

# **Winchester Local Plan Examination, April – June 2025**

Hearing Statement on behalf of Defence Infrastructure Organisation

Sir John Moore Barracks, Winchester

April 2025

**Matter 6 – Winchester Site Allocations / Winchester Housing Allocations**

**Policy W2 – Sir John Moore Barracks**

**Prepared by:** Robert Gardner

**Status:**Final

**For and on behalf of Avison Young (UK) Limited**

# 1. Introduction

- 1.1 Avison Young is instructed by Defence Infrastructure Organisation in respect of preparing an outline planning application to propose the redevelopment of the Sir John Moore Barracks (SJMB) site in Winchester (see Local Plan Policy W2 for site context etc.).

## 2. Policy W2 – Sir John Moore Barracks

**Question 1** *Given the length of the supporting text and policy requirements and repetition within both policy (criteria iv and xvii relating to existing buildings and facilities, criteria xiv and xvi relating to heritage assets) and supporting text (paragraphs 12.28, would the policy be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?*

### Response

- 2.1 The DIO has requested amendments to some of the numbered bullets points that comprise the wording of Policy W2 (as opposed to the supporting text). These amendments are intended to ensure that the requirements of the policy are reasonable. They also seek to remove ambiguity around the interpretation of policy requirements by a decision maker in the future. The amendments requested are addressed in responses to specific questions raised by the Inspector.
- 2.2 In principle, the DIO has no objection to the rationalisation / consolidation of the supporting text and policy wording contemplated by the Inspector in Question. The DIO reserves the opportunity to comment on any rationalisation or consolidation proposed as part of future consultation on proposed modifications.

**Question 2** *The policy supporting text includes requirements of a masterplan. That includes some matters included in the supporting text that are not included in policy e.g. the need for a lighting strategy, the requirement to ensure air traffic control signals are not compromised through development. In so doing, would the policy be effective?*

### Response

- 2.3 The Draft Local Plan includes policy D5 which relates specifically to Masterplans. Most of the DIO's comments in respect of Masterplans and their status in the determination of planning applications is provided in response to Question 3, below, and in response to the Inspector's questions regarding Policy D5.
- 2.4 The DIO has prepared a Concept Masterplan (CMP) for the site which has been endorsed by the City Council's Cabinet. The CMP includes an overview of lighting concepts and this will be expanded on at the planning application stage. Potential impacts on air traffic control signals cannot be assessed until details of proposed buildings are known, at the outline planning application or reserved matters stage of the process.
- 2.5 The DIO has no objection to the removal of these provisions from the supporting text, if they are to be included in the policy text, and maintains that the policy would be effective, subject to the amendments proposed.

**Question 3** *What would the status of the masterplan be and in dealing with matters to ensure the development of the site is acceptable in planning terms, would the policy be effective?*

## Response

- 2.6 The Cabinet Resolution in respect of the CMP states it will be a material consideration in the determination of a planning application to redevelop the site. The Cabinet resolution does not prescribe the weight to be given to the CMP in a future planning balance exercise.
- 2.7 The CMP was prepared with reference to existing and emerging development plan policy, including the emerging plan under examination, and Government policy and guidance.
- 2.8 The weight given in the planning balance will be assessed by the City Council when the application is determined. The weight given to the CMP will be informed by numerous factors, including the status of the Local Plan at the time the decision is made.
- 2.9 The DIO concludes that the Council's emerging policy has ensured a robust engagement and public consultation exercise has been carried out around the CMP for the site.

**Question 4** *What is the robust evidence to justify criteria vii which requires 'access off Andover Road', particularly given proposals at Barton Farm to divert and reroute Andover Road through that development? Given criterion vii would the Plan be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?*

## Response

- 2.10 The DIO supports the requirement to provide the main vehicular accesses to the site from the B3420 as a matter of principle. The existing vehicular access to the site is from the B3420.
- 2.11 The DIO's representations seek an amendment to the plan to refer to access from "Andover Road North". This is because there is some ambiguity over the distinction between Andover Road and Andover Road North. Maps suggest that the stretch of the B3420 that adjoins the site is "Andover Road North", whereas "Andover Road" appears to begin several hundred metres to the south east of the site. The amendment proposed would remove any ambiguity around the interpretation of the policy by a decision maker.
- 2.12 The supporting context for the policy requirement fails to make reference to early masterplanning work, highways and public consultation ahead of Reg 18. This established strong preference for no thru-route being created, save for any requirements for emergency access, from Kennel Lane/Chestnut Avenue. This led to the policy position of all movements from Andover Road North.
- 2.13 The DIO's other concerns in respect of vehicular access to the site relate to the capacity and alignment of the B3420 to the south-east. This is explained in our representations.
- 2.14 In summary, the B3420 is to be diverted through the Kings Barton site (proposed allocation W1). Therefore, all vehicular traffic will pass through the Kings Barton site.
- 2.15 The existing junction between the B3420, Harestock Road and Wellhouse Lane, at the northern end of the Kings Barton site, will be remodelled in due course. This junction is referred to as the "B3420 Andover Road / Harestock Road" junction. The junction has the reference number "5" in Figure 22 of the Winchester Local Plan 2020 – 2040: Transport Assessment – Strategic Transport Assessment. Figure 22 is titled – "2041 DS vs 2041 Baseline "Significant" and "Severe" Impacted Junction Locations". The Andover Road / Harestock Road junction is identified as experiencing "significant" impacts under the growth scenario contemplated by the Local Plan.
- 2.16 The design of the remodelled junction was approved as part of the grant of planning permission for the Kings Barton scheme. The overarching planning permission for Kings Barton includes a trigger for

the diversion of the Andover Road. The diversion must be in place before occupation of the 600th dwelling on the site.

- 2.17 The DIO is aware of discussions between WCC, Hampshire CC Highways and the owners of the Kings Barton site regarding proposed amendments to the approved junction design. The proposed amendment of the junction is to facilitate the safe separation of traffic heading south along the B3420 into vehicles (cars, vans, lorries and general traffic) that must follow the new alignment of the road (through the Kings Barton site) and vehicles (buses and cycles) that can proceed along the “old” alignment of the B3420 (and vice versa). Furthermore, the developers of the Kings Barton site have applied to increase the trigger point for diverting Andover Road from 600 occupations to 1000.
- 2.18 The Highways and Transportation work that underpins the Draft Local Plan is based on the approved junction design. Initial operational junction modelling by DIO of the amended junction design indicates that the implementation of the amended junction design will result in less traffic capacity and increased delays than the approved design and would deviate from the evidence on which the emerging Local Plan is based.
- 2.19 WCC has stated that a revised design for the junction will not need to pass through a formal town planning process (application, variation of existing permission or by other means). As such, interested parties will not have the opportunity to raise any issues or concerns around a potential decrease in capacity and increase in delays. It would be unreasonable to expect any landowner other than the owner of the King’s Barton site to be responsible for any implications arising from reduced junction capacity.
- 2.20 Furthermore, WCC’s acceptance of a revised junction design without proper consultation or examination could undermine the Council’s evidence base, which in turn could have significant implications for the soundness of the Local Plan when it is adopted in due course.
- 2.21 The DIO wishes to identify its concerns around the potential remodelling of the Andover Rd / Harestock Road junction without proper consultation.

**Question 5** *Given site constraints including its location within a settlement gap as defined by Policy NE7, heritage, open space, Protected Sites, flood risk etc, SINC and candidate SINC, what is the evidence to justify the quantum and mix of development proposed in policy W2?*

### Response

- 2.22 The DIO and its consultant team has carried out extensive technical due diligence work in respect of the site. This work is progressing as part of the preparation of a planning application. No matters have emerged that cannot be overcome through the ordinary methods commonly utilised to address technical matters. The DIO’s response to the above questions is provided, by topic, below

**Settlement Gap** – See response to Question 6, below

- 2.23 **Heritage** – There are no designated heritage assets on the site. The site was used to intercept radio signals during WWII. Radio masts were installed for this purpose. Some of the ground level concrete structures associated with the masts (bases and anchor points for wires) remain. Most of these are located in parts of the site where no development is proposed, for example in the existing SINC.
- 2.24 A planning application will include proposals for a Heritage Trail which will allow visitors to interpret and appreciate the remaining structures. Heritage is not a significant constraint on the quantum or mix of development contemplated by the emerging allocation.

- 2.25 **Open Space** – The site has a gross area of approximately eighty six hectares. Of this, approximately fifty one hectares (sixty percent) would be retained as open space. This space would comprise sports pitches, formal and informal play areas, a nature park and woodland. The provision of open space is not a significant constraint on the quantum or mix of development contemplated by the emerging allocation.
- 2.26 **Protected Sites** – The site is not subject to any of the designations that would give it the status of a protected site or area.
- 2.27 **Flood Risk** – WCC was one of ten Councils which collectively commissioned a “Level 1 Strategic Flood Risk Assessment” (SFRA). The document was published in 2023 and is up to date. The Level 1 SFRA covers most of Hampshire. Its purpose is to provide overarching information to inform the preparation of detailed flood risk assessments.
- 2.28 WCC subsequently commissioned the preparation of a “Level 2 Strategic Flood Risk Assessment” for the Winchester City Council area. It considers the SJMB site specifically. The SFRA is based on data held by the Environment Agency (EA). The EA’s mapping shows a small number of areas within the site with a high risk of flooding. The vast majority of the site is at very low risk of flooding.
- 2.29 The Level 2 SFRA states that an unnamed “main river” flows through part of the site. This is referred to as a “winterbourne” in draft Policy W2. A winterbourne is defined as a stream which only flows after periods of heavy rainfall. This description suggests the potential for fluvial flooding, i.e. from a river, and a flow of water from high ground to low.
- 2.30 The DIO has occupied the site for many years and has observed flood events during this time. During periods of prolonged and heavy rainfall water appears above ground in some of the areas shown on the EA’s flood risk map. The water in these areas does not flow. It is static and eventually disappears. This suggests the site is subject to ground water flooding, which occurs when the water table exceeds ground level in low spots on the site. The Level 1 and Level 2 SFRA’s refer extensively to ground water flooding and confirm this is a common type of flooding in Hampshire. This is due to the chalk aquifer that lies beneath large parts of the County.
- 2.31 The DIO has instructed a firm of hydrological engineers to explore the risk of flooding at the site. This work is ongoing. It is important to reach conclusions on whether the flooding that takes place on the site is fluvial or groundwater related. These two different types of flooding have very different implications for flood risk elsewhere in the catchment. Fluvial flooding involves flows of water which travel down-stream through the catchment. Alterations in the size or configuration of areas subject to fluvial flooding on an upstream site have the potential to increase the risk of flooding down - stream. This is because more water can travel down - stream or the same amount of water can travel down-stream faster than it might otherwise.
- 2.32 Ground water flooding commonly affects only the site on which it occurs. Changes to ground levels on such sites commonly carry relatively little risk of increasing flood risk down – stream.
- 2.33 Regardless of the type of flooding that occurs, the site is large enough to accommodate any attenuation that might be required. Approximately sixty percent of the site will remain undeveloped. We conclude that flooding is not a significant constraint to the quantum or mix of development contemplated by the emerging allocation.
- 2.34 **SINC** - The master-planning exercise that has identified the extent of the developable area for the site assumed that all of the existing SINC would be retained. We conclude that the presence of the existing SINC is not a significant constraint on the quantum or mix of development contemplated by the emerging allocation.

- 2.35 **Candidate SINC** – A future planning application must demonstrate that any protected species currently present can be accommodated satisfactorily on the redeveloped site. A ten percent net gain in biodiversity (either on site, off site or a combination of both) must also be demonstrated.
- 2.36 A team of specialist ecologists has been appointed to address these issues. Ecological and habitat surveys have been carried out. Approximately sixty percent of the site will remain undeveloped. This indicates that protected species can be accommodated and significant biodiversity net gain can be achieved on site.
- 2.37 The satisfactory resolution of the above matters (protected species and BNG) takes precedence over any locally based designations applied to the site (candidate SINC, SINC etc.). A SINC designation, either full or candidate, does not give a site “protected” status. The designation of a site as a SINC, either full or candidate, does not trigger any town planning related procedures, processes or consultations that would not be carried out in any event.

WCC has resolved to postpone its decision on the final status of the candidate SINC until the planning application stage. At that time the details of protected species mitigation and BNG will be known. *[I do not believe this statement in last sentence is correct therefore would exclude as it implies we are content to have the candidate SINC adopted with no impact on our development]***Question 6** What is the evidence that it would retain the settlement gap’s generally open and undeveloped nature so as to accord with Plan policy NE7?

- 2.38 The “Littleton / Winchester Gap” is bounded by Harestock Road to the south east, Stockbridge Road to the south west, the south eastern edge of the built up area of Littleton to the north west and by an undefined boundary that crosses the SJMB site to the north. Part of the settlement gap within the SJMB site accommodates large buildings. This area has been developed extensively and is not open.
- 2.39 WCC has commissioned a review of its settlement gaps. The Settlement Gap Review (the Review) was prepared by LUC and published in July 2024. The Review states the following at para 1.8;

“The Littleton/Winchester settlement gap has not been analysed in the Settlement Gap Review due to the ongoing master-planning for the Sir John Moore Barracks allocations. This master-planning process will determine the extent of built development, which will in turn inform any future review of the settlement gap, so analysing the settlement gap now would be premature.”

- 2.40 The above indicates WCC’s intention to review Settlement Gap boundaries in due course.
- 2.41 The DIO has requested that the settlement gap between Littleton and Winchester should be re-drawn. Our suggested revision to the settlement gap is illustrated on the attached plan at **Appendix A**. The drawing shows that the existing green infrastructure to the western SJMB boundary with Littleton, and to the southern SJMB boundary (including an existing SINC) would be retained and would continue to perform a buffer function to these adjoining settlements. The proposed revisions would correctly align the policy framework with the site allocation and would provide an appropriate policy to maintain a settlement gap between Littleton and Winchester. As a minimum, the settlement gap should be amended to remove the part of the site that already has numerous large substantial buildings on it.

## Response

**Question 7** Does it strike the right balance between protecting the special qualities of the locality and the need to ensure land is used efficiently in accordance with NPPF paragraphs 11a, 123 and 129?

## Response

- 2.42 The site falls within the NPPF definition of previously developed land (PDL). It has been lawfully developed with buildings, structures and associated open areas for the purpose of providing military training. This training is delivered indoors and outdoors across the whole site. All of the land surrounding the buildings is used for training as part of the overarching use of the site. The open areas on the site comprise the curtilage of the buildings and fall within the NPPF definition of PDL.
- 2.43 The NPPF establishes an obligation to make the best use of land and PDL in particular. This must be reconciled with requirements to maintain the special qualities of an area.
- 2.44 The CMP exercise carried out in respect of the site included extensive public consultation with local residents. Local character was discussed extensively. The DIO is confident that the determination process will ensure an appropriate balance is struck between efficient use of land and the preservation of local character.

**Question 8** *Are the policy requirements justified, in particular those that require a park and ride facility and are the policy requirements clear and unambiguous in their intent? Would they provide adequate flexibility to bring forward a high quality scheme that enhances the locality? Would the policy ensure open space and outdoor sports pitches to meet the needs of the proposed development and contribute to provision in the local area?*

## Response

- 2.45 **Park and Ride – Requirement for The Facility and Clarity of Policy Intent** – WCC has an aspiration to deliver a Park and Ride (P&R) facility to the north of City. This is part of a wider aspiration to reduce congestion in the city centre. WCC owns several car parking sites in the city centre which could be redeveloped for alternative uses if no longer needed to park cars.
- 2.46 The northern P&R scheme is mentioned in the City of Winchester Movement Strategy. The Movement Strategy does not refer to the Sir John Moore Barracks site specifically.
- 2.47 The DIO and WCC mooted the possibility of a “northern” P&R facility at SJMB during the initial discussions in respect of the site. The DIO concluded that some of its land at SJMB could accommodate a P&R. This led to the inclusion of references to a P&R scheme at SJMB in the emerging Local Plan. These references include a paragraph (xix) within the text of emerging Policy W2. References to a P&R scheme at SJMB in other Local Plan evidence base documents are summarised as follows.
- 2.48 **Local Plan Viability Report** – WCC instructed a firm of surveyors, the Dixon Searle Partnership, to assess the viability of the proposed Local Plan allocations. Appendix 3. of the “Local Plan Viability Report – Further Information” considers SJMB in detail. Para 2.8 of the document states;

*“A key requirement is likely to be land for Park and Ride provision and, although a scheme of this scale of housing (in Policy W2 of the Regulation 19 Local Plan) will not in itself generate the entire demand for up to an 850 space Park and Ride site, suitable land would need to be provided for the Park and Ride site along with any initial works and a financial contribution. This would need to be negotiated between the DIO, WCC and HCC (Hampshire County Council) as part of the planning application process, given the key need to provide an area than can deliver around 850 Park and Ride spaces to the north of the city centre. The site is considered suitably located for this and we understand that DIO/WCC/HCC discussions are currently ongoing regarding potential options and costs.”*



- 2.49 The above refers to the provision of land and confirms that the P&R scheme is not required to make the development of the SJMB site acceptable in planning terms.
- 2.50 **Infrastructure Delivery Plan** - The IDP refers to a P&R facility at SJMB. The table at page 57 states that WCC expects the DIO to provide land for the P&R and a contribution. It also states that the source of the shortfall in funding is "undetermined".
- 2.51 **Strategic Transport Assessment** – The STA has been prepared by the consultancy business "Hampshire Services" which is owned by Hampshire County Council. The STA refers to a P&R facility at the SJMB site extensively. The STA is clear that the main purpose of the P&R is to reduce traffic congestion in Winchester City Centre rather than to mitigate the impacts of traffic generated by the redevelopment of SJMB.
- 2.52 The STA states, at para 11.8;
- "Irrespective of priority, and where considered necessary following a review of mitigation works from subsequent individual planning applications, funding for the works identified in this STA will be secured in parts via Section 106 contributions based on the proportionate impact of individual development sites and upon review of the individual Transport Assessments/Statements to be submitted as part of any planning application for the sites."*
- 2.53 The above confirms that any financial contribution from the SJMB site towards the delivery of P&R should be proportionate to the mitigation of its traffic impacts.
- 2.54 The DIO has held extensive discussions with WCC and HCC in respect of the P&R. Numerous matters have been clarified, albeit some issues remain unresolved. The DIO has sought amendments to the wording of policy W2 in respect of the P&R.
- 2.55 In the interests of clarity, the DIO's position in respect of P&R is set out as follows.
- The DIO supports the provision of a P&R facility on the SJMB site as a matter of principle. An exercise has been undertaken to identify the optimum location for the P&R. The preferred location is identified in the CMP for the site which has been endorsed by WCC's cabinet.
  - A P&R facility, either on the SJMB site or elsewhere, is not required to make the delivery of the emerging W2 allocation acceptable in planning terms. The SJMB site is in a suitable, sustainable, location regardless of whether or not a P&R scheme comes forward.
  - The DIO is not a public transport operator / provider. A P&R scheme in the north of Winchester, either on the SJMB site or elsewhere, cannot be delivered or operated by the DIO. The Winchester Movement Strategy (a joint long term strategy by HCC and WCC) is clear in intent to expand existing capacity through investment in public infrastructure to support sustainable growth in the WMS July 2021 Phase 2 feasibility report, potential for 3<sup>rd</sup> party funding in part is identified as through development contributions.
  - The grant, implementation and completion of a planning permission for the redevelopment of the SJMB site is not contingent on the delivery of a P&R scheme, either in whole or part, on the site, or off site.
  - The starting point for the DIO's highways and transportation work that accompanies a planning application to redevelop the SJMB site will be a review of existing traffic conditions in the local area in the absence of a northern P&R scheme. This will include existing vehicles movements to and from the site.



- The impact of traffic generated by the redevelopment of SJMB on the surrounding highways network will then be assessed, again in the absence of a P&R scheme.
- The TA and EIA that accompanies a planning application will identify any mitigation that might be needed on the local highway network to ensure any impacts arising are not severe. This assessment of mitigation will assume the absence of a P&R scheme in the north of Winchester. A financial contribution towards off-site highway works might be required, subject to the outcome of the exercise.
- A legal agreement completed in association with the grant of planning permission will identify the quantum of any contribution that might be payable by the developers of the site in respect of highways. The legal agreement will also include triggers for the payment of the financial contribution.
- WCC / HCC will have the option to either spend the highway contribution on upgrades to highways infrastructure or on a P&R scheme. The legal agreement will ensure the DIO or its successor in title is able to discharge any obligations in respect of highways through the payment of a financial contribution. The implementation and completion of the SJMB housing scheme cannot be delayed by or in any way linked to the delivery of a P&R facility.
- In addition to the potential payment of a financial contribution, the DIO will provide a parcel of land to accommodate the P&R. The window during which the parcel will be available to WCC or HCC will be specified in the legal agreement. If WCC or HCC is unable to accept the P&R land parcel within the prescribed window it will revert back permanently to the DIO or its successor in title.

2.56 The DIO maintains that its proposed modifications to Policy W2 would ensure that its proposals for the redevelopment of SJMB could comply with policy and the position set out in the bullet points above. However, if the Inspector or WCC wished to amend the policy further, to clarify the DIO's responsibilities and obligations in respect of the P&R (in line with and as set out in the bullet points above), the DIO would have no objection in principle. The DIO reserves the opportunity to comment on any rationalisation or consolidation of policy wording proposed as part of future consultation on proposed modifications.

***Flexibility to Deliver a High Quality Scheme That Enhances The Locality***

2.57 The DIO is comfortable that if its proposed amendments are made the policy will allow sufficient flexibility to deliver an excellent scheme which will create a vibrant and attractive community.

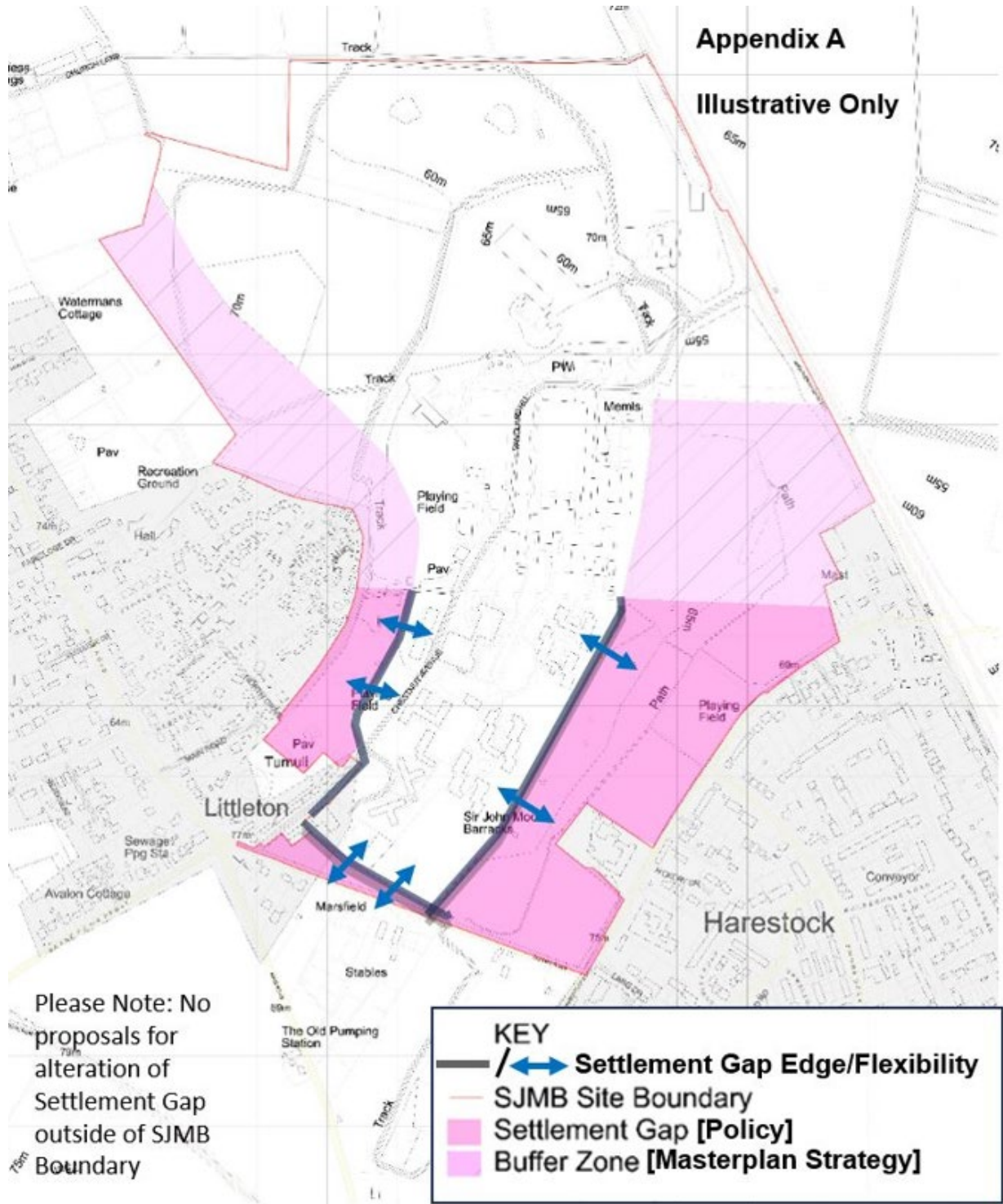
***Open Space and Outdoor Sports Pitches to Meet the Needs of Development and Contribute to Provision in the Local Area.***

2.58 Policy W2 includes requirement i) which establishes criteria for inclusion in a site wide masterplan. The criteria include green spaces.

Policy W2 does not include a specific reference to playing pitches. However, Policy NE 3 proposes general provisions around parks, sports and recreation facilities that would apply to proposals to redevelop the site.

## Appendix A

Illustrative Only



## Contact details

### Enquiries

Rob Gardner  
07919 047 959  
[Robert.Gardner@avisonyoung.com](mailto:Robert.Gardner@avisonyoung.com)

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[avisonyoung.com](https://avisonyoung.com)