

LITTLETON AND HARESTOCK PARISH COUNCIL (LHPC)

Examination of the Winchester District Local Plan 2020-2040

**Matter 6 Winchester Site Allocation: Policy W2
Sir John Moore Barracks**

**Submission of Littleton & Harestock Parish Council
Representation Ref no ANON-AQTS-3BEW-A**

Matter 6: Winchester Site allocations

Issue: Whether the proposed housing site allocations in Winchester would be justified, effective and consistent with national policy?

Introduction

1. This submission sets out the response of Littleton & Harestock Parish Council (LHPC) in respect of Matter 6 and, in particular, Policy W2 Sir John Moore Barracks (SJMB). It should be read alongside its submissions on Matter 12 Policy D5 and Matter 14 Policy NE7.
2. The Parish Council does not oppose the redevelopment of the SJMB site for 750 dwellings. However, it does have serious concerns regarding the impact of the scale of development proposed by Winchester City Council (WCC) on the character and natural environment of the area, i.e. the “working assumption” of 900 dwellings stated in paragraph 12.15 in the supporting text to Policy W2. In particular, it is concerned about the impact on the Winchester–Littleton Settlement Gap, Policy NE7 and the Northern Fields candidate SINC.
3. The Parish Council has been consistent in its objections to the scale of development proposed throughout the preparation of the plan based on its impact on the gap and ecology at both the Regulation 18 (November 2022) and Regulation 19 (August 2024) stages of the plan’s preparation. The Parish Council prepared a planning brief for the site in support of its representations on the Local Plan, available at <https://lhpc.org.uk/wp-content/uploads/2024/08/LHPC-Planning-Brief-SJMB-v5-10Jul24.pdf>.¹ This was circulated to Winchester City Councillors and its Planning Department, with a courtesy copy also sent to the Defense Infrastructure Organisation (DIO). Consistent with this response on the emerging local plan, the Parish Council has continued to participate in the DIO’s engagement process for the preparation of its concept masterplan.

Response to ED13, Matter 6, Policy W2, Question 1

4. Policy W2 is a key policy of the local plan. In its current form, it, along with the supporting text, does not provide clear, coherent guidance in terms of what is expected by the local planning authority. The criteria highlighted in Question 1 are an example of this. The criteria xiv and xvi could be replaced by one which addresses the site-specific heritage issues. Policies HE2-HE5 provide the overarching policy framework. Criteria iv and xvii appear to be covering the same issue.
5. The Parish Council finds the approach set out in Policy W2 somewhat perplexing in that it is specific on some issues, e.g. the retention of the chapel, but is silent on key matters such as the settlement gap and strategic landscaping.

¹ LHPC prepared a planning brief in 2023 to outline its preferences and recommendations in relation to the development of the SJMB site. It took account of the Littleton Village Design Statement in setting out principles for the scale and location of the development, the existence of the settlement gap, integration within the existing community, management of the effect on the transport network and the impact on ecology. The planning brief was updated in 2024 to take account of the candidate SINC in the Northern Fields and was circulated to all Winchester City Councillors, the Planning Department and DIO.

6. A key function of Development Plan Documents is to provide guidance regarding how a local planning authority will consider proposals for development. This is important for both the promoters of development and the public. Paragraph 16 of the NPPF 2023 advises that plans should:
‘d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals’
7. In respect of key land use issues, Policy W2 has little detailed guidance on how the site should be developed.
8. The policies map is also extremely unhelpful in that the whole site is allocated for development despite including land designated in the Winchester-Littleton settlement gap (Policy NE7), which covers a significant part of the site.
9. The lack of detail in the policy means that it is not clear what the response of WCC would be to a planning application.

Response to ED13, Matter 6, Policy W2, Question 2

10. It is the Parish Council’s understanding that the supporting text to a policy should not introduce additional requirements but should assist the understanding of the policy and how it would be applied. In its current form, Policy W2 and the supporting text do not provide the appropriate policy framework to guide the development of the SJMB site.
11. Policy W2 sets the scale of development and is presented as a range of 750-1000 dwellings. However, in the supporting text at paragraph 12.15, page 314 of SD01, a working assumption of 900 dwellings is referenced. It is this figure which is included in the land supply calculations (see the table in paragraph 12.4, page 307). The Parish Council can find no evidence for alighting on the number of 900 dwellings, but it is significant as it appears to be the figure which the masterplan has sought to meet.

Response to ED13, Matter 6, Policy W2, Question 3

12. The Parish Council has made a submission in respect of Policy D5 Masterplans. This submission focuses on Policy W2.
13. The Parish Council has questioned the masterplan approach as it is concerned that it has little status in planning terms. That concern is supported by the case of the SJMB masterplan (ref ED12). WCC have stated that it has no formal planning status. ‘The concept masterplan as prepared will be a material consideration for development management purposes’ (see para 3.1 report to Cabinet 12th February 2025).
14. WCC have consistently advised the Parish Council that it is the masterplan that would provide the detail as to how the site would be developed. The endorsed masterplan does not provide that detail. The plan showing the disposition of land uses is illustrative only, with no clear boundaries defined on an OS base or dimensions of the strategic landscaping being relied upon

to screen the site. It does not provide a sufficiently detailed framework on which to base important planning decisions

15. The masterplan endorsed by WCC does not satisfy its own approved Master Planning Approach to Concept Masterplans, June 2023. In terms of Output, WCC requires advice and clarity on spatial parameters such as movement and access, land-use and green and blue infrastructure.
16. WCC's approach is a confusing one. It has proposed under Policy NE7 to include a significant part of the site for development within the Winchester-Littleton settlement gap. WCC has included a policy with a significant land use impact within the settlement gap and will rely on the masterplan to help define the settlement gap and a future review of the plan to address the anomaly.
17. The outcome of WCC's proposed approach (as applied to SJMB) is that it has agreed via the details of the masterplan those matters which should more properly be established through the local plan process. In simple terms, the cart has been put before the horse.

Response to ED13, Matter 6, Policy W2, Question 4

18. The Parish Council has no issue with the principle of vehicular access to the site from Andover Road. It is concerned about the cumulative impact of the development of the SJMB and the diversion of Andover Road on the road network through the parish, i.e. vehicles seeking to avoid the diversion. The Parish Council has also raised concerns in respect of the current Masterplan's proposal for two access points off Andover Road and an off-road cycleway, which will also have an impact on the landscape setting of the road which is a key approach into Winchester from the east.

Response to ED13, Matter 6, Policy W2, Question 5

19. The Parish Council have maintained a consistent position which supports the redevelopment of the site within the existing built-up area of the barracks subject to it respecting the environmental constraints and relationship with adjoining residential areas. However, it considers that WCC does not appear to have undertaken a sufficiently detailed assessment of the site to determine its capacity and are now relying on an externally prepared masterplan.
20. Policy W2 sets a range of 750-1000 dwellings, while paragraph 12.15, page 314 of SD01 refers to a working assumption of 900 dwellings. The Parish Council has not been able to establish the evidence base which justifies these figures. The site includes areas of land which should be considered as key constraints in the assessment of the site's capacity: the settlement gap, the existing designated SINC, the area of the candidate SINC and the strategic landscaping on the boundaries of the site.
21. The Development and Site Selection Topic Paper 2024 (ref SD10b and SD10c) provides a high-level assessment against objectives set out in the Sustainability Framework but it does not assess the impact of the range proposed in the policy. The site was also the subject of assessment as part of the Integrated Impact Assessment 2024 (ref SDO2a). Both assessments

consider landscape character sensitivity, visual sensitivity and landscape value. However, the range of 750-1000 dwellings itself has not been assessed.

22. WCC commissioned consultants LUC to review the boundaries of the existing settlement gaps. The Settlement Gap Review July 2024 (ref BNE29) reviewed seven of the nine existing settlement gaps, but the Winchester–Littleton gap was excluded. The reason given was that the masterplanning process would determine the extent of development and in turn inform any future review of the settlement gap (see page 3, paragraph 1.8 of the review). This is another example of the masterplan pre-empting the local plan.
23. The Regulation 19 plan proposes a gap and included the extent of it on the Policies Map. Paragraph 12.27, page 317 of SD01 refers simply to part of the site being located in the settlement gap. This is a weak assessment of the extent of the gap shown on the Policies Map which covers approximately a third of the site.
24. Given that Policy NE7 would only permit development which did not undermine the function of the gap and retain the separate identity of the settlement, it is difficult to reconcile the estimate of 900 dwellings and the proposed range of 750-1000 dwellings with the retention of the gap under the policy.
25. WCC's response to the Parish Council's representations to the Regulation 18 plan confirmed that it is the masterplan and the planning application process which will determine the boundary of the settlement gap in respect of the SJMB site, not this local plan.
26. The ecological importance of the site extends beyond the existing designated SINC. Following consideration of the survey data provided by the Defence Infrastructure Organisation (DIO) the recommendation, in October 2023, of the SINC Advisory Panel of the Hampshire Biodiversity Information Centre (HBIC) to WCC was that the Northern Fields should be designated as a SINC in the form of an extension to the existing Flowerdown SINC (see Appendix A). In the interim, the site would have the status of a candidate SINC. Given the extent of the proposed designation, it would have been reasonable to expect a review of the site's capacity. WCC had already acknowledged the importance of the Northern Fields in its EIA Scoping Opinion WCC dated 29.4.21, ref 21/00519/SCOPE, see extract below:

Habitats of Principal Importance

The hedgerows, woodland and the calcareous grassland within the Site are Habitats of Principal Importance for the conservation of biodiversity.

Woodland parcels should all have long term management plans

Grassland habitats with ecological value (especially the north fields, the patch of calcareous grassland) should be retained and enhanced where possible, with fringe – transitional habitats on the woodland edges

Ecological Connectivity

Ecological connectivity to the wider landscape needs to be considered and built in to the design of the proposals. For example, fragmented areas of woodland in the "north fields" area should be connected to similar habitats with ecological value. Pedestrian and cycle paths should act as green corridors and enable ecological connectivity. Public access in to more sensitive habitat areas should be restricted or avoided strategically.

Embracing the importance of the Northern Fields would be fully commensurate with WCC's Declaration of a Nature Emergency (BNE25). However, it is only in the report to Cabinet on the 12th of February 2025 that the Candidate SINC was acknowledged as a material consideration. The Parish Council considers the omission of this from Policy W2 a major weakness which only adds to a sense of confusion.

27. There does not appear to have been any assessment of the capacity of the site arising from retaining the areas of strategic landscaping identified on the boundaries of the site in The Development Strategy and Site Selection Background Papers 2024, Appendix 3 (ref SD10c). This identified the significant role that belts of vegetation on the boundaries of the site play in screening most existing residential properties from views of the site. The presence of extensive belts of vegetation on Harestock Road, Andover Road and Kennel Road (N.B. it should read Lane) result in the site being substantially hidden. Given the important role these belts play in the assessment of the site and the acceptability of development, it would be expected that Policy W2 would also identify them and require their retention. Such an approach would have an impact on the capacity of the site.
28. The masterplan endorsed by WCC after the submission of the local plan for examination appears to be the only detailed assessment of the capacity of the site in terms of number of dwellings. It is informative in that to deliver the 'working assumption' of 900 dwellings, it would require a high proportion of the proposed settlement gap within the site being developed and the loss of most of the candidate SINC.
29. The Parish Council, in support of its representations to the Regulation 18 plan, undertook its own assessment of the site, prepared a Planning Brief and submitted it to WCC in early 2023, and revised it in 2024 (see <https://lhpc.org.uk/wp-content/uploads/2024/08/LHPC-Planning-Brief-SJMB-v5-10Jul24.pdf>). It recognised that the extent of the settlement gap would need to be amended given the existing built development. The Parish Council planning brief shows a boundary set back from Kennel Lane, retains the existing Flowerdown SINC and includes the land in the candidate SINC. The remaining area which could be developed is approximately 30ha. This area is considered large enough to provide for 750 dwellings and a site for a park and ride scheme.

Response to ED13, Matter 6, Policy W2, Question 6

30. In preparing the local plan, WCC have presented no evidence to demonstrate that development of the SJMB site for 750-1000 dwellings can be achieved whilst retaining the open and undeveloped nature of the gap proposed under Policy NE7 and as shown on the Policies Map.

Response to ED13, Matter 6, Policy W2, Question 7

31. The Parish Council considers that there is little evidence that an informed balancing of the special qualities of the area and the efficient use of land has been undertaken.
32. Having regard to the use of the site, taking into account the proposed settlement gap, retention of the ecological interest of the site, the existing and proposed SINC, the strategic

landscape belts around the site, the Parish Council considers that delivering 750 dwellings would represent an efficient use of land.

Response to ED13, Matter 6, Policy W2, Question 8

33. In respect of the scale of housing proposed, the Parish Council's view is that it has not been justified for the reasons outlined in previous sections of this submission.
34. Regarding the park and ride facility, the only evidence submitted to the examination and relied upon by WCC is the Winchester Movement Strategy 2019 (ref STO1). The action plan included a project to increase the total number of park and ride spaces for Winchester from 1800 to 3000. In respect of the SJMB site, the Andover Road corridor was recognised as a location for potential sites, although no specific locations were identified.
35. Further work was undertaken regarding the projected demand for additional spaces in The Winchester Movement Strategy Feasibility Study July 2020, drafted in the early months of 2020. It reviewed the projected demand and recommended, in addition to the proposed site at Kings Barton, a further site on Andover Road in the vicinity of the SJMB site. The Winchester Movement Strategy Feasibility Studies, Phase 2 Summary Report, July 2021, is the most recent report on the park and ride proposals for the City. It identified two potential locations in the Andover Road corridor, one on the SJMB site and a second east of Andover Road at Three Maids Hill, further north.
36. The long-term case for a site in the Andover Road corridor was re-affirmed in the 2021 Study but was caveated, taking account of the impact of the pandemic:
- 'WCC will undertake an interim review of P&R once a "new normal" of travel patterns into Winchester have been established. This review will be integrated into economic recovery work and into work on the Winchester District Local Plan (ref section 2.7 page 18).
37. The Parish Council is unaware of a review being undertaken.
38. The Parish Council is not aware of the evidence that WCC relies upon in support of the allocation of land on the SJMB site for a park and ride scheme or for the number of spaces proposed. Policy W2 xix proposes a park and ride facility of approximately 850 spaces, stating, "The scale and location of the Park & Ride facility should be determined through the master planning process and transport assessment..." This suggests that there is some uncertainty regarding the actual number to be provided. If that is the case, providing a range consistent with the feasibility studies, i.e. 650-850 spaces, would have some merit.
39. However, the proposal for a park and ride site in Policy W2 could potentially have an adverse impact on the candidate SINC. The loss of an ecologically important area of land would need to be fully justified in terms of the need outweighing the harm. At the present time, the Parish Council considers that the case has not been made.

This concludes our submission.

Appendix A: Location of Candidate SINC in the Northern Fields

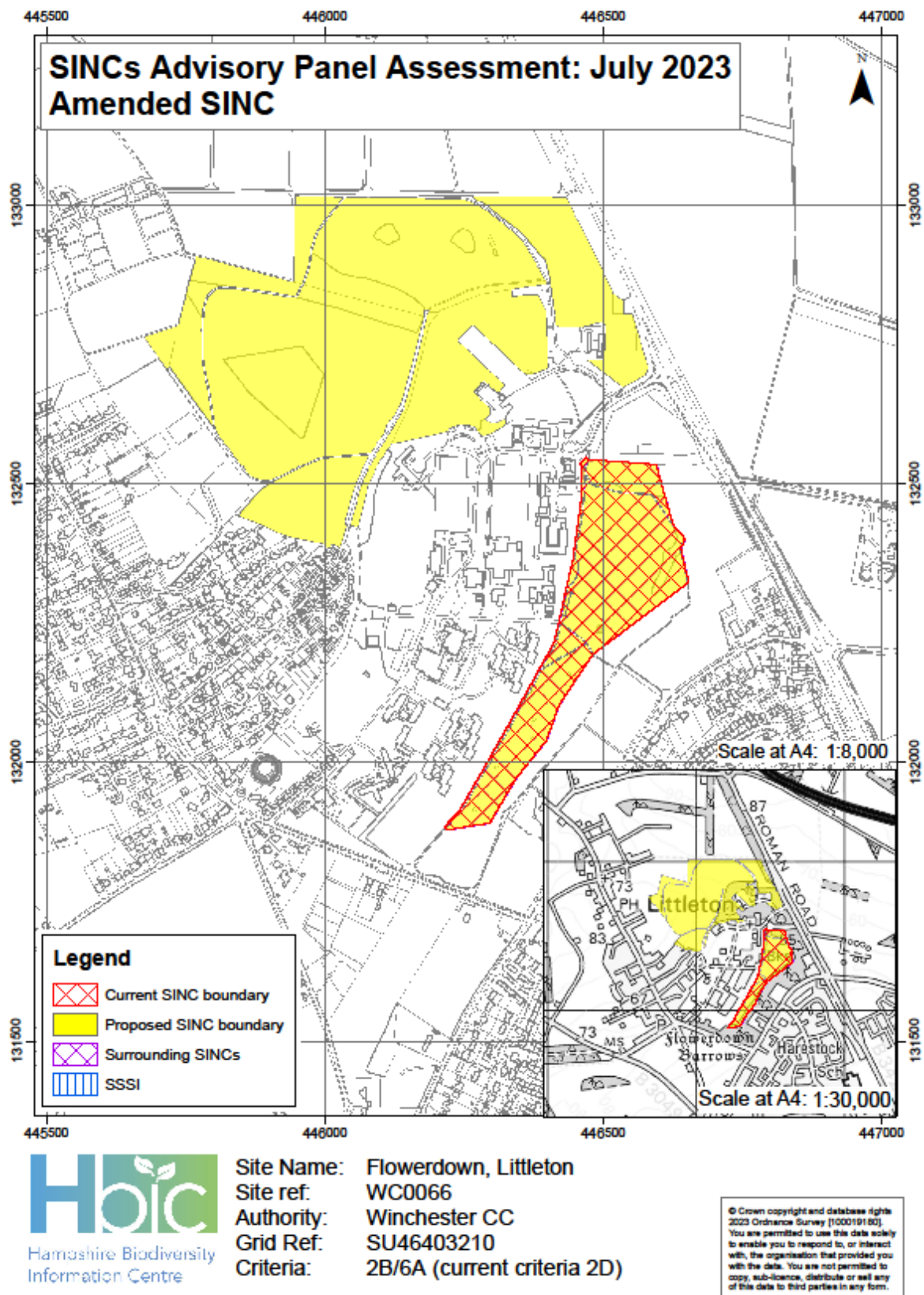


Figure 1: Proposal from the SINC Advisory Panel of the Hampshire Biodiversity Information Centre (HBIC)