

## **Winchester Southern Parishes Response to the Winchester Regulation 19 Local Plan Consultation**

The Winchester Southern Parishes Group (WSPG) is the constituted collective voice of those Winchester District Parish Councils whose domains abut the Solent Urban Area, and so include the major development areas (MDAs) of Whiteley, North Whiteley and West of Waterlooville. It also takes in the market town of Bishops Waltham and some more rural areas of the Meon and Lower Itchen Valleys. This consultation response is therefore a joint and collective view of those Parish Councils.

**The WSPG believes that the Draft Plan contains policies designed to mitigate and arrest the effects of Climate Change effectively. The Strategic Transport Assessment (STA) commissioned as supporting evidence for the Draft Local Plan and submitted for Regulation 19 is, however, fundamentally flawed in that:**

- **these policies will fail to deliver effectively without a more robustly supportive STA;**
- **the STA fails to acknowledge the significant loss of public transport over the last Local Plan period and the impact of that loss, during a period of large-scale development in the WSPG area**
- **the STA fails to identify the positive action required by the Local Transport Authority (LTA) to identify and act on the opportunities presented by WCC's proposed delivery of new housing;**
- **the STA fails to identify proven, deliverable funding models to support necessary public transport infrastructure, given the failure of previous models to support large developments;**
- **the STA therefore fails to identify action required to develop a viable, integrated public transport network in support of new housing, to align growth and infrastructure as required by the NPPF;**
- **the STA is therefore unfit for purpose and places the soundness of the Draft Plan in question.**

The MDAs in particular present an opportunity to develop a more integrated transport system for the wider Portsmouth, Southampton and Winchester travel-to-work areas. The area benefits from a good rail network, but one that now depends on 'feeder' bus services to be an attractive alternative to car use.

The experience from the previous build-out of MDAs is, however, one of opportunity lost. As these areas fall outside the scope of Hampshire's Bus Service Improvement Plan (BSIP), which focusses on improving already commercially viable services, bus provision has been limited to a minimal service delivered at the cost of Developers' Section 106 contributions, and time limited. The LTA has made no effective attempt at developing these services, to tap into the latent demand for a reliable public transport alternative, well integrated with the existing bus and train networks, as national policy seeks to promote. It is extraordinary that developments such as West of Waterlooville and North Whiteley have been populated without consideration of any meaningful supporting public transport infrastructure. In the case of 'greater' Whiteley, a settlement of 10 000 homes has been allowed to develop without the support of an integrated public transport system.

### **Statement of Common Ground**

Winchester City Council (WCC) is reliant on Hampshire County Council as the Local Transport Authority for its strategic planning of public transport. WCC's methodology in identifying allocation areas to ensure a supply of new housing, commercial and employment use development is sound, as is its focus on measures to achieve carbon neutrality, mitigate the effects of climate change and, as far as is practicable, arrest its progress. It is also agreed that the LPA's ability to implement the modal shifts to more sustainable transport is largely limited to its laudable efforts to ensure that significant new developments are designed to encourage permeability and active transport. It is the role of HCC as the Local Transport Authority (LTA), not WCC, to engage with transport operators and facilitate the development of an integrated transport network to achieve these aims. However, this does not absolve WCC from the requirements of the NPPF, which requires WCC to produce a robust assessment of the current and future transport provision.

## Public Transport Provision in the Southern Parishes

Of the three spatial areas identified in the draft plan, Winchester City and the South Hampshire Urban Areas are well served by rail services, both radial from London and the local inter – and intra-urban networks. The City and the neighbouring employment centres of Portsmouth and Southampton both have effective, widely-penetrating and predominantly commercially-run bus networks. As the Solent conurbation developed through the 20<sup>th</sup> Century, new housing largely developed linearly along these already established public transport corridors.

From the turn of the century, major development areas have had to be identified beyond these corridors to deliver the required supply of housing, together with expansion of markets towns, which traditionally acted as service centres to a relatively small catchment, as commuter dormitories. By contrast to earlier development, the area north of the M27 was never well served by frequent public transport. Given that the bus routes in this area were largely developed a century ago to serve a far more limited requirement, there is no firm, commercial foundation on which to build a modern integrated network.

HCC's own Local Transport Plan 4, issued in February 2024, also noted the following:

*"We need to cater for an ageing population. Ensuring safe access to amenities is vital for keeping older people physically and socially active. A lack of choice of quality public transport provision is contributing to loneliness, social exclusion and deprivation, especially in rural areas."*<sup>1</sup>

Bishops Waltham, the main market town in the Southern Parishes, has seen significant development in the current local plan period. Over the same period the bus offer in the town has significantly reduced. Historically, the town was served by hourly buses to Southampton, Winchester and Fareham, with a two-hourly service to Petersfield. In recent years this network has shrunk to a core hourly service on Stagecoach service 69 from Fareham to Winchester. In 2017, there were 53 weekday departures from Bishops Waltham Square. In 2024, there are 35 departures. The journey time to Winchester, at 53 minutes, does not make this a viable commuting or shopping link. It takes a circuitous route to serve other communities that have also seen service reductions; but in providing this notional service to a range of off-route communities the attraction of the basic service is greatly diminished. The link to Southampton and Petersfield has been completely lost, together with any pretence at integrating bus and train networks. Winchester Southern Parishes are included in the Southampton Travel to Work Area as defined by the ONS, but the STA does not assess the travel requirements associated with this. Botley station is now only served by a sporadic school-driven service and bus timings are not optimised to connect with trains.

## Failure to Deliver Sustainable Public Transport Provision via S106 Agreements

Newlands, part of the MDA west of Waterlooville, was originally served by diversion of a service from Hambledon and Denmead that continued via Waterlooville and Queen Alexandra Hospital, Cosham before going on to Portsmouth. This vanished when an S106 trigger point was reached to be replaced by the D1 and D2 services from Denmead and Hambledon respectively, with a combined hourly daytime frequency, that go no further than Waterlooville. In Whiteley, an irregular service of 6 weekday journeys serves Swanwick station before travelling on to Fareham, with only 3 journeys on Saturdays. There is no link to Botley station (for services to Winchester and London) nor is there any effective provision to Queen Alexandra, the local district hospital. As yet there is no bus provision in North Whiteley.

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<sup>1</sup> Page 47, Hampshire County Council Local Transport Plan 4, February 2024 at <https://documents.hants.gov.uk/transport/hampshire-local-transport-plan-4-2024.pdf>, accessed 11 October 2024.

## The Guidance and Requirements which the STA Fails to Meet

For the STA to be fit for purpose it must adhere to the Ministry for Housing, Communities and Local Government guidance for such supporting documents in Local Plan development. Specifically it should:

*“assess the opportunities to support a pattern of development that, where reasonable to do so, facilitates the use of sustainable modes of transport”,<sup>2</sup>*

and address

*“the locations of proposed land allocations and areas/corridors of development and potential options for the provision of sustainable transport and transport networks to serve them”, and*

*“solutions to support a pattern of development that, where reasonable to do so, facilitates the use of sustainable modes of transport”.<sup>3</sup>*

The guidance is clear that one of the primary roles of an STA is to identify the opportunities presented by new development site allocations to improve the overall public transport network and encourage modal change from the private car. The authors of the document supporting the Plan have entirely failed in their responsibility in this respect, whilst WCC declines to recognise, and demand rectification of, this failure. By doing so, the fulfilment of the Plan’s policy SP2, itself supportive of the County’s and South Downs National Park’s wider climate emergency policies, is made near impossible through lack of any meaningful support from the Transport Authority.

WSPG’s collective view is that the STA should provide the opportunity to recognise these past shortcomings and, as central Government guidance requires, recognise the further opportunities presented by the Draft Local Plan allocations to identify where LTA effort and resources should be targeted to enable the modal shift from private to public transport that the climate emergency demands. The document presented in the supporting evidence of the Regulation 19 consultation falls very far short of satisfying this requirement. It takes as its starting point the severely flawed BSIP, which focuses solely on further strengthening already commercially viable services, whilst totally ignoring the potential for expansion of the network that the MDAs present.

## Conclusion

The STA submitted as supporting evidence for the Draft Local Plan Regulation 19 consultation fails to address the requirements for such assessments and therefore fails to support delivery of Policies SP2 and T1 in the draft Local Plan. It not enough for WCC to state that public transport will be considered at individual development plan stage. NPPF and WCC Plan Policy T1 clearly state that it will be considered ‘at every stage of the development’

The STA is therefore not fit for purpose and requires major revision to support the examination in public; without this, the draft Local Plan as issued for consultation, risks being judged unsound.

For and on behalf of the members of the

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13 October 2024

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<sup>2</sup> Para 2, Transport Evidence Bases in Plan Making and Decision Taking, published 13 March 2015, at <https://www.gov.uk/guidance/transport-evidence-bases-in-plan-making-and-decision-taking>, retrieved 7 October 2024.

<sup>3</sup> Ibid para 4.