
Winchester Local Plan

Local Plan Examination

Hearing Statement relating to: Matter 2 – Spatial Strategy and Distribution of Development Policies (SP1 – SP2 – SP3 – H1 – H2 – H3 – E1 & E2)

On behalf of: Bloor Homes Limited

Matter 2: Spatial Strategy and Distribution of Development Policies (SP1 – SP2 – SP3 – H1 – H2 – H3 – E1 & E2)

NB1 All references to the NPPF in this Statement (unless explicitly noted) are to the December 2023 version of the Framework, as paragraph 234 of the latest, December 2024, version of the Framework sets out that: “For the purpose of preparing local plans, the policies in this version of the Framework will apply from 12 March 2025 other than where one or more of the following apply (b) the plan has been submitted for examination under Regulation 22⁸⁴ on or before 12 March 2025”. However, it should be noted that as per paragraph 231 of the December 2024 version “The policies in this Framework are material considerations which should be taken into account in dealing with applications from the day of its publication. Plans may also need to be revised to reflect policy changes which this Framework has made”. As such, prior to and upon adoption of the Plan, the December 2024 version of the Framework will take effect.

Issue 1.1: Whether the spatial strategy and distribution of development is positively prepared, justified, effective and consistent with national policy.

Q.1. The Settlement Hierarchy Review (2024) scores settlements and groups them which provides the settlement hierarchy in the District. Is the methodology used robust and the outcomes accurate? Is the distribution of development between the tiers of settlements justified and how has it been established?

2.1. No comment.

Q.2. Is the spatial strategy and settlement hierarchy as set out in Strategic policy SP2 justified as an appropriate strategy, taking account of reasonable alternatives, and based on proportionate evidence?

Q.3. Is the proposed distribution of housing and other development supported by the evidence in the SHELAA, settlement hierarchy, and IIA, and will it lead to an appropriate pattern of housing and economic growth?

2.2. Bloor Homes Limited (referred to hereafter as ‘Bloor’) confirms that the below statement is a response to Q.2 and Q.3 to avoid repetition. All comments made are expansions upon Bloor’s Manor Parks Regulation 19 (R.19) representations.

2.3. **No.** Bloor does not consider that the spatial strategy and settlement hierarchy as set out in Strategic Policy SP2 is justified as an appropriate strategy, taking account of reasonable alternatives, and based on proportionate evidence or that the proposed distribution of housing.

2.4. As set out in Section 4 ‘Why Winchester’ of our R.19 representations, Bloor supports the overall vision set out at page 19 of the draft Local Plan (submission document SD01), however expresses concerns as to how the vision can be achieved through the current proposed spatial distribution strategy. The draft Local

Plan's development strategy identifies three 'spatial areas' within Winchester District (Strategic Policy SP2). Strategic Policy SP2 sets out an indicative requirement of 5,640 dwellings in Winchester Town (37.2%), 5,650 dwellings in South Hampshire Urban Areas (SHUAs) (37.3%) and 3,850 in the Market Towns and Rural Area (MTRAs) (25.5%).

- 2.5. Paragraph 9.6 of the draft Local Plan sets out that *"The Local Plan sets out a development strategy based on a sustainable settlement hierarchy (informed by the Settlement Hierarchy Review). Sites have been selected for allocation based on whether they would help deliver the Local Plan strategy, an assessment of their benefits and impacts (including Sustainability Appraisal and viability assessment) and whether they can provide the types of housing needed in various locations"*. Bloor raises no objection to a spatial strategy that delivers a balanced approach to housing that meets the needs of the Authority as a whole, however has serious concerns regarding the conflicts of Strategic Policy SP2 with the wider draft Local Plan objectives and policies and how the spatial strategy has been developed.
- 2.6. The draft Local Plan's spatial strategy insufficiently prioritises Winchester Town as the most sustainable location for growth. The proposed distribution of development commits disproportionate growth to areas with limited active travel and public transport infrastructure. This will result in an over-reliance on private car use that will inevitably lead to increased congestion, emissions, and community severance, negatively impacting resident health and well-being. This approach contradicts the Plan's own IIA criteria and conflicts with both current and emerging national planning policy, raising significant questions about the Local Plan's soundness. This is explained below.
- 2.7. Paragraph 2.1 of the Development Strategy and Site Selection (July 2024) document (SD10b) states that the growth strategy for the District was informed by a 'settlement hierarchy' approach which ranked and classified settlements based on the availability and accessibility of a broad range of facilities and services, a settlement's economic role and the environmental constraints to development. The spatial strategy resulted in the following spatial areas:
- Winchester Town Area (WTA);
 - South Hampshire Urban Areas (SHUA);
 - Market Towns and Rural Area (MTRA).
- 2.8. Paragraph 4.4 of the Transport Assessment (August 2024) recognises that *"there are disparities in transport provision across the district"* and this mirrors similar recognition set out in the 'Transport Assessment Stage 1 Report' (September 2020). In this respect, the evidence has been consistent over time.
- 2.9. Such differences are understood within paragraph 4.14 of the Transport Assessment (August 2024) (evidence base document ST15), which recognises that, within the South Hampshire Urban Areas, *"proximity to the strategic road network, combined with lower levels of amenities and employment*

opportunities with each urban area, encourages commuting trips to other towns being made by car, compounded by available public transport options being infrequent and limited in terms of accessible destinations and journey time”.

- 2.10. The transport baseline summary provided on numbered page 38 of the Transport Assessment report states *“most existing housing developments within the SHUAs provide footpaths which are attractive enough for most people to consider short trips by foot, however the distance to destination reduces the attractiveness of trips being made by this mode. Public transport options currently consist of limited and infrequent bus services between settlements...combined with lower levels of service for public transport and active travel modes means that the existing population is likely to have a relatively high dependency on private car travel...”*
- 2.11. The geography of part of the Market Towns and Rural Areas results in a broadly similar position as the SHUA and the transport baseline summary provided on numbered page 38 of the WCC R19 LP Transport Assessment report (2024) recognises that, *“based on the current situation, the relatively high distance from the settlements within this spatial area to the strategic road network may mean that increased development could result in higher congestion on the local road network as well as other transport related impacts such as vehicle collisions and reduced air quality”.*
- 2.12. Conversely, the transport baseline summary on numbered page 37 recognises that *“the Winchester Town Area has the highest levels of transport accessibility across the District, with services and supporting infrastructure for public transport, walking and cycling in the district.”* Furthermore, paragraph 4.61 recognises that *“Winchester Town Area is relatively small, compact and is visually attractive, meaning it is potentially conducive for most people choosing to walk for part, if not all of many regular journeys. In fact, most of the people who live and work in the city currently walk or cycle to work (60%).”*
- 2.13. The above statistic mirrors those presented by Bloor’s transport consultant in their Feasibility Report (Appendix 4 of our R.19 submission) which identified that the equivalent Winchester Town Area comprises more than 40% of the available jobs in the District – 11 times greater than the next largest area of employment. This is four times the size of the next largest cluster of job opportunities.
- 2.14. In this sense, Winchester Town Area will always remain the largest attractor of commuting trips in the District and this is recognised within the WTA transport baseline summary provided on numbered page 37 of the Transport Assessment (August 2024) report, which states that *“travel demand in highway peaks is primarily caused by the significant in and out-commuting patterns to/from the centre of Winchester and reflects the City’s role as a regional employment centre”.* Consequently, delivering significant growth in other areas will be highly likely to result in the need to commute to the city over a longer distance to access those opportunities.

- 2.15. However, on the Council's own evidence, such locations (i.e., smaller towns and villages) are poorly served by public transport and active travel connections, such that those longer distance journeys will inevitably need to be made by car – compounding existing congestion, delay, air quality and variance in public transport journey times within WTA.
- 2.16. This is in contrast to growth occurring within the WTA which would have access to more than 50% of the District's jobs [paragraph 4.56 of the Transport Assessment Report] within compact urban area which reduces travel distances, ensuring that over 60% of existing trips are already undertaken by non-car modes. In this way, there is a proven ability for trips to be undertaken without reliance on private car travel, in combination with an ingrained propensity for the existing population to actively travel by more sustainable modes. It is also true that such behaviour can more easily be influenced through vision-led strategies and travel planning interventions.
- 2.17. In addition to the above, the spatial strategy fails to demonstrate adequate integration with existing public transport networks and lacks a clear framework for aligning future development with public transport provision. Indeed, the proposed allocations outside of the WTA are on low frequency bus routes with significant journey times into the WTA, where over half of all journeys would relate to travel to access employment. This creates the conditions for car dominance that would result in more trips on the local and strategic road networks, compounding congestion and air quality issues.
- 2.18. Despite the fact that there is such explicit recognition that WTA is the most sustainable location for growth, throughout the various iterations of the evidence base, the draft Local Plan at Strategic Policy SP2, as above, sets out an indicative requirement of 5,640 dwellings in Winchester Town (37.2%), 5,650 dwellings in South Hampshire Urban Areas (SHUAs) (37.3%) and 3,850 in the Market Towns and Rural Area (MTRAs) (25.5%).
- 2.19. The spatial strategy proposes to deliver some 63.7% of growth outside of the Winchester Town Area and therefore, as recognised in the Council's own evidence, in less sustainable locations in the District. This is entirely misaligned with national policy and conflicts with the Plan policies and objectives.
- 2.20. The only reasonable conclusion to draw is that political motivation has had an unbalanced influence on the outcome of the Plan. This political interference has sought to detract from the consistent and explicit recognition of the significant locational advantages that exist in the Winchester Town Area, in contrast to physical and service barriers within the SHUA and MTRA.
- 2.21. The approach to the plan-making has not only distorted the strategy, which now not only conflicts with the draft Local Plan's stated objectives, but also with its emerging policies and with national policy. In its current state, the Local Plan is obviously unsound and further evidence and evaluation is required to underpin the current strategy, or to inform of a revised strategy.

Q.4. Have settlement boundaries been defined in accordance with a clear and easily understood methodology that is consistently applied?

2.22. No comment.

Q.5. Have all realistic options for the distribution of development within the District been identified and considered robustly in the formulation of the Plan?

2.23. **No.** Bloor does not consider that all realistic options for the distribution of development within the District been identified and considered robustly in the formulation of the Plan.

2.24. As per our response to the Sustainability Appraisal under Matter 1, the Council has inconsistently applied a 'policy-off' and 'policy-on' approach in the IIA methodology, with proposed allocations evaluated based on potential mitigation measures 'policy-on' improving their rankings and mitigation being discounted for omission sites 'policy-off'. As such, like-for-like comparisons have not occurred which raises concern that other options for the distribution of development, which as per our response to Q.2 and Q.3 could result in greater compliance with the draft Local Plan objectives being addressed, has occurred.

2.25. Bloor considers the Council's closed-minded approach to the distribution of development, following the distribution pattern of the adopted Local Plan likely due to political pressures, is evidenced by the fact that it has failed to adequately consider the social, economic and environmental benefits of allocating sites such as Manor Parks.

Q.6. Would the Plan's spatial strategy strike the right balance between the need for development across brownfield and greenfield sites and any related impact on housing affordability?

2.26. No comment.