

# Examination of the Winchester District Local Plan 2020-2040 (Taylor Wimpey UK Limited and Vistry Group: ANON-AQTS-3BX4-T - Nexus Planning)

## Matter 6: Winchester site allocations

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

### Winchester housing allocations

#### Policy W2 Sir John Moore Barracks

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?*

The policy as drafted includes areas of ambiguity and repetition such that it fails to accord with the guidance provided within NPPG<sup>1</sup> that all plans (policies) should be focussed, concise, and accessible and where sites are proposed for allocation sufficient detail should be given to provide clarity regarding the nature and scale of development that is expected to come forward. PINS guidance<sup>2</sup> also requires that the LPA should rigorously assess the plan before it is published under R.19 and should only include policies that are clear regarding development that is being planned for, with careful attention paid to deliverability and viability.

Paragraph 12.15 preceding Policy W2 states that the site is ‘defined in a broad way’ and that a ‘working assumption’ has been made that the site ‘could accommodate about 900 dwellings’. The LPA will no doubt state that this is entirely appropriate, but any reader of the policy would be entitled to conclude that a ‘working assumption’ is something used at an early stage in defining how a policy will be formulated, before defining with ‘clarity’ the nature and scale of the development that is planned. This paragraph provides an insight regarding the extent to which the firm assumptions can be made regarding the status of this potential development opportunity and the weight that ought to be attributed to it.

Paragraph 12.28 provides a further example of the ambiguity inherent in the policy: The paragraph opens stating that there are no structural remains or buildings of heritage significance within the site. However, it then lists a series of features including the Chapel (which contains historical features), a pair of gates, and several statues, in respect of which: ‘Given the site’s military history, it will be important that any key features of heritage significance mentioned above, and the Chapel are incorporated and celebrated...to help create a sense of place.’ While these features do not necessarily preclude development taking place, the contradictory nature of the description of them indicates a lack of clarity and understanding of the site and the potential for development it offers.

Representations were made regarding Policy W2 at R.19 stage that continue to apply.

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?*

It is unclear from the wording of the Policy what the status of the ‘masterplan’ would be and what mechanism the approval process for any such masterplan would follow. This provides further evidence that the policy is not fully formed because it is ambiguous and lacks the clarity required.

<sup>1</sup> ID: 61-002-20190315

<sup>2</sup> Procedure Guide for Local Plan Examinations (28/08/24) – S.1, 1.1

Paragraph 12.26 provides that a future masterplanning process will be needed/expected to inform how the site is developed. While this is not unusual, taken with the incorporation of the 'working assumption' relating to the development capacity of the allocation, it is apparent that the LPA did not, at the time the plan was submitted, have a firm understanding of how the site will be developed, and importantly, clarity regarding the capacity and future distribution of development across the site, even in broad framework terms.

The list of Examination documents includes a Sir John Moore Barracks Concept Masterplan (2025) (ED12), published on 18th February 2025 (following submission of the Local Plan). This document was endorsed by the WCC Cabinet at the meeting of 12<sup>th</sup> February 2025. It is described as a Concept Masterplan Vision Document, prepared on behalf of the DIO (the promoters of the site). The title infers that it presents a vision for a concept, which the document advises '*has changed considerably in response to consultation*' (p.4). The Executive Summary refers to the engagement that has taken place in preparing the concept masterplan, with a timeline commencing in Autumn 2023 when Vision and Development Principles were discussed with the public and stakeholders. However, public consultation exercises associated with the site significantly pre-date this timeline; in December 2020 the consultation website, which included a concept masterplan, predicted that a planning application would be submitted in 2021, with development commencing on site sometime during 2022. The point to be made is that work to identify the potential of the site dates back at least five years, which calls into question why there is not a much firmer understanding of the capacity of the site and an established framework for development of the site that could be enshrined in the draft policy (which could then inform preparation of a masterplan in due course)?

While the site presents an opportunity to form part of a comprehensive spatial strategy for Winchester and the district more widely, should it become available for redevelopment in the future, the numerous uncertainties that are manifest within the policy and the supporting text indicate that the required clarity for a major strategic allocation is currently absent. W2 and the supporting text read like a prospectus that identifies a development opportunity rather than a policy within a Local Plan that prescribes how a proposal should be brought forward.

ED12 provides a summary of the content of the document in the text box on p.55 (Appendix) noting that it sets out:

- Vision and aspirations for the site
- Baseline information
- Scenario testing
- Consultation stages/scheme refinement
- Implementation/management issues

The document outlines concepts and ideas but does not advance an understanding of the development opportunity to a stage that could be deemed equivalent to a supplementary planning document requiring clear policy-related outcomes. The document is not a 'masterplan' because it does not explain 'what/where/how'; it remains at a stage that might help to inform the formulation of a policy. This is not a criticism of the document, which merely reflects the uncertainties inherent in the 'emerging' policy. Further development and refinement of the policy is needed before there can be any reliance placed on ED12. To constitute a masterplan within the meaning ascribed by NPPG there clearly need to be further stages of development and refinement.

NPPG provides further assistance in determining the extent to which Policy W2 satisfies criteria relating to the achievement of good design outcomes: Non-strategic policies of this nature should be used to establish local/detailed design principles for an area, including design requirements for site specific allocations. Such policies are '*important for providing a clear indication of the types of development that will be allowed in an area, especially where they provide a hook for more detailed...masterplans*'. The NPPG elaborates, advising that masterplans should '*set the vision and implementation strategy for a development*'. They should focus on site specific proposals such as the scale and layout of development, and depending on the level of detail the masterplan may indicate the arrangement of buildings, streets, and the public realm. While masterplans can be prepared by developers to explain their vision for a site this is not a substitute for the local authority setting out design expectations clearly. The NPPG states that masterplans produced by local planning authorities may be adopted as SPD to give them weight in decisions on applications.

If this process is not followed it is unclear how a decision-maker would know what is required in design terms from the allocation.

If the masterplan process is to precede a planning application, which given the level of ambiguity that is inherent must be necessary, it is unclear how such a masterplan would be approved/adopted, unless the LPA anticipates preparing a supplementary planning document to be adopted before an application may be submitted. There is no suggestion within W2 that this is the case. In the alternative a masterplan would form part of a planning application process, the prosecution of such would in effect be formulating policy requirements through a process of negotiation associated with the application. It is hard to see how such an approach could be justified.

As drafted it is unclear how a developer would be expected to approach the site or how the LPA would be able to control development taking place on parts of the site that may, or may not be, suitable for development. If it is the intention that the policy should operate in this manner, it is very easy to anticipate that an application would be subject to a highly protracted and highly uncertain delivery process, which is unlikely to support an effective housing strategy.

**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?**

The policy wording answers this question succinctly; the ‘*working assumption*’ that is used to inform the nominal site capacity reveals that there is a lack of evidence to support an allocation of this significance. It is unclear whether the LPA is relying on the Concept Masterplan Vision Document (ED12 January 2025) to provide the substance to support the policy. If this is the case the document post-dates submission of the Local Plan for examination and has not therefore been subject to any public consultation associated with the plan-making process. It is hard to see how it could carry any weight in the decision-making process pursuant to the requirements of NPPG outlined above.

**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?**

The Settlement Gap Review<sup>3</sup> advises at paragraph 1.8 that the Littleton/Winchester settlement gap:

*“..has not been analysed in the Settlement Gap Review due to the ongoing masterplanning for the Sir John Moore Barracks allocations. This masterplanning 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.”*

The Introduction to the Review document describes how gaps function, why they are important, and how they will be assessed comprehensively to help inform the spatial strategy of the development plan. The relevant paragraphs are reproduced below, with relevant parts emboldened to highlight the incongruity of approach adopted regarding the W2 allocation:

*“1.2 In Winchester District the **preservation of open areas between built-up settlements is a well-established spatial planning tool. These gaps are valued by local communities for the role they play in safeguarding the visual separation and distinct identity of neighbouring settlements.***

*1.3 In maintaining openness between settlements, **gaps also help to conserve the open countryside role as an important amenity for recreation and biodiversity, but their primary focus is on spatial separation.** There are other policy tools targeted at other benefits provided by open land, including emerging Local Plan policies NE1 (Protecting and enhancing Biodiversity and the Natural Environment in the District), NE9 (Landscape Character), NE14 (Rural Character) and HE2 (All heritage assets - both designated and non-designated). Village Design Statements also identify valued characteristics of open land.*

*1.4 The need to review the settlement gaps defined in the current Local Plan was set out in the Local Plan Part 1 (2013), which indicated (at paragraph 9.48) that **“any detailed review of the boundaries of these gaps will be undertaken in future Local Plan Part 2 or a Neighbourhood Plan, in accordance with the principles contained in the PUSH Policy***

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<sup>3</sup> Settlement Gap Review – WCC – Final Report (LUC) July 2024

***Framework for Gaps.*** “The Local Plan Part 2 (2017) included a partial review of settlement gaps but **the Council are now at a stage to be able to undertake a more comprehensive review.**”

It is clear from this document that the Council has determined to allocate the SJMB site without considering the impact that such allocation would have on the integrity of the Winchester/Littleton settlement gap. The decision has been taken absent of any proper evaluation of the impact that such a decision would have on the operation of the settlement gap policy.

In undertaking an assessment of SHELAA sites around Winchester in support of submissions to the R.18 Draft Local Plan consultation in 2022 (October 2022) (**Appendix 1**) Nexus Planning considered the implications of developing land falling within the settlement gap, including the SJMB site (paragraphs 3.15-3.22 refer). The implications of the carried forward policy (NE7) were assessed with reference to the PUSH policy referred to in the LUC report, quoted above. The conclusion was that allocation of land within the gap for strategic scale development would contravene the terms of the policy.

While this does not necessarily preclude development of the SJMB site, the positive aspects of an allocation may be deemed to outweigh the disbenefits, the LPA appears to have proceeded without assessing the policy implications. It also does not appear to have concluded the assessment process that was indicated would take place prior to allocation (SD07a). The submissions made on behalf of Vistry and Taylor Wimpey to this effect at R.18 consultation stage, and similar comments submitted by other respondents, were noted with officers stating that the aim will be to maintain ‘some element of separation’ but that this cannot be undertaken until work on the SJMB masterplan has progressed. It is now apparent that the work was not undertaken prior to submission of the Local Plan for examination.

**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?**

Vistry and Taylor Wimpey have made clear elsewhere in submissions to the examination, and in previous sets of representations, that should the site be made available for redevelopment it would be an appropriate component of a new northern neighbourhood for Winchester, with access to the city centre via the Andover Road, which could function as an improved sustainable transport/active travel corridor through enhanced bus services/routeing and further cycle-route enhancements to supplement those within the LCWIP (ST03). Growth concentrated to the north of the city comprising Kings Barton, the land north of Wellhouse Lane, and SJMB could comprehensively address future sustainable growth requirements of the city and the district over successive future plan-periods, with the critical mass to offer real step-change and to satisfy the higher levels of growth that will be required to meet LHN (and other potential needs) in accordance with the 2024 NPPF. However, in the short-term there appear to be significant uncertainties associated with the capacity of the site and the masterplanning solutions that may be available to successfully manage the challenges associated with bringing the site forward.

In the context of this examination, which will consider only a short-term solution to development needs, there is significant uncertainty regarding the deliverability of the site. The LPA has opted to include the W2 site as the main defined newly identified component of its housing strategy for Winchester without the necessary evidence in place to fully justify the decision. It is therefore difficult to determine whether the right balance has been struck. Questions surrounding the capacity and deliverability of the site in the context of this examination suggest that the policy is unlikely to be effective.

## Appendix 1.