## Cycle Winchester notes on

#### General

#### Prioritising: fails effectiveness test.

Numerous policies mention "prioritising" cycling, walking and wheeling. While a layperson reading this might assume it means "give them top priority" it's not what the word actually means.

To prioritise is just to place a number of things in priority order. A developer or transport consultant could claim "Yes, we prioritised cycling and walking along with everything else and it came out at number 9 in our priority list, just below 'extra-big parking spaces for SUVs'."

Strongly suggest replacing this term with "priorities cycling, walking and wheeling above other forms of transport".

**LCWIP**: fails effectiveness and positively prepared tests

The emerging Winchester City LCWIP (Local Cycling and Walking Network Plan) and Winchester District LCWIP are only occasionally mentioned in this document and are not referenced directly by many of the policies where they should be relevant.

Both LCWIPs are still under development, but it's reasonable to assume that by the time this Plan comes into effect, both will be in a usable form and will have procedures in place for their maintenance and development as per DfT guidance.

As the DfT guidance on LCWIPs makes clear, one of the main purposes of an LCWIP is to provide information for developers and authorities on *how* developments can contribute to and link into an effective active travel network in the authority's area. It is therefore vital that these policies (and not just the supporting text) directly reference the LCWIPs wherever appropriate.

Without robust LCWIPs and direct references to them in the Local Plan, the Local Plan will fail to deliver a usable cycling network.

## Policy T1: Sustainable and active transport and travel

Fails on being positively prepared, effective and consistent with national policy.

The policy requirements here are too vague and ambiguous to be effective.

It is not enough for the developer to include a transport assessment that quantifies these things: it must show how the development will achieve them.

**Para ii** is especially ambiguous: it should be made clear that the phrase "reduces the number of trips made by private motor vehicle" means a reduction compared to the levels *prior to the development*. As currently worded it would allow developers to create an initial prediction of large traffic increases, then produce a transport assessment that makes the increase slightly smaller and claim that they have fulfilled the terms of the policy. This has happened in developments under the current Local Plan; the revised Local Plan does nothing to strengthen or clarify the requirement.

**Para iii** is also ambiguous and ineffective. "Prioritising the concept of 20-minute neighbourhoods" means nothing in practice.

At the very least it could be expanded to add "... by demonstrating how residents or workers in the development will be able to reach a range of retail, leisure and service facilities within 20 minutes using active travel means."

**Para iv** needs to refer explicitly to the city and district LCWIPs, as without this the definition of "wider network" is open to abuse.

**Para vii**: to be consistent with para ii, this needs to demonstrate that the use of new or existing accesses will not lead to an increase in the overall level of motor traffic. This is not the same as "significant congestion/delays".

**Para viii** needs to mention secure, covered storage for cycles explicitly (including non-standard pedal vehicles such as cargo bikes and trikes). This is the top priority for encouraging cycle travel. The phrase "lockers/storage" could be interpreted as meaning simply storage for clothing.

## Policy T2: Parking for new developments

Fails on being positively prepared, effective and consistent with national policy.

**Para i** again has a problem with the ambiguous use of "prioritised". Needs to make it clear that this means "prioritised *above* motor vehicles".

**Para iv** is ineffective without a standard for the quantity of cycle parking, with levels set for both resident and visitor parking. The council does not have a standard for this, and it needs one.

We suggest referring to such a standard here and ensuring one is in place by the time this plan is approved.

**Para v** is ineffective without some kind of guidance. As it stands, it is a loophole that would enable a developer to ignore much of the rest of this policy.

To be consistent with the rest of the policy, it should indicate that such parking will only be considered if the developer has demonstrated how access by sustainable transport modes – including suitable cycle parking – have been given higher priority.

# Policy T3: Enabling Sustainable Travel Modes of Transport and the Design and Layout of Parking for New Developments

Fails on being effective.

This appears to be referring only to car (and other motor vehicle) parking. This should be made explicit.

# Policy T4: Access for New Developments

Fails on being positively prepared, effective and consistent with national policy.

**Para i** needs to reference the city and district LCWIPs explicitly as guidance. Without this there is no clear definition of what routes "to, from and within the site" means, so the policy cannot be effective.

It should also add "through" the site to that list to be compliant with national policy: , as new developments are often an opportunity to improve permeability for active travel (e.g. Sir John Moore Barracks redevelopment).

Para v is far too ambiguous to be effective. It needs to define "reasonable".

For example it could specify that such sites should have direct access onto an trunk or 'A' road, with access via 'B' and 'C' roads only to be considered if the road in question has not been identified as an active travel route.

Unclassified roads should never be an acceptable access route for large numbers of HGVs. This is especially important in rural and semi-rural areas.

To be consistent with para i it also needs to specify that site design should ensure that safe, convenient and segregated active travel access into the site is provided in a situation where there are many HGV movements.

## Policy NE4: Green and Blue Infrastructure

Fails on being positively prepared, effective and consistent with national policy.

To address the ambitions laid out in the Transport section, this policy needs to be more explicit about the non-motorised travel routes it describes. Without this is will fail to address national policy and it will not be positively prepared.

The disused railway line routes are all identified as potential active travel routes in the District LCWIP, which means they need to be not just safeguarded but upgraded to provide an all-weather surface and access suitable for walking, cycling and wheeling year-round for utility purposes.

The advent of e-bikes means that cycle-commuting from Alresford and the upper Itchen Valley villages to Kings Worthy (and on to Winchester) would be viable, as would commuting from the Meon Valley villages to Wickham.

The one exception at present is the Meon Valley Trail, which was missed off the first draft of the district LCWIP but is likely to be included in future revisions – not least because the East Hants LCWIP includes a plan to upgrade the Meon Valley line north from West Meon to Alton to an active travel route, so the southern section needs to link with this.

The failure to identify this important link with both the Fareham and East Hampshire LCWIP networks indicates a failure to agree priorities with neighbouring authorities and a failure to deliver effective cross-boundary working.

To be effective, this section needs to specify that any development near to these lines should show how it will contribute to *improving* them as active travel routes, not just preserving them.

## Policy NE7: Settlement gaps

Fails on being effective.

This policy is not consistent with the Transport policies as it stands, nor with national policy.

Many of the named gaps divide satellite settlements from larger villages or towns which contain employment and services that residents of the satellite settlements need to access.

The Transport policies aim to provide safe, usable active travel routes between these locations.

To be consistent, this policy should therefore make it clear that it does not preclude the creation of high-quality, well-surfaced, appropriately-lit active travel routes across the settlement gaps.

Without this exception, there is a danger that policy NE7 will be used as an excusef or developers (and the highway authority) to avoid contributing to active travel routes between settlements, resulting in a failure to deliver on the Plan.

## Policy NE13: Leisure and Recreation in the Countryside

Fails on being effective.

To be consistent with the Travel policies, any development of this kind should provide active travel access and should contribute to the wider district active travel network.

Developers should be able to demonstrate how potential visitors can reach the facility by active travel means and/ public transport from nearby settlements. (Note: Saying "It's within 5 miles of a National Cycle Route so that's OK" should not be considered an adequate response.)

## Policy NE14: Rural Character

Fails on being justified and effective.

"The impact resulting from the volume and type of traffic generated by the development will be assessed along with the ability of rural roads to accept increased levels of traffic without alterations that would harm their rural character."

This conflicts with policy T1, where developers are expected to demonstrate that their development will *not* add to existing traffic levels.

This is especially important for rural roads that are recognised – or identified in the district LCWIP - as being part of rural active travel routes.

As it stands, this policy undermines the Transport policies and contradicts national policy. The policy should be worded to guard against traffic increases on rural roads, especially (as noted above) where these would impact on rural cycle routes connecting settlements.

## Policy H6: Affordable housing

Fails on being effective.

No mention of requirement to develop in an area served by affordable means of transport. Occupants of affordable housing are more likely to be in lower-income brackets and therefore less likely to have access to private cars, so have greater-than-average requirements for good public and active travel links. . (A Health Foundation study in 2024 reported that in the poorest quintile of households, 28% have no access to a car.)

## H9 Purpose Built Student accommodation

Fails on being effective and consistent with national policy.

"ii. The location of the accommodation is easily accessible to the establishment it is planned to serve by existing / proposed walking, cycling or public transport routes;"

This should be "walking, cycling **and** public transport". Sustainable transport is about providing as many options as possible. It shouldn't be acceptable to provide accommodation that (for instance) is accessible only by bus or car, not by bike or foot.

"iii. Adequate cycle and car parking provision is made within the development, designed to encourage active travel, discourage private car use, and avoid unacceptable increases in onstreet parking in the surrounding area"

Self-contradictory policy. "Adequate" car parking provision only encourages private car use. Regulation can be used to limit on-street parking in the surrounding area.

To meet the aims of the Transport policies, use of private cars needs to be discouraged.

## Policy H12 Gypsies, Travellers etc.

Failes on being effective and consistent with national policy.

"ii. Sites should be accessible to local services such as schools, health and community services by public transport, on foot or by cycle"

Again this should be "... on foot **and** by cycle" to beconsistent with national policy and to ensure developers don't try to avoid their responsibilities by enabling access to only one form of travel.

## Policy W1 Barton Farm

Failes on being effective.

**Para vi** only mentions the Winchester District LWIP. Part of this development is within the Winchester City LCWIP area so this should also be referenced.

## Policy W2: Sir John Moore Barracks

Failes on being effective and consistent with national policy.

**Para vii** should make it clear that "access" here refers only to motor vehicle access. It is expected that there will be multiple pedestrian, cycling and wheeling access points to fulfil the requirements of para viii.

**Para viii** fails to mention either the District LCWIP or the City LCWIP, both of which are relevant to this area, which falls on the boundary between the two and deliver key links for both.

# Policy W5: Bushfield Camp

Fails on being positively prepared, effective and consistent with national policy.

**Para v** should specify active and sustainable travel links to Shawford station as well as Winchester station. Shawford station is currently under-utilised: as it is likely that a large proportion of the workers on the site will be arriving from the south of the county, this is an obvious connection. Failure to take this into account will have a knock-on effect for neighbouring authorities.

## Policy W8: Station Approach Regeneration area

Fails on being effective and consistent with national policy.

Fails to reference the city LCWIP, which is very relevant to this area.

## Policy W10: Former River Park Leisure Centre site

Fails on being effective and consistent with national policy.

Again, fails to reference the city LCWIP or the need for suitable cycling, walking and wheeling routes connecting the area. This area is currently a weak link in several potential active travel routes and any development should be required to resolve that.

## Policy W11: University/Hospital

Fails on being effective and consistent with national policy.

Though para iv mentions cycle and pedestrian access it fails to reference the city LCWIP. As a major employment area, improving the cycling network into and around this site should be a requirement.

## Policy SH11: Newlands

Fails on being positively prepared, effective and consistent with national policy.

Fails to specify any requirement for active travel connections to surrounding settlement apart from a passing mention of Waterlooville centre. No mention of the District LCWIP despite mentions in the supporting text. There is no evidence that links outside the district have been allowed for.

## Policy SH2: Whitely

As for SH1.

## Policy NA1 The Dean

Fails on being effective and consistent with national policy.

Very weak on access. No indication of what off-site improvements might be necessary. The area round the West St/The Avenue junction is an obvious example: development off the Dean is bound to have a major effect on traffic at this junction, which is already hazardous for cyclists. However without any indication of specific areas, developers will be able to get away with little or no contribution.

The district LCWIP should again be referenced.

## Policy NA2 Sun Lane

Fails on being effective and consistent with national policy.

**Para v:** Again, should make it clear that "access" limits described here apply only to motor vehicle access, not active travel access.

As for NA1 above, the requirement to provide "off-site" improvements for pedestrian and cycle travel is far too vague and open to abuse. These need to be outlined and linked to the District LCWIP.

## Policy NA3: Neighbourhood Plan area

Fails on being effective and consistent with national policy.

Fails to mention a requirement for active travel access at all.

## Policy CC1 Clayfield Park

Fails on being effective and consistent with national policy.

As above, very weak on access. Vaguely phrased and open to abuse.

## Policy CC2 Colden Common Farm

Fails on being effective and consistent with national policy.

As for CC1.

## Policy CC3 Land at Main Road

Fails on being effective and consistent with national policy.

As for CC1. Para v does at least mention supporting active travel opportunities but fails to give any indication of how or to reference the Winchester District and Eastleigh LCWIPs.

## Policy KW2

Fails on being effective and consistent with national policy.

As for CC1. Fails to reference district LCWIP; manages to reference the A33/B3047 junction but does not make it clear that cycle and pedestrian access **across** that junction must be improved.