainability issue to avoid duplication or omission.

8 This SA Framework of objectives and decision-aiding questions provides a way in which the sustainability effects of a development option or policy can be described, analysed and compared. Comments about whether each option or policy is likely to assist or conflict with each SA objective are recorded in detailed tables. Where any significant conflicts are identified, possible measures to offset adverse effects will be considered with recommendations – these could include a different option or a change in the wording of the policy.

9 The results of the SA will be reported for public consultation at the same time as the Development Plan Documents so that the difference the SA process has made can be reviewed. The SA Framework also
suggests some indicators and targets against which the sustainability performance of the LDF can be judged when it is adopted. This is part of an ongoing process to develop a Monitoring Strategy that is suitable for the LDF and the SA. Consultees are invited to suggest suitable targets and indicators.

Next Steps

10 Comments received on this SA Scoping Report will be reviewed and the SA Framework will be refined. The amended SA Framework will then be used to assess the emerging options for the LDF Core Strategy to deal with the issues for sustainable development and planning that have been identified. The Council will produce a report on the Issues and Options for the Core Strategy; this is programmed to be published for public consultation in the autumn of 2007. The results of the SA will be published at the same time.

How to Comment on this SA Scoping Report

1 Are there any key policies, plans or programmes missing from the Review?

2 Are there any additional key sustainability problems, issues or opportunities relevant to spatial planning and the Winchester district area for which sustainability objectives should be developed?

3 Are there any other relevant decision-aiding questions that could help with the Sustainability Appraisal?

4 Is there any further information available that could be used to help measure whether sustainability objectives are being progressed?

5 Which targets and indicators are most useful for future measurement of progress towards each sustainability objective?

The consultation period is 30th July to Friday 28th September. Please send responses to:

Strategic Planning Team, Winchester City Council, City Offices, Colebrook Street, Winchester SO23 9LJ
Introduction

This Report

1.1 This is the Scoping Report for the Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA), of the Winchester City Council Local Development Framework (LDF). The report sets out the key sustainability issues and objectives for the District with regard to spatial and development control planning. It seeks to promote dialogue through consultation to confirm the priorities for sustainability and planning that should be addressed during the preparation of the LDF documents. Sustainable Development is fundamental to Government policy and Sustainability Appraisal is a tool to help make plans more sustainable. In early 2007, the Council appointed independent sustainability specialists, Enfusion Ltd, to undertake the SA/SEA work.

Requirements for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)

1.2 In accordance with the Planning Act, Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs) in the Local Development Framework must be subject to Sustainability Appraisal (SA). Local Development Documents (LDDs) are also subject to Strategic Environmental Assessment (SEA) in accordance with European and UK legislation.

1.3 Government guidance advises an approach that integrates these requirements for SA and SEA. This involves extending the breadth and detail of the (predominantly environmental) issues required to be considered under SEA to cover the full range of factors (often interconnected) for sustainability. Throughout this report where reference is made to SA or the SA Report, it denotes Sustainability Appraisal under the Act, incorporating the requirements of the SEA Directive.

Sustainable Development (SD)

1.4 The aim of the UK Strategy for Sustainable Development is to ‘enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life of future generations’. It outlines five shared principles to be used for sustainable development to progress towards sustainability:

- Living within Environmental Limits
- Ensuring a Strong, Healthy and Just Society
- Achieving a Sustainable Economy
- Promoting Good Governance

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1 Planning and Compulsory Purchase Act 2004
2 EU Directive 2001/42/EC on the assessment of the effects of certain plans and programmes
3 SI No 1633 Environmental Assessment of Plans & programmes Regulations 2004
4 Sustainability Appraisal of Regional Spatial Strategies & Local Development Documents, ODPM 2005
1.5 The priorities outlined for immediate action across the UK are:
- Sustainable Consumption and Production
- Climate Change and Energy
- Natural Resource Protection and Environmental Enhancement
- Sustainable Communities

The Purpose of SA/SEA
1.6 The purpose of SA is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of DPDs and SPDs. SA is an iterative, ongoing process that is integral to plan making; especially prominent are the priorities outlined in the UK Sustainable Development Strategy. The SA process also considers measures to monitor the progression towards sustainability of the LDF during its implementation. SEA specifically considers the effects of the emerging LDDs on the environment. It must predict and evaluate the significant effects of the documents, including alternatives considered, and propose measures to offset any adverse effects identified.

The SA Process
1.7 The SA Guidance sets out a staged approach to the SA process:
- Stage A: Setting the Context and Objectives, Establishing the Baseline and Deciding on the Scope
- Stage B: Developing and Refining Options
- Stage C: Appraising the Effects of the draft DPD
- Stage D: Consulting on the draft DPD and Sustainability Appraisal Report
- Stage E: Monitoring Implementation of the DPD

The SA, the LDF and the Sustainable Community Strategy
1.8 The LDF is the spatial expression of the Sustainable Community Strategy. The LDF and the SA also take into account the objectives of other relevant plans and programmes, including key documents such as the WCC Corporate Strategy and the South East Plan; the ongoing and iterative relationship between the SA and LDF processes is outlined as follows:
1.9 The LDF is also subject to Habitats Regulation Assessment (HRA) under the European Habitats directive\(^6\) that protects habitats and species of European ecological importance [Natura 2000 sites - comprising Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)]. HRA is carried out in 3 stages, the first of which is initial screening to determine whether an Appropriate Assessment is required. Although HRA/AA screening is reported separately, it has been carried out at the same time as SA scoping to accord with Government guidance for integrated appraisal.

1.10 There are a number of requirements for assessments and monitoring of various Council documents, including Equality Impact Assessment (EQIA), Health Impact Assessment (HIA), Comprehensive Performance Assessment, and the Annual Monitoring Review (AMR) for the LDF. Accordingly, opportunities for synergies and integration of assessments have been sought wherever possible. The approach taken to the

\(^6\) (92/43/EEC) on the Conservation of Natural Habitats and Wild Flora and Fauna
Sustainability Appraisal for the LDF has been developed through a series of consultations with Council Members and Officers into a Corporate Sustainability Assessment method. A Strategic Flood Risk Assessment (SFRA) is being carried out of the Winchester district area in accordance with PPS25 Development & Flood Risk and this will be a key consideration during the SA/SEA assessment processes. Health Impact Assessment has been incorporated into the SA/SEA process by wider consideration of the health topic in SEA. Close correlation will be sought between the monitoring requirements for the SA and the AMR.

The SA Scoping Process and this SA Scoping Report

1.11 The SA Scoping process includes the following key aspects:

- Identifying other relevant plans, programmes and sustainability objectives
- Collecting relevant baseline information including social, economic and environmental information
- Identifying sustainability issues, problems and opportunities for the SA and the DPDs to address
- Developing the SA Framework consisting of the SA objectives and decision-aiding questions to be used for appraisal; suggesting indicators and targets to be used for monitoring progress of the DPDs during implementation
- Consulting on the scope of the SA

1.12 The scoping process will help to ensure that the key sustainability issues relevant to spatial and development control planning for the Winchester City Council area are included within the Sustainability Appraisal. This SA Report summarises the studies undertaken as part of Stage A of the SA process outlined above. It is presented as a summary to assist consultees by focusing on the key issues for comment.

SA/SEA Consultation

1.13 The aim of consultation at the Scoping stage is to ensure all the relevant sustainability issues have been identified and thus assist with further improvement of the SA Framework. The three designated bodies that must be consulted under the Strategic Environmental Assessment Directive are English Heritage, the Environment Agency, and Natural England. As we are undertaking a Sustainability Appraisal integrated with a Strategic Environmental Assessment, a wider range of stakeholders will also be consulted, and the SA Scoping Report will be made available on the Council’s website (www.winchester.gov.uk). The Report will be available for consultation for 5 weeks.

Considerations for Consultees

1.14 This Scoping Report presents a proposed SA Framework. The sustainability objectives for the Winchester area and the decision aiding questions in the Framework have been developed from government guidance on undertaking SA and SEA, the review of relevant plans and programmes, analysis of baseline information, the Strategic Sustainability Appraisal of the South East Plan, and the SA
technical workshops. This report also suggests potential indicators and targets that could assist with the future monitoring of the sustainability of the LDF documents when they are adopted. Consultees are invited to consider the following questions:

1. Are there any key policies, plans or programmes missing from the Review?
2. Are there any additional key sustainability problems, issues or opportunities relevant to spatial planning and the Winchester district area for which sustainability objectives should be developed?
3. Are there any other relevant decision-aiding questions that could help with the Sustainability Appraisal?
4. Is there any further information available that could be used to help measure whether sustainability objectives are being progressed?
5. Which targets and indicators are most useful for future measurement of progress towards each sustainability objective?

The consultation period is 30th July to Friday 28th September. Please send responses to:

Strategic Planning, Winchester City Council, City Offices, Colebrook Street, Winchester SO23 9LJ
1.0 Review of Relevant Plans and Programmes

Introduction

2.1 In order to establish a clear scope for the SA and the LDF, it is necessary to review and develop an understanding of the wider range of policies, plans and strategies that are relevant to spatial and development control planning. This review seeks to identify key objectives and implications that the SA and the DPDs should be taking into account.

Method

2.2 A list of plans and programmes (PPs) from international to local levels and relevant to the SA of the LDF was compiled, including the PP Review for the Strategic Sustainability Appraisal undertaken of the South East Plan to ensure compatibility. Information obtained for each PP included the following:

- title, date, publishing organisation
- outline summary
- objectives or requirements relevant to the SA and LDF for Winchester district
- targets and indicators

Consideration was given to any key constraints, opportunities, challenges or synergies to help identify potential implications for the SA and the SA processes. Documents and information was categorised into categories for easier reference and access. The PP Review is detailed in Appendix I (available separately).

Key Issues and Opportunities

2.3 Key issues identified from the PP Review may be summarised as follows:

- adaptation, to, and management of, predicted effects of climate change
- accommodating predicted growth, including provision of affordable housing to meet local needs
- creating safer communities, including reducing anti-social behaviour and fear of crime
- radical action to reduce dependency on high levels of car usage and need to travel
- facilities accessible to all, including recognising the relationships between health, employment, education and good quality housing
- establishing a secure and enjoyable evening economy
- recognising the role of tourism in the local economy
- high standards of design; sustainable construction and occupation for built environment
- high value of cultural heritage in widest sense: built, environmental, social
Using the PP Review in the SA

2.4 The findings of this review of relevant plans and programmes has informed the identification of issues and opportunities for sustainability as discussed further in Section 5, and the development of the SA Framework, discussed in more detail in Section 6 of this report. The PP Review is a living document and will be updated when required; it will be used as part of the evidence base during the appraisal process.
3.0 Baseline Characterisation

Introduction

3.1 Collection and review of baseline information is fundamental to the SA process to provide a background and evidence base for identifying sustainability issues, problems and opportunities in the Winchester district area. This is a requirement under the SEA Directive. In order to make judgements during appraisal about how the content of the LDF will assist or hinder sustainable development, it is essential that the social, economic and environmental circumstances are understood, both for the present day, and how they may evolve in the future. It is intended that only relevant and sufficient data is collected on the present and future state of the District to allow adequate predictions of the likely effects of the Local Development Framework.

3.2 Government SA guidance suggests a practical approach to baseline data collection recognising that only enough relevant information is needed for the SA and that some information may not yet be available. Data gaps should be reported to identify uncertainties and risks in the appraisal. As this is an iterative process new information may be added as it becomes available.

Methodology

3.3 Government guidance advises that enough information should be gathered to answer the following questions:

- How good or bad is the current situation? Do trends show that it is getting better or worse?
- How far is the current situation from any established thresholds or targets?
- Are particularly sensitive or important elements of the receiving environment affected, e.g. vulnerable social groups, non-renewable resources, endangered species, rare habitats?
- Are the problems reversible or irreversible, permanent or temporary?
- How difficult would it be to offset or remedy any damage?
- Have there been significant cumulative or synergistic effects over time? Are there expected to be such effects in the future?

Summary Baseline

3.4 The baseline information collected and reviewed is detailed in Appendix II (available separately). This information has been compiled in a table in which information specific to the Winchester area has been presented alongside relevant data against which to compare the District. This comparative data includes county level data as well as national and regional data where available and enables the assessor to judge the context and significance of the local level data. Targets
and trends have been identified where possible and issues summarised on a topic basis. The data has been organised by topics for easier reference and to demonstrate compliance with the SEA directive. Key characteristics of the Winchester District apparent from the baseline information based on comparison with other areas are summarised as follows:

3.5 Population: In 2001 Winchester had a population of 107,222, an increase of 11.2% from 1991. In comparison Hampshire’s population grew by 7% during the same period. The area is predominantly rural with 65% (69,694) of the population living in the rural area and the remaining 35% (37,528) living within the City area. By 2026 the predicted total population is expected to grow to about 132,000, an increase of 19% on 2001. Winchester is currently Hampshire’s least densely populated district at 1.62 persons/hectare and can boast to be amongst the top 20 most affluent districts in England. However there are major contrasts in that the ward of St. John & All Saints is 4237th out of 8414 in the most deprived wards in the UK and there is some evidence of rural deprivation in outlying areas of the district. The mean population age is 40 with low numbers of school children; with lower mortality rates overall, it is an ageing population. White Christians are the dominant ethnic and religious group although the population has become more culturally diverse in recent years.

3.6 Health: Winchester’s general health is noticeably better than national and regional averages as highlighted by the low Standardised Mortality Rate (SMR). In line with this there are fewer households with one or more persons with a limiting long term illness.

3.7 Employment: Winchester has a buoyant economy based on the service sector and experiences higher than average fulltime employment (41.55%) and significantly lower than average (1.61%) economically active unemployment levels. There is an educated and skilled workforce working in professional roles that amount to over 30% of the population. Winchester is also maintaining employment in agriculture at higher levels than the rest of the country. Winchester is aiming to increase the value of tourism activity to the local economy, including the rural areas as well as the city.

3.8 There are a significantly lower number of households with no adults in employment; 1.89% compared to a national average of 4.83%. There is also a decline in the proportion of households with young children. However Winchester district has a well educated population with 30.16% being qualified to professional status compared to 19.9% nationally. Generally the area scores well in the Index of Multiple Deprivation with scores consistently in the 300s (where 1 is the most deprived and 354 the least deprived).

3.9 Housing: Average house prices are significantly higher in Winchester when compared with the South East. Between 2006 and 2026 10,439 dwellings are to be built in the Winchester area to meet the predicted housing need. The Council has a policy that a percentage of these will
be affordable housing for rent and/or shared ownership to meet the housing needs of those whose needs are not met by the market.

3.10 Transport: Between 1950 and 1995 car ownership in the UK increased from 2 million vehicles to 21.4 million and it is predicted to further increase by 20% by 2015. More ownership equals more use and traffic is predicted to increase in Hampshire by 2% on the motorways and 1% on local roads in the next 10 years. The Hampshire Transport Plan has identified local peak hour congestion in Winchester that will only be exacerbated by an increase in car numbers from the level of development proposed by the South East Plan. Particularly noticeable in Winchester’s more rural areas is the accessibility problems to local and sub regional facilities worsened by poor transport infrastructure.

3.11 The data show fewer households with no or one cars compared to national and regional figures but those households with two, three or more are substantially higher in comparison. This is consistent with the affluence of the population within the region and logically lends weight to the data showing car and van travel as the most used mode of transport. The data concerned with distance travelled to work indicates high numbers travelling less than 2km so within the city centre area or close to where the bulk of local business are located. As a commuter hub the figures show numbers of people travelling 10-30km and 40-60kms fairly high indicative of the corresponding distance to Southampton and Portsmouth. 6.9% of the population travel 60km plus, relating to the distance to London (109km) and emphasising the importance of location in respect to travel.

3.12 Landscape & Townscape: Winchester has both a rich built heritage and landscape setting. 40% of Winchester City Council area is part of the East Hampshire AONB and the proposed South Downs National Park.

3.13 Cultural Heritage: The District has a rich archaeological resource including remains from prehistory to the military history of the last century and has an extensive number of listed buildings. The City Council has designated 37 Conservation Areas in the District to date and has 109 Scheduled Ancient Monuments.

3.14 Biodiversity: The District is rich in habitat and biodiversity with designated Special Areas for Conservation, Special Protection Areas and Ramsar Sites. There are 17 Sites of Special Scientific Interest of which 9 are in favourable condition but the others are unfavourable and vary from recovering to declining. The District has 2 nationally designated nature reserves and 10 local nature reserves. Biodiversity Action Plans are in place for both habitats and species.

3.15 Water: Water supply in Hampshire is usually of high quality and resources depend on the groundwater stored in the chalk aquifers of the Hampshire Downs. Hampshire has no surface water storage reservoirs. There has been an overall improvement in river water quality in the county since 1990, but the River Itchen has had an increase in nutrient levels from sewage works (mainly phosphate) and farmland run-off (mainly nitrate) due to increased concentrations as a result of
population growth and agricultural intensification. Poorer river water quality is also associated with diffuse pollution from the large number of private domestic sewage soakaways and septic tanks. In the River Test and Itchen Catchment Area there are over 3,000 properties at risk of flooding.

3.16 Air Quality: Winchester City has one Air Quality Management Area which is improving. There have been no days when air pollution has been reported as moderate or higher. Nitrogen Dioxide levels are similar to 2004, meeting 24 hour mean objective but not complying with yearly mean objective. Previous studies show road traffic to be the main emission source of nitrogen dioxide.

3.17 Climate Change: Limited district wide data on carbon emissions is now available for the Winchester district. The South East has the greatest volume of carbon dioxide emissions in the UK and overall the country has seen a rise in emissions of 12.4% since 1990. Total carbon dioxide emissions in 2006 for the South East were approximately 71 million tonnes. Energy from renewable sources account for only 0.65% of total current generating capacity in the region compared to the UK national average figure of 2.5%. Hampshire’s sub-regional targets by 2010 is to generate at least 115MW and by 2016 at least 122MW. Hampshire, alongside the Isle of Wight, Kent, Thames Valley and Surrey, has the greatest potential in the South East for onshore wind development and installation of photovoltaics.

3.18 Soil & Minerals: The district has three major soil groups; - shallow lime-rich soils over chalk, freely draining lime-rich loamy soils and freely draining acid loamy soils. The district maintains an agricultural economy and there are 777 agricultural holdings. The South East Plan requires that Hampshire should plan to maintain a landbank of at least seven years of permissions for land-won sand and gravel and a supply rate of 2.63 million tonnes a year until 2016.

3.19 Waste: Winchester has experienced an increase in household waste arisings and recycling rates are now gradually improving. Substantial improvements in recycling rates will be required to reach the 2005/6 statutory recycling target. There is a need to increase waste handling capacities in Winchester which may be addressed by Project Integra that seeks to minimise the amount of waste needing landfill to a minimum practical level by 2020. The Project Integra business plan also sets an overall target of 50% recycling for municipal waste by 2010 and an individual target of 40% for Waste Collection Authorities.

Prediction of Trends

3.20 The SEA Directive requires identification of “the relevant aspects of the current state of the environment and likely evolution thereof without implementation of the plan or programme”. Prediction of future trends can be highly uncertain, but key trends identified from the baseline information, and therefore potential sustainability issues, are as follows:

- Higher aging population
- Increase in population
- Rising house prices
- Very high car use and dependency with associated emissions and poor adaptation/management for climate change predicted effects
- Low use of renewables and relatively low levels of waste recycling when compared with neighbouring counties
- Threats to the water quality of the Statutorily protected River Itchen from increased nutrient levels

Using the Baseline in the SA

3.21 The findings of this review of available baseline information have contributed to the identification of issues and opportunities for sustainability and are discussed further in Section 5. As spatial plans, the DPDs will be limited in how they can address sustainability issues identified through the baseline studies. These baseline conditions will be used during the SA process to help with assessing predicted effects of emerging proposals for strategic options and policies.
4.0 Early Consultation: Scoping Workshop

Method

4.1 A workshop with Officers, Council Members and SA statutory consultees, was held in the Guildhall on 26 June 2007 to facilitate engagement at an early and informal stage of the SA process. An overview of the LDF and SA processes was presented and then participants worked in small groups to discuss the proposed SA Framework of objectives and decision-aiding questions.

4.2 The workshop aimed to encourage proactive engagement in the SA process and to ensure that the proposed SA Framework reflects locally important issues prior to wider consultation with this SA Scoping Report. SA objectives and decision-aiding questions were drafted from consideration of issues arising from the PP review and the baseline characterisation. Participants worked in small groups that included a range of interests and expertise and they were invited to comment on the following:

- relevance to sustainability for the Winchester area
- appropriateness for spatial and development control planning
- reflection of aspirations and characteristics of the area
- whether the SA objectives are distinctive enough and meaningful locally
- whether they will help the planning documents to deliver sustainable development and create sustainable communities

4.3 During the latter part of the workshop, participants were invited to comment on potential indicators and targets, including identifying organisations or groups that hold relevant information and could help with monitoring the sustainability of the DPDs during implementation.

Attendance

4.4 The SA Scoping Workshop was attended by representatives from various departments in Winchester City Council including:

- Strategic Planning
- Landscape
- Partnerships & Communication
- Local Strategic Partnership
- Community Planning
- Environment
- Sustainability
- Cultural Services
- Rural Towns Development
- Access & Infrastructure
- Development Control Planning

Together with Council Members and representatives from:

- Highways Agency
- Environment Agency
Summary Findings

4.5 The participants generated stimulating cross-sectoral debate on appraisal of sustainable development and what this means for spatial planning in the Winchester district. The groups analysed, discussed and suggested amendments to refine the SA Framework to make it better reflect local knowledge and experience. The SA Framework presented here in Section 6 has incorporated the suggestions from the workshop and thus reflects the local knowledge of the participants.
5.0 Key Sustainability Issues, Problems & Opportunities

Context & Method

5.1 Identification of key sustainability problems, objectives and issues is an iterative process that assists in identifying the relevant baseline information, developing the SA Framework and assisting in identifying the implications for the preparation of the LDF. It is a specific requirement of the SEA directive to consider the significant effects of plans and programmes on certain topics, including their interactions and any cumulative effects. SA also seeks to find any opportunities for enhancing sustainability rather than just mitigating any adverse effects predicted.

5.2 The Sustainable Community Strategy for Winchester City Council sets the vision and strategic direction for developing sustainable communities. The LDF is a key component in the delivery of the Sustainable Community Strategy and is able to promote sustainable development through its influence on spatial and development control planning: the LDF is the spatial expression of the Sustainable Community Strategy and is particularly important in helping with maintaining and creating the particular distinctive sense of places that characterise Winchester – the city and the rural areas.

5.3 The key sustainability problems, objectives and issues have been identified through the following:

- other sustainability work of the Council, including discussions with Members and Officers, preparation of a climate change plan, developing a sustainability strategy, and a corporate sustainability assessment method
- preliminary evidence gathering for the LDF, including discussions and workshops on issues and visioning for a sustainable Winchester district
- the topics to be addressed in Strategic Environmental Assessment (EU 2001/42/EC)
- review of other relevant Plans & Programmes relevant to Winchester
- analysis of currently available baseline information
- preliminary consultation with key stakeholders through the SA Scoping Workshop held on 26 June 2007

Summary Findings

5.4 The key strategic problems, objectives and issues for sustainability identified for Winchester City Council are summarised below. These are focused on the scope and areas of influence of the LDF, namely promotion of sustainable development through spatial and development control planning. Section 6 explains how these issues for sustainability and planning have been used to develop the SA
Framework that will be used as a tool to assess the emerging LDF documents and help make the plan making more sustainable.

5.5 **Climate Change & Energy**: This is a fundamental issue that is cross-cutting and needs to be considered at all stages of the spatial and development control processes. Limited district wide data on carbon emissions is now available for the Winchester district, however the South East of England has the greatest volume of carbon dioxide emissions in the UK. With its very high car usage and with the level of growth to be accommodated in the Winchester area over the next 20 years, the nature and location of development and its subsequent implications for car use and the need for travel will be a major consideration. Controlling and managing air quality and pollution is another consideration that is closely linked to transport planning and management.

5.6 Other ways in which the LDF can help with managing and adapting to climate change include:

- energy conservation and efficiencies through location/orientation (e.g. passive solar gain); design, construction and occupation of buildings; supporting live-work development
- encouraging the use of renewable energy (both macro and micro generation) - the region is low in energy from renewable sources and Hampshire has been identified as an area with high potential for onshore wind development and installation of photovoltaics. The LDF will need to ensure that the potential environmental effects of such proposals are carefully assessed.

5.7 **Affordable Housing**: Average house prices are significantly higher in Winchester when compared to the rest of the South East. This affects the ability of essential service workers to live and work in the area and creates unbalanced communities – there is a decline in the proportion of households with young children and generally a population that is ageing. The LDF will need to address the need for affordable housing (for rent and/or shared ownership) to meet the housing needs of those that are not met by the market; this will be another major consideration that will require a partnership approach to delivery. With the growth predicted, it is important that local interests are not compromised by regional aspirations.

5.8 **Local Employment**: Winchester already has a buoyant economy with higher than average in fulltime employment, mostly based on the service sector, the professional sector, and has employment in the agricultural sector at higher levels than the rest of the country. This will need to be maintained whilst helping to meet the aspirations for increasing the role of tourism in the local economy and encouraging a vibrant, safe evening economy. However, there is concern expressed about the proportion of commuting (both in and out of the district) and a need identified to provide more local jobs for local people. The LDF can help with location and type of employment but partnership working guided by the Community Strategy will be essential.
5.9 **Transport & Accessibility**: Car ownership and usage is substantially higher in the Winchester area than regional and national data. Whilst transport matters are dealt with strategically at the county level, the LDF does have a role in helping to reduce the need to travel, reduce car dependency, and increase accessibility; these matters will be major considerations for all stages of the LDF preparation.

5.10 The LDF can help by requiring that all new development has access to facilities and services by means other than the car. The LDF can also seek provision of better footpaths and cycle routes linking places within a strategic network for the whole district. Public transport accessibility needs improvement but the sphere of influence of the LDF is limited and this will require a partnership approach. The LDF will need to address equality of accessibility, including recognising the relationships between employment, health, education and good quality housing. Equality of accessibility will be a key factor in the creation of safer communities that reduce anti-social behaviour and fear of crime.

5.11 **High Standards of Design & Timely Provision of Infrastructure**: Winchester has a high cultural value in its widest sense, including the built and natural environment, and its communities with their social heritage. Accordingly, Winchester district will expect highest quality and standards of design, sustainable construction and occupation for the built environment to help ensure that the distinctive character (both city and rural areas) of the district is maintained and enhanced. The LDF can help with this by requiring development proposals to meet certain standards. Facilities and infrastructure, such as cycle routes, footpaths, water supply, need to be in the right place and at the right time in order to serve new communities and ensure integration with existing communities.

5.12 **Environmental Quality**: this includes biodiversity, landscape, cultural and historical resources – all of which are rich resources in the Winchester area with local, regional, national and international designations. The LDF has an integral role in ensuring the sensitive and appropriate siting of land uses in order to protect and enhance the quality of the local environment.

5.13 Generally, the Winchester district area has good air and water quality. However, there are issues with poor river water quality associated with diffuse pollution from the high proportion of residential properties that are not on mains sewerage. Wastewater treatment facilities and sewerage networks will need to have sufficient capacity at the appropriate time to accommodate proposed development growth.

Using the SA to assist the LDF address the key Issues

5.14 The SA will assist the LDF in identifying and progressing the most sustainable options that could deal with these issues overall. Thus in considering the LDF strategy and policies, the consequences of certain course of action (such as the energy and materials involved in...
constructing or converting buildings) might be justified on the basis of other sustainability benefits (such as energy savings resulting from development in a particularly accessible location).

5.15 The LDF and the Sustainable Community Strategy will not be able to address every sustainability problem, objective and issue identified through the review of PPs, baseline analysis, and consultation. The key issues for sustainability outlined above are focussed within the remit of the LDF and the details of the SA Framework discussed in the next Section 6 are designed to reflect what the LDF can do about sustainability issues.
6.0 Proposed SA Methods

Appraisal Method

6.1 The SA Framework presented in Table 6.1 at the end of this section includes a set of objectives for sustainability and planning; these are different from the objectives in the LDF and the Community Strategy, although there will be some overlap. These are designed for assessing the progression towards sustainability of emerging options and policies for spatial and development planning.

6.2 Each SA objective is presented together with decision-aiding questions (or sub-objectives) that assist by clarifying the detail of the issues, improving objectivity, ensuring that the appraisal is relevant to land use planning, and making the appraisal more locally specific. It is important that the Framework reflects local circumstances that can be actually influenced by land use planning. These decision-aiding questions also help to avoid duplication or conflict when so many factors are inter-related.

6.3 Sustainable Development recognises that social, economic and environmental factors are interconnected, and SA aims to take an integrated approach. Accordingly, the proposed SA Framework does not categorise objectives into Social, Economic and Environmental. However, it is necessary to demonstrate compliance with the SEA directive requirement to assess certain environmental topics. Therefore, for each SA objective the correlating and relevant SEA topics have been referenced for easier auditing.

6.4 The SA Framework provides a way in which sustainability effects can be described, analysed and compared. The SA methodology involves considering the content of the Development Plan Documents against each SA objective. Comments about whether the content (options, policies and proposed actions) of the DPDs are likely to progress or conflict with each SA objective will be recorded in tables. Where significant conflicts are identified, possible measures to offset adverse effects will be considered, with recommendations to amend the content accordingly. Professional judgement is used to make the assessment supported by baseline data where it is available.

6.5 The assessment of each element of the DPDs is graded according to six categories that are presented in the following key. The significance of effects is judged according to their own methods of study and standards. For example, a predicted effect on nature conservation takes into account the relative potential effects on areas with international through to local value and considers aspirations recorded in relevant plans and strategies such as the Biodiversity Action Plan. The appraisal describes the predicted effect, where possible, and considers short/long term; indirect/direct; cumulative; positive and
negative. The method also allows for reporting of neutrality or uncertainty – this may be due to lack of information upon which to make judgements.

**Table 6.1: SA Key**

<table>
<thead>
<tr>
<th>R</th>
<th>Absolute sustainability constraints to development</th>
</tr>
</thead>
<tbody>
<tr>
<td>O</td>
<td>Problematical and improbable because of known sustainability issues</td>
</tr>
<tr>
<td>Y</td>
<td>Potential sustainability issues: mitigation and/or negotiation possible</td>
</tr>
<tr>
<td>LG</td>
<td>No sustainability constraints and development acceptable</td>
</tr>
<tr>
<td>DG</td>
<td>Development actively encouraged as it would resolve an existing sustainability problem</td>
</tr>
<tr>
<td>?</td>
<td>Uncertain or Unknown Effects</td>
</tr>
<tr>
<td>Blue</td>
<td>Neutral effect</td>
</tr>
</tbody>
</table>

6.6 The appraisal of each option or policy is recorded in a table and includes comments where useful, for example, an uncertainty may benefit from seeking further information, or the judgement made needs explanation. Where significant conflicts are identified, possible measures to offset adverse effects will be considered with recommendations to amend the content accordingly. For example, this may be a suggestion for a different option, additional mitigation, or it may be suggestions for rewording policy. The appraisal also considers any opportunities to enhance sustainability rather than just mitigating adverse effects. The SA Framework and this approach enable a systematic, robust and transparent appraisal.

**Monitoring**

6.7 Proposals for monitoring the significant effects of implementing the DPDs must be considered early in the SA process and a Monitoring Strategy is prepared for publication at a later stage when the final SA Report is published. Government advises a pragmatic approach and encourages synergy between the monitoring requirements for the SA, the LDF and the Annual Monitoring Report (AMR) (a requirement of the Planning Act, 2004). Indicators and targets need to be relevant, strategic and manageable.

6.8 A number of indicators and targets are suggested for the SA objectives. For some of the indicators and targets, the limitations of the baseline data (such as being at the wrong geographical level or held over insufficient time to show a trend) may limit the extent to which indicators and targets can be used in predicting and measuring progress in the shorter term.
6.9 This SA Scoping process seeks to identify holders of information and those that can help with monitoring. The SA Reports to be published with the Preferred Options DPDs will discuss this situation further, and include suggestions for actions to collect missing data.
Table 6.1: Proposed SA Framework

<table>
<thead>
<tr>
<th>SA OBJECTIVE</th>
<th>DECISION-AIDING QUESTIONS</th>
<th>Possible Indicators</th>
</tr>
</thead>
<tbody>
<tr>
<td>Building Communities</td>
<td>Does the option/policy:</td>
<td>Accessibility: % of households that can reach local facilities by foot or public transport within 15 mins</td>
</tr>
<tr>
<td>SEA topics: Population</td>
<td>▪ Help provide facilities for social interaction</td>
<td></td>
</tr>
<tr>
<td></td>
<td>▪ Promote diverse communities and meet a range of housing needs</td>
<td></td>
</tr>
<tr>
<td></td>
<td>▪ Ensure inclusion of all sections of the community</td>
<td></td>
</tr>
<tr>
<td></td>
<td>▪ Ensure equality of access to services</td>
<td></td>
</tr>
<tr>
<td></td>
<td>▪ Integrate new and existing communities</td>
<td></td>
</tr>
<tr>
<td></td>
<td>▪ Encourage community cohesion and a sense of community ownership</td>
<td></td>
</tr>
<tr>
<td></td>
<td>▪ Reduce social exclusion of disadvantaged groups</td>
<td></td>
</tr>
<tr>
<td></td>
<td>▪ Meet the needs of an ageing population</td>
<td></td>
</tr>
<tr>
<td>Infrastructure</td>
<td>Does the option/policy:</td>
<td>Proportion of population % with access to high amenity space</td>
</tr>
<tr>
<td>SEA topics: Material Assets</td>
<td>▪ Support the provision of community facilities, for example cultural, health and social facilities.</td>
<td>Provision (kms) of cycle routes</td>
</tr>
<tr>
<td></td>
<td>▪ Encourage the enhancement of green infrastructure (strategic network of protected sites, nature reserves, greenspaces, and greenway linkages)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>▪ Ensure the delivery of infrastructure that meets the needs of new and existing development</td>
<td></td>
</tr>
<tr>
<td></td>
<td>▪ Ensure appropriate timing and phasing</td>
<td></td>
</tr>
<tr>
<td>Housing</td>
<td>Does the option/policy:</td>
<td></td>
</tr>
<tr>
<td>SEA topics: Population</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### To provide good quality housing for all
- Deliver affordable and sustainable housing both in urban and rural areas, in keeping with local character
- Support the sympathetic accommodation of housing growth in sustainable locations
- Balance housing and employment land delivery with community facilities and environmental capacity
- Provide for an appropriate mix of dwelling size, type, density and phasing to meet local needs
- Provide for a range of housing to meet the needs of specific groups, (e.g. the elderly, disabled, young) and adaptable housing that meets the needs of people in different life stages

### Affordable housing: % of housing stock available/ number of affordable housing unit completions per year

### Economy and Employment

#### SEA topics: Population

**To maintain the buoyant economy and develop greater diversity that meets local needs**

Does the option/policy:
- Provide a diverse range of jobs that meet the needs of local people
- Ensure jobs are located in sustainable locations
- Support the rural economy
- Reduce both out commuting and in commuting
- Help maintain Winchester as a major focus of learning and education
- Assist in the retention of young people and graduates
- Recognise the role of tourism in the local economy
- Support retail diversity across the district
- Support live work units & working from home
- Balance suitable employment with housing growth
- Encourage environmentally and socially responsible employment and help to create local markets for local goods/services
- Aim towards establishing a low carbon economy for Winchester

### Number of new business start-ups

### Business % with stated sustainable development goals
### Transport

**SEA topics:** Air, Climatic Factors, Population, Material Assets

<table>
<thead>
<tr>
<th>Does the option/policy:</th>
<th>Share % of passenger travel on public transport</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Support delivery of quality public transport</td>
<td></td>
</tr>
<tr>
<td>• Enable the enhancement of a District-wide network of footpaths and cycle links between settlements, homes and work and community facilities</td>
<td></td>
</tr>
<tr>
<td>• Support the need to reduce travel, especially during peak times</td>
<td></td>
</tr>
<tr>
<td>• Locate new development to reduce the need to travel</td>
<td></td>
</tr>
<tr>
<td>• Help create an integrated sustainable transport system, for example through providing for safe storage for cycles, respect for users of shared road space, green lane linkages</td>
<td></td>
</tr>
<tr>
<td>• Adopt maximum parking standards</td>
<td></td>
</tr>
</tbody>
</table>

### Health

**SEA topics:** Human Health

<table>
<thead>
<tr>
<th>Does the option/policy:</th>
<th>Recorded crime</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Protect and increase the provision of and accessibility to community, cultural and recreational facilities</td>
<td></td>
</tr>
<tr>
<td>• Require design that ensures safe, attractive places and engenders a sense of place</td>
<td></td>
</tr>
<tr>
<td>• Increase accessibility to health facilities Encourage multi-functional use of facilities</td>
<td></td>
</tr>
</tbody>
</table>

### Water

**SEA topics:** Water, Climatic Factors, Biodiversity, Health

<table>
<thead>
<tr>
<th>Does the option/policy:</th>
<th>Water consumption per household</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Require the use of water efficiency measures</td>
<td></td>
</tr>
<tr>
<td>• Minimise risk of flooding and promote adaptation measures</td>
<td></td>
</tr>
<tr>
<td>• Promote the adoption and use of sustainable drainage systems</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Development % with sustainable drainage</td>
</tr>
<tr>
<td>8 Waste</td>
<td>SEA topics: Material Assets</td>
</tr>
<tr>
<td>---------</td>
<td>-----------------------------</td>
</tr>
<tr>
<td><strong>To ensure sustainable waste management</strong></td>
<td>Does the option/policy:</td>
</tr>
<tr>
<td></td>
<td>• Help reduce waste and facilitate recycling in construction and operation</td>
</tr>
<tr>
<td></td>
<td>• Encourage composting</td>
</tr>
<tr>
<td></td>
<td>• Encourage development that is self-sufficient in waste management</td>
</tr>
<tr>
<td></td>
<td>• Support the recovery of energy from waste</td>
</tr>
<tr>
<td></td>
<td>Waste % recycled or composted</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>9 Climate Change</th>
<th>SEA topics: Climatic Factors, Air, Water</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>To address the causes of climate change and to mitigate and adapt in line with Winchester’s Climate Change Strategy</strong></td>
<td>Promote renewable energy generation</td>
</tr>
<tr>
<td></td>
<td>Help reduce carbon and other greenhouse gas emissions</td>
</tr>
<tr>
<td></td>
<td>Ensure adaptation planning that maximises opportunities and minimises the costs of climate change.</td>
</tr>
<tr>
<td></td>
<td>Promote community involvement, understanding and action on climate change</td>
</tr>
<tr>
<td></td>
<td>New developments % with adaptation measures as standard</td>
</tr>
<tr>
<td></td>
<td>Renewable energy % sourced in new developments</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>10 Sustainable Construction</th>
<th>SEA topics: Air, Water, Climatic Factors, Material assets</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>To promote the sustainable design and construction of buildings and places</strong></td>
<td>Does the option/policy:</td>
</tr>
<tr>
<td></td>
<td>• Ensure the incorporation of energy efficiency measures and renewables in new development aiming for zero carbon dwellings and workplaces</td>
</tr>
<tr>
<td></td>
<td>• Seek higher density in new development in appropriate areas</td>
</tr>
<tr>
<td></td>
<td>% of new development meeting BREEAM and/or Code for Sustainable Homes Level?</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>---</td>
</tr>
</tbody>
</table>
| **Biodiversity** | **To conserve and enhance biodiversity** | Does the option/policy:  
- Protect and enhance designated and locally valued habitats and species  
- Prevent and reverse habitat fragmentation, where possible  
- Promote understanding of and access to biodiversity  
- Provide opportunities for provision and enhancement of greenspace | BAP priority species and habitat % change |
| **Heritage** | **To protect and enhance built, natural and cultural heritage** | Does the option/policy:  
- Support, develop and enhance access to locally-based cultural resources and activities  
- Protect and improve the historic and archaeological environment, where appropriate  
- Help accommodate new development without detriment to the existing built and natural heritage | Buildings at risk: % absolute reduction year on year |
| **Landscape & Soils** | **To protect the character and quality of the landscape of Winchester District** |  
- Minimise adverse impact on the landscape setting of the city, towns and rural settlements  
- Prioritise the use of previously developed land to minimise greenfield development  
- Ensure protection and enhancement of the AONB, National Trust sites  
- Ensure protection of tranquil environments  
- Minimise noise and traffic volume at sensitive sites | Tranquillity: traffic volume at sensitive sites |
<table>
<thead>
<tr>
<th></th>
<th>Park, and local landscape designations</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>14</td>
<td>Built Environment&lt;br&gt;SEA topics: Cultural heritage, Population, Material Assets</td>
<td></td>
</tr>
</tbody>
</table>
|   | To secure high standards of design | Does the option/policy:  
|   |   |   - Promote recognition of local distinctiveness and a sense of place in style, materials and scale  
|   |   |   - Make best use of existing buildings through reuse and conversion, and promote innovation in design  
|   |   |   - Promote integration of new development with existing context/design  
|   |   |   - Recognise the role of the community in securing good design e.g. Village design statements, community planning |   |
|   |   | Design quality, public perception, approvals ratings |   |
| 15 | Pollution<br>SEA topics: Air, Climatic Factors, Human Health, Soils, Water |   |
|   | Minimise local and global sources of pollution | Does the option/policy:  
|   |   |   - Improve air quality, e.g. through transport management and reduction of employment related emissions  
|   |   |   - Reduce and manage noise pollution  
|   |   |   - Reduce and manage the impact of light pollution  
|   |   |   - Ensure there is no pollution of water sources  
|   |   |   - Ensure there is no pollution of the soil |   |
|   |   | River water quality change |   |
7.0 Statutory Consultation and Next Steps

7.1 This document sets out the baseline character and condition of the Winchester City Council area; plans and policies that influence the SA and the LDF have also been reviewed. This scoping study has identified current sustainability issues, problems and opportunities facing the District. The proposed SA Framework for appraising the Development Plan Documents is presented.

7.2 Early consultation has been carried out with key stakeholders and their contribution has shaped the identification of issues and the development of the SA Framework so far. This SA Scoping Report is now presented for wide public consultation as part of the statutory requirement at this stage. Copies have been sent to the statutory consultees and placed on the Council’s website www.winchester.gov.uk together with notification to interested parties made through e-bulletins.

7.3 Comments received on this document will be taken into account in preparing the finalised SA Framework that will be used to appraise the emerging DPDs.

7.4 The results of the sustainability appraisals will be set out in SA Reports and published alongside each LDF document at the Issues & Options, Preferred Options, and Submission stages. These SA Reports will record the detail of the appraisal and the difference that the SA process has made to the LDF process. The Issues & Options for the LDF Core Strategy is programmed for appraisal and publication during the late summer and autumn 2007.
ABBREVIATIONS & GLOSSARY

SA  Sustainability Appraisal: a tool for helping to make plan making more sustainable. SA of spatial plans is a mandatory requirement of the Planning Act, 2004.

SEA  Strategic Environmental Assessment: sets the strategic context for project level Environmental Impact Assessment (EIA) that is a requirement for certain development proposals.

SEA requires that the predicted significant effects of plans and programmes are assessed - any adverse effects should be avoided or mitigated. The requirement for SEA derives from the EU directive that seeks to promote sustainable development and provide for a high level of protection of the environment.

SA/SEA  In the UK, SEA is a statutory requirement for spatial plans; in England & Wales it is a requirement (see PPS12) to carry out an integrated assessment with the requirements for SEA subsumed within the SA and the socio-economic factors assessed to the same level of detail as required by the SEA directive.

HRA/AA  Habitats Regulation/Appropriate Assessment: a statutory requirement arising from the EU Habitats directive to afford a high level of protection for European protected sites - Ramsar, Special Protection Areas (SPAs) and Special Areas of Conservation (SACs). A particular feature of this legislation is the requirement to consider ‘in-combination’ effects of development proposals. The requirement for AA will be scoped at the same time as the SA Scoping for the LDF.

SCS  Sustainable Community Strategy: sets out a vision for the future of the Winchester district over 20 years - prepared by the Local Strategic Partnership (LSP) representing all sectors of the Winchester District area.

LDF  Local Development Framework: sets out the Council’s spatial planning vision, strategy and policies for delivering the SCS Vision. This planning framework may comprise a number of DPDs and SPDs

CS  Core Strategy: sets out the spatial planning vision, objectives and preferred strategic options

DPD  Development Plan Document

SPD  Supplementary Planning Document
# Winchester City Council

**LOCAL DEVELOPMENT FRAMEWORK: SUSTAINABILITY APPRAISAL**

## SA SCOPING REPORT

<table>
<thead>
<tr>
<th>date:</th>
<th>June 2007</th>
</tr>
</thead>
<tbody>
<tr>
<td>prepared for:</td>
<td>Winchester City Council</td>
</tr>
</tbody>
</table>
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Liz Payne  
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Lara Turpin |
| quality assurance: | Ruth Thomas |

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