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# Winchester Local Plan

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## Local Plan Examination

Hearings Statement relating to: Matter 13 –  
Sustainable Transport and Active Travel

On behalf of: Bloor Homes Limited [R.19 reference  
- #ANON-AQTS-3BQA-Z]

## Matter 13: Sustainable Transport and Active Travel

**Issue 1.1: Would the Plan's transport strategy and the individual policies be clear, justified and consistent with national policy and would they be effective?**

*Strategic Policy T1: Sustainable and Active Transport and Travel*

**Q.1. Is the Strategic Transport Assessment [ST15] based on a sound methodology and are the conclusions reasonable, in concluding that the quantum and distribution of the development proposed in the Plan, and the resulting transport impacts, are capable of mitigation at the strategic level?**

- 13.1. **No.** Whilst Bloor do not wish to comment on the methodology of the Strategic Transport Assessment ('STA') (submission document ST15), the STA appears to be silent on any clear conclusion relating to the suitability of the Plan strategy in the context of transport impacts. Section 7.4 of the STA alludes to the fact that, even with mitigation, 21 junctions are identified as experiencing either a significant (13) or severe (8) impact. Of these, paragraph 7.4.3 is clear that in seeking to mitigate impacts at five junctions, the package of mitigation measures, whilst achieving this, resulted in impacts at a further eight junctions becoming classified as significant or severe.
- 13.2. Paragraph 4.4.4 merely recommends *"that these junctions again form the basis of a review to determine any further mitigation or connectivity measures should be considered as part of the Local Plan."* No further evidence has been provided to suggest that such work has been undertaken and indeed the Infrastructure Delivery Plan appears generally light in respect of new infrastructure.

**Q.2. How has the Strategic Transport Assessment, including its findings in relation to park and ride infrastructure, informed the Plan?**

- 13.3. It is unclear precisely how the Strategic Transport Assessment may have informed the Plan given that 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), and yet the Spatial Strategy proposes 62.8% of the growth in the less sustainable locations.
- 13.4. Only 37.2% of growth is proposed in the Winchester Town Area which is recognised at page 37 of the STA 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%)”.*

- 13.5. The spatial strategy and therefore the draft Local Plan ('LP') (SD01) as a whole clearly conflicts with the findings of the STA.

**Q.3.** *The supporting text to strategic policy T1 runs for many pages and is repetitious in places (e.g. the key issues repeat previous text in places). Taken together, would the supporting text and policy be clear, unambiguous, so it is evident how a decision maker should react to development proposals?*

- 13.6. **No.** Bloor wishes to identify the clear conflict that exists, in particular, between Policy T1(iii) , which requires priority to be given to 20 minute neighbourhoods, against paragraphs 6.21 and 6.10 of the draft Local Plan which indicate that such requirements only apply within the Winchester Town Area.
- 13.7. Indeed, paragraph 6.10 embeds the principles of 20-minute neighbourhoods (rather than 15-minute neighbourhoods) but goes on to recognise that the concept of 20-minute neighbourhoods does not work for the whole of the district. Paragraph 6.11 continues in this vein, recognising that the draft Local Plan has a *“key role to play in promoting sustainable transport modes and how the plan can be used to promote the concept/principles of 20 minute neighbourhoods”* but conflicts this by stating *“it is important to recognise that whilst we want the design process to really focus on and prioritise sustainable modes of transport over the private car because of the rural nature of the district, it may not be possible to completely rule out the use of the private car”*.
- 13.8. Conversely, Policy T1(iii) merely requires that transport assessment should be prepared to prioritise the delivery of 20-minute neighbourhood principles, without limitation.

**Q.4.** *How has the concept and principles of ‘20 minute neighbourhoods’ informed the Plan’s spatial strategy as set out in strategic policy SP2?*

- 13.9. **No.** Bloor do not consider that the principles or concepts of 20-minute neighbourhoods have informed the Plan’s spatial strategy.
- 13.10. It is noted at paragraph 6.21 of the draft LP – which provides part of the supporting text to Strategic Policy T1 Sustainable and Active Transport and Travel – that *“the location...of development will need to demonstrate significant prominence and priority being given to those walking, wheeling and cycling, using public transport service such as local buses or other public transport network”*.
- 13.11. Consequently, the draft LP explicitly requires that locational characteristics, and in this case, the ability to deliver growth in line with the 20-minute neighbourhood concept is a priority. However, the Paragraph 9.6

of the R19 LP 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”*.

- 13.12. As set out within our Matter 2: Spatial Strategy Distribution Hearing Statement, 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, the Settlement Hierarchy Review (DS01) process was absent of any appraisal of the extent to which locations are, or could be made to be, supportive of the need to deliver growth under 20-minute neighbourhood principles.
- 13.13. This also begs the question why paragraph 6.10 of the Plan limits application of the 20-minute neighbourhood principles to the Winchester Town Area only, when no evidence has been prepared of other areas and their ability (or otherwise) to ensure the spatial strategy is able to contribute in a meaningful way to the vision and net zero obligations. Notwithstanding the above, it is evident that the spatial strategy could not have been informed by the principles or concept of 20-minute neighbourhoods.
- 13.14. We also note that this lack of any formal assessment in the Settlement Hierarchy Review is likely to be one contributory factor to the issues we have raised within our Matter 2: Spatial Strategy and Distribution of Development Policies Hearing Statement, and Section 4 ‘Why Winchester’ of our R.19 representations, which is that the spatial strategy insufficiently priorities Winchester Town as the most sustainable location for growth.
- 13.15. Repeating those points here; the LP’s development strategy identifies three ‘spatial areas’ within Winchester District (SP2). Strategic Policy SP2 sets out an indicative requirement of 5,640 dwellings in Winchester Town (WTA) (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%).
- 13.16. The proposed distribution of development commits disproportionate growth to areas with limited active travel and public transport infrastructure, which are core to the delivery of 20-minute neighbourhood principles. 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 draft LP’s soundness, explained below.
- 13.17. 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: -

- WTA;
- SHUA; and
- MTRA.

- 13.18. 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. These disparities are likely to strongly correlate with an inability to deliver on 20-minute neighbourhood principles.
- 13.19. Such differences are understood within paragraph 4.14 of the Transport Assessment (August 2024, which recognises that, within the SHUAs, *“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”*.
- 13.20. The transport baseline summary provided on numbered page 38 of the 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...”*.
- 13.21. The geography of part of the MTRA 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”*.
- 13.22. 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%).”*

- 13.23. The above statistic mirrors those presented by Bloor's transport consultant Calibro in their Feasibility Report (Appendix 4 of our R.19 submission) which identified that the equivalent WTA comprises of 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.
- 13.24. In this sense, WTA 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 inevitably result in the need to commute to the city over longer distance to access those opportunities.
- 13.25. However, on the Council's own evidence, such locations 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.
- 13.26. This is in contrast to growth occurring within the WTA which would have access to more than 50% of the District's jobs 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.
- 13.27. 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 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.
- 13.28. Despite the fact that such explicit recognition that WTA is the most sustainable location for growth has been provided throughout the various iterations of the evidence base, the R19 LP at Strategic Policy SP2, as above sets out an indicative requirement of 5,640 dwellings in WTA (37.2%), 5,650 dwellings in SHUAs (37.3%) and 3,850 in the MTRAs (25.5%).
- 13.29. The spatial strategy therefore proposes deliver some 63.7% of growth outside of the WTA and therefore, as recognised in the Council's own evidence, in the least sustainable locations in the District. This is entirely misaligned with national policy and conflicts with the Plan policies and objectives.

- 13.30. 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 WTA, in contrast to physical and service barriers within the SHUA and MTRA.
- 13.31. The approach to the plan-making has not only distorted the strategy which now not only conflicts with the R19 LP's stated objectives but also with its emerging policies and with national policy. In its current state, the LP is obviously unsound and further evidence and evaluation is required to underpin the current strategy – or to inform of a revised strategy.

**Q.5.** *Would strategic policy T1iii, in seeking development to prioritise the concept of 20 minute neighbourhoods, be clear and unambiguous?*

- 13.32. **No.** Bloor considers there to be clear conflict throughout the Plan that would create uncertainty in the application of 20-minute design concepts.
- 13.33. Whilst the concepts of 20-minute neighbourhoods is referenced within the Plan's vision on page 19 of the draft LP, paragraph 6.10 seeks to clarify that the principles are only applicable to WTA *"and in parts of the district where this is achievable whilst recognising that the concept of 20 minute neighbourhoods does not work for all of the district"*. This approach is also reflected in the supporting narrative under Strategic Policy T1 which accepts that not all development could achieve compliance with the principles of a 20-minute neighbourhood because of the rural nature of the district.
- 13.34. The Plan therefore introduces a two tier system for planning and delivering for sustainable development. The rationale for this is both unclear and unsound against policy.
- 13.35. Moreover, this approach risks delivery of the overall vision because the spatial strategy allocates the overwhelming majority of growth in the least sustainable areas of the district which, by the Plan's own admission, are less likely (and not required to) deliver under the principles of 20-minute neighbourhoods.
- 13.36. There is also clear conflict and ambiguity at paragraph 6.23 which states that *"for a site to be considered sustainable outside of existing settlement boundaries in respect of accessibility, it will need to be demonstrated that the intended use and occupiers have reasonable prospect of a choice of sustainable travel modes of transport to key destinations. Where it is proposed to improve the transport credentials of a site by means of contributions to the transport infrastructure serving it, it would need to be demonstrated that the suggested measures were feasible, viable and are sustainable"*.



13.37. The majority of growth is planned to occur outside of existing settlement boundaries, where arguably there could be reduced opportunity to deliver under the 20-minute neighbourhood principles, yet the Plan seeks to introduce a potentially higher threshold of connectivity to “*key destinations*” via a “*choice of travel modes*” than might be applicable elsewhere.

**Q.11.** *Would strategic policy T1, in its requirement for a transport assessment be clear and unambiguous and would it accord with national guidance in this respect?*

13.38. **No** – Bloor wishes to highlight that the requirements under 117 of the 2023/NPPF state that only planning applications for “*developments that will generate significant amounts of movement*” should be accompanied by a Transport Assessment. The wording of policy T1 as written currently implies that any development generating even a modest increase in movement would require a Transport Assessment. However, since almost all development will result in at least some additional movement, the implication of the policy wording would be to require almost every planning application to be accompanied by a Transport Assessment.

13.39. Bloor does not believe that is the intention and rewording is needed.

**Q.12.** *In all other ways, would strategic policy T1 be clear and unambiguous, so it is evident how a decision maker should react to development proposals?*

13.40. **No** – Bloor wishes to make reference to obvious conflict or ambiguity between T1 (iii), which requires priority to be given to 20-minute neighbourhoods, with paragraphs 6.21 and 6.10 of the Plan which indicate that such requirements only apply within the Winchester Town Area.