

**The Heritage Centre**  
32 Upper Brook Street  
Winchester  
SO23 8DG  
01962 851664  
www.cityofwinchestertrust.co.uk

secretary@cityofwinchestertrust.co.uk

**Chairman: Keith Leaman**



## **Winchester District Regulation 18 draft Local Plan Consultation**

Response by the City of Winchester Trust  
December 2022

The following detailed comments on the policies and supporting text are informed by “A *Vision for Winchester*” produced by the City of Winchester Trust in 2018.

### **General comments on the presentation of the Local Plan**

The City Council’s broad priorities of addressing Climate Change, ensuring homes for all and good design are laudable, and it is to be congratulated on giving so much emphasis to these. The Trust also applauds its introduction of detailed viability assessments for sites where affordable housing is required to stop developers avoiding their obligations to provide these.

However there are problems. The local plan is an important statutory document which sets the framework for development for decades and so it should be as clear and easy to understand as possible. The draft plan is long and in too many places repetitive and ambiguous. Some policies are generic and read more as broad ambitions rather than clear guidelines against which planning applications are to be determined. This is particularly the case for smaller developments. Policy wording should be tightened where possible to provide clear guidance to those using the plan to influence how Winchester and the District develops.

The rest of this response concentrates on those areas in which the Trust has distinct policy objectives and has areas of expertise and where it believes amendments are required to some of the explanatory and introductory texts and some of the policies.

# **CARBON NEUTRALITY AND DESIGNING FOR LOW CARBON INFRASTRUCTURE**

## **Strategic policy CN1 - Mitigating and adapting to climate change**

### **Objections and comments**

The following should be added as a new paragraph:

“The sourcing, manufacture, transport and assembly of materials to produce new houses, should be taken into account when calculating carbon emissions and reducing the carbon footprint for the District.”

No data is offered on current emissions, and on how information is collected and calculated, in order to enable policies to be measured.

Policy CN1 is largely directed at and more appropriate for larger scale developments, but smaller ones including extensions (which are excluded by the policy) and single dwelling houses should be required to take into account those aspects of climate change considerations which are relevant to the size of such developments so either this policy needs amending or a new one added stating which aspects of climate change adaptation and mitigation should be included for smaller developments.

Given the emphasis in the plan on tackling the challenge of climate change, this chapter would be strengthened by the inclusion of a new policy requiring major developments to demonstrate when they will become carbon neutral. Local plans in preparation elsewhere are seeking to control the release of embedded carbon through demolition and redevelopment. See <https://beta.bathnes.gov.uk/local-plan-core-strategy-and-placemaking-plan-partial-update/whole-life-carbon-assessments-new>

# HIGH QUALITY WELL DESIGNED PLACES AND LIVING WELL

## Paragraphs 5.37-5.41 - Six stages in the Design Process

### Objections and comments

The Design Process suggests that the community is only involved at one stage but engagement with the community should be a continuous process so that a development is co-created at all stages. This needs to be referred to.

## Strategic Policy D1 - High quality, well designed and inclusive places

### Objections and comments

The aspirations in this policy and the design section of the Plan are excellent, but smaller urban and suburban developments require different design approaches than the more substantial (often greenfield) developments. This is not sufficiently recognised in the 'six stages of the design process'; nor in this and other policies in the Plan which tend to be most relevant to larger scale developments. Many of the provisions are therefore not appropriate for smaller developments and the Trust suggests a separate policy or policies are needed for these.

For greenfield/larger sites:

The Plan's design aspirations could be difficult to enforce, as it is large developers that are likely to be promoting development on these larger sites. They will have significant power while lacking design ability and are unlikely to employ a good designer. The Trust therefore proposes the following additional policy or paragraph to reduce the scope for a developer to avoid the design aspirations as much as possible and stop the unsatisfactory pattern of 20<sup>th</sup> and 21<sup>st</sup> century developments, providing featureless, monotonous car dominated suburbs:

"An applicant will be expected to set out how it is intended to create a visual vocabulary using a network of landmarks, each of which acts as a means of recognition and navigation around the proposed development. It is expected that new developments should be laid out in such a way that they provide a central nucleus with the necessary authority and scale. Radiating out from the core, distinctive zones should be designed in order to provide a variety of human experiences, enhancing navigation as well as providing the basis for forming a community."

The Trust has been advised that this and other design policies are going to be difficult for practitioners such as planning officers to apply. Although we are conscious this may have been considered when the table on pages 537 to 540 of the Plan was compiled setting out which policies are replacing the policies in the existing plan, it is worrying to hear about this concern.

The policies in the current adopted Plan are more precise. For example, they cover the design of service areas, cycles and bin stores and boundary treatments among others. The existing policies that contain the details and guide practitioners are: CP13, DM16, DM17. The lack of precision in the Regulation 18 draft creates a Local Plan that is not user friendly, easy to read or concise.

Comments on specific paragraphs in Strategic Policy D1:

Paragraph iii:

The policy excludes householder applications but some of the provisions of this policy are relevant to these. There is no reason why most household applications should exclude good contextual and sustainable design. Either this should be amended, or a new policy included for householder applications covering the relevant issues.

Paragraph vii:

There is more to achieving a good landscape framework and a stimulating sensory environment than just providing ‘seating along longer pedestrian routes’. We recommend that this paragraph be expanded to include other public realm improvements such as hard and soft landscaping and a full range of appropriate street furniture. Alternatively a manual or guide for landscaping which has sufficient status to be generally acceptable could be referred to.

## **Paragraphs 5.42-5.64 – Design issues across the District and Development in Winchester Town and surroundings**

### **Objections and comments**

This section includes a record of the useful discussions and sketches that were tabled at the Winchester Design Workshop and which should be useful for future development in the opportunity areas. They should either be followed by a policy that refers to the improvements (called ‘opportunities’ in paragraphs 5.42 – 5.64) that should be considered when any of the opportunity areas are proposed for development or be removed and added as an appendix and be part of the evidence base for use in the future. The outputs from the Design Workshop should be helpful if it is decided to produce a more detailed city -wide plan in the future.

## **Strategic Policy D2 – Design Principles for Winchester Town**

### **Objections and comments**

Paragraph ii:

The Trust has for some years been promoting the need for a more detailed city-wide spatial plan and understands that the City Council believes this paragraph will enable this to be produced in the future. To make this clearer the Trust believes it should either be amended or an additional paragraph added that includes the possibility of producing other planning documents than those referred to, which could include a citywide plan (ie a citywide urban design framework). The text should make it clear that any additional documents should undergo engagement with the community and stakeholders and with statutory/non-statutory consultees and be subsequently adopted as a planning document.

Paragraph iv:

Amend the first part where words seem to be missing to read:

“How the distinct character of the local area has informed the proposed development and how the design will respond to and reinforce .....

Paragraph v:

Include reference to street frontages (as well as roofscapes) and refer to streetscapes.

Paragraph vi:

Delete the existing wording. We suggest the following is more comprehensive and explicit in indicating what the expectations are:

“Opportunities are explored through the design process to address the priorities of the adopted Winchester Movement Strategy to improve strategic and local connections, improve the quality of the public realm, create a better environment for pedestrians and cyclists and, in highly sustainable city locations, encourage the reduction in the number of residential and commercial employee car parking spaces. In the city centre it will be expected that parking provision will not be provided in any development unless a need for this can be justified.”

Paragraph (vii):

The phrase at the end “more use of the high street” needs to indicate what sort of uses are contemplated. Policy WT1 from the adopted Plan includes specific reference to the promotion of the town centre as the preferred location for new development that attracts high numbers of visitors; provision of open space in conjunction with development; retention of existing open space and recreation provision.

## **Strategic Policy D5 – Masterplan**

### **Objections and comments**

The heading at the top of the page “MARKET TOWNS AND RURAL VILLAGES” should be deleted. This policy should apply to the whole district and masterplans will predominantly be within Winchester.

The Policy is too narrow in suggesting when masterplans will be required. It limits them to larger sites developed in phases and sites occupied by major landowners and users. Other significant sites that do not fall into these categories have in the past required masterplans; an example is the laundry site on Gordon Road (now Valentine’s Close) which won a design award.

The Trust believes masterplans on two of the sites allocated for development in Winchester are required but are not included; these are St Peter’s Car Park and the Central Winchester Regeneration area.

Second Paragraph:

We suggest this be reworded as follows:

After “stakeholders” add: “, the community”

After “local planning authority” add: “prior to the submission of a planning application”

Third paragraph:

We suggest this be reworded as follows:

“Masterplans should include the following and demonstrate through the submission of an accompanying contextual site analysis and urban design statement that high design standards will be achieved. Masterplans will be expected to:”

Paragraph i:

We suggest this be reworded as follows:

“Be accompanied by an urban design framework, an indicative development layout, a phasing and implementation plan and a public realm strategy;”

## **Policy D7 – Development Standards**

### **Objections and comments**

Our objection to this policy is similar to one of our objections to Strategic Policy D1 above. This policy replaces policies DM16 and DM17 of the LPP2 2017. Policy D7 is wordy and complicated, especially for non-professional members of the public. It fails to include basic Development Management policies, especially for more small-scale householder development as discussed above. This could be another reason for including policies specifically for householder and other smaller developments.

# **SUSTAINABLE TRANSPORT AND ACTIVE TRAVEL**

## **Strategic Policy T1 - Promoting Sustainable and Active Travel**

### **Objections and comments**

This policy refers to “the concept of 15 minute neighbourhoods”. This is relatively new and the Trust questions whether the Glossary gives an adequate explanation of the implications of this for new developments. The inclusion of both cyclists and pedestrians creates uncertainty as one can travel much further than the other in that time. Greater clarity is needed.

The Policy requires the incorporation of sustainable and active travel routes. To ensure the design and layout are of a good standard, guidance should be included indicating what would be approved, such as Transport for London’s 2020 Planning for Walking Toolkit and the cycle infrastructure design note LTN 1/20 published by the government in 2020.

## **Strategic Policy T2 - Parking for New Developments**

### **Objections and comments**

#### Paragraph ii:

This refers to the amount of parking provided and the factors to be taken into account which are general in nature and so may not lead to a reduction in parking spaces as expected. Current practice in new developments tends to provide generous amounts of car parking and more parking spaces can encourage more car use. Fewer parking spaces are more likely to be part of new developments if guidance is given on the number of spaces likely to be acceptable per dwelling in developments outside town centres.

#### Paragraph iii:

This refers to developments where no parking is provided, such as in town centres, but given the current pressure to provide parking, the wording should be more directive. Instead of using the word “supported” it should be made more definite by using the words “encouraged” or “expected” for example, and any parking proposed on such sites should have to be justified by the developer.

The meaning of the phrase “will not be to the detriment of the surrounding area” is not clear and needs to be redrafted.

#### Paragraph v:

Greater clarity is needed as to the factors to be taken into account in assessing the need for commercial parking. Clearly there is a need for parking for service vehicles.

## **Policy T3 - Promoting sustainable travel modes of transport and the design and layout of parking for new developments**

### **Objections and comments**

There is no reference to car parking being designed so it does not dominate public spaces and we suggest this be included in Paragraph iii.

## **Policy T4 - Access for New Developments**

### **Objections and comments**

In larger developments where shops and other facilities are being provided or where existing facilities are accessible by active travel, the policy should include active travel routes to both of these.



## **BIODIVERSITY AND THE NATURAL ENVIRONMENT**

### **Policy NE7 - Settlement Gaps**

#### **Objections and comments**

The Trust has for some time wished to protect the landscape setting of Winchester and has set out its reasons and proposals for this in a new policy on page 22 of this response. However, if this is not accepted then a lesser alternative would be the creation of a new settlement gap as follows:

The Trust objects to the omission of a settlement gap between Winchester/Olivers Battery and Hursley.

The countryside to the east of Winchester is protected by the South Downs National Park. The area to the north, by the Winchester – Littleton and Winchester- King’s Worthy settlement gaps. The countryside to the west is, to some extent characterized by country parks and the undulating downland including a golf club. However, the land to the south which is the subject of intense development pressure appears vulnerable and should be protected by a new settlement gap.

## **THE HISTORIC ENVIRONMENT**

The Trust supports all the recommendations in the Historic Environment chapter of the Integrated Impact Assessment published in October 2022.

### **Policy HE2 - All heritage assets (both designated and non-designated)**

#### **Objections and comments**

The Trust supports the requirement that all applications require a Heritage Statement except householder applications where this can be incorporated into the Design and Access Statement.

The Trust objects to weaker wording, compared to policy DM 29 of the adopted Local Plan, from: “loss only allowed exceptionally” to “Heritage assets should be conserved in a manner appropriate to their significance” especially as responsibility for defining the significance is delegated to the applicant. If Policy HE2 goes forward it should include the relevant wording from the NPPF.

### **Policy HE4 - Non-designated heritage assets**

#### **Objections and comments**

The Trust welcomes the inclusion in paragraph 8.5 of a local list as a way of identifying non-designated heritage assets. For some years we have urged WCC to produce a local list of heritage assets (City of Winchester Trust’s 2018 *A Vision for Winchester - Vision 9. A local list of buildings of architectural and/or historic merit is compiled*). However, so far this has not happened. The existing Local Plan acknowledges in Policy DM31 in LPP2 that a list could be prepared in the future, and the Trust would like to see similar wording included as part of this policy as it keeps the aspiration of a local list alive. A list would raise the visibility of such buildings and so give a greater level of protection to significant unlisted buildings outside conservation areas which might otherwise be lost as has happened recently in Winchester.

### **Policy HE8 - Applications affecting listed buildings**

#### **Objections and comments**

The Trust requests that if Policy HE8 delegates justification of any harm via Policy HE3 to the NPPF, it should include the relevant wording from the NPPF.

### **Policy HE10 - Development in Conservation Areas**

#### **Objections and comments**

The Trust supports the additional clause in policy HE10 (compared to Policy DM 27 in the current Local Plan) relating to sustainable energy by cross referring to new policy HE14. The Trust considers that if Policy HE10 is to delegate to the NPPF the assessment of harm to historic assets (“any harm to building clearly outweighed by public benefits as set out in HE3 and HE4”) then it should include the relevant wording from the NPPF.

## **Policy HE11 - Demolition in Conservation Areas**

### **Objections and comments**

The Trust objects to the apparent weakening from Policy DM 28 of the adopted plan, which states: “where demolition would enhance the ... Conservation Area” to the wording in this policy which states that planning permission will only be granted: “Where it can be demonstrated the condition of the building is such that its re-use would result in the need for extensive reconstruction to the extent that its historic interest and integrity (and thereby the positive contribution it makes to the Conservation Area) would be lost” and “unless demolition would result without a replacement that is acceptable in planning terms...”. The wording in the adopted plan should be retained.

The Trust supports the requirement that: “Planning permission will be conditional on a contract being let prior to any demolition work being undertaken.”

## **Policy HE13 - Non-designated historic rural and industrial heritage assets**

### **Objections and comments**

#### Paragraph iii:

The Trust objects to the omission of an explanation as to how viability will be determined (“If the existing use of the building that forms part of its significance is not viable, residential use should be clearly and convincingly justified”) in contrast to the loss of an employment use in paragraph 10.101 of the Creating a Vibrant Economy section.

## **HE14 - Improvements or alterations to improve the energy efficiency of designated and non-designated historic assets**

### **Support**

The Trust supports Policy HE14 as a sensible connection between the need for more energy efficient infrastructure and the need to protect the historic environment.

# HOMES FOR ALL

## Strategic Policy H1 – Housing Provision

### Objections and comments

The City Council has acknowledged there are significant uncertainties surrounding the calculation of the District's housing numbers and has therefore introduced a 10% buffer. This seems mainly because of other neighbouring local authorities in South Hampshire not being able to meet their housing needs as calculated by the Standard Method. Although the work on this has not been completed, other neighbouring authorities including Winchester may be asked to accept extra housing under the duty to co-operate.

It now seems that the Government is going to revise its directions to local planning authorities on the way housing numbers are calculated for each authority. This could be by changes to the factors that produce the Standard Method of calculating housing numbers and/or wider more flexible discretion given to local authorities in changing them because of local factors.

The Standard Method has been criticised, among other reasons, for basing its calculations on 2014 projections of population growth and not taking into account the more up to date information such as in the 2021 Census where the rate of population increase is now predicted to be lower. This could lead to changes in district housing numbers.

Until it is clear what revisions are made to government guidance and what the consequences are, the Trust believes and asks that the Local Plan Process should be paused.

## Policy H9 - Purpose Built Student Accommodation (PBSA)

### Objections and comments

The universities make a positive contribution to Winchester – culturally, economically and in terms of prestige and character. However, the potential impact from such a financially-competitive sector as PBSA on a town of Winchester's small size and sensitivity, where a delicate balance needs to be maintained among competing demands, must be carefully managed.

Winchester therefore needs a clear policy framework to limit PBSA to clearly defined areas. The Trust considers Policy H9 is too permissive in that the requirement that student accommodation be within easy walking distance of university facilities is too wide given that it is already spread across the city (from Winnall to Romsey Road), and all the centre of Winchester is walkable by the able-bodied. This policy therefore needs to be re-drafted to state that:

- any applications for additional university facilities or accommodation should be determined against an approved masterplan for each institution in order to fully demonstrate where, when and how development can be successfully accommodated within an overall context. Until masterplans are approved, PBSA should be on a university campus, adjacent to a campus or possibly in the area of Station Approach or the Central Winchester Regeneration area

- Through a legal agreement with the LPA and implemented at first occupation, which restricts occupation to fulltime students enrolled on courses of one academic year or more;
- On-site parking will be restricted to disabled, service and operational parking and is managed to ensure no student parking onsite.

# CREATING A VIBRANT ECONOMY

## Objections and comments

### Ambiguities in the text

#### Retail studies

Paragraph 10.77 regarding the timing of the retail studies is ambiguous. The text states “This will therefore also be undertaken as part of the review of the plan in 5 years time.” Presumably this means 5 years from the adoption of the plan rather than 5 years from now, but this should be clarified. Further, how does this 5 year review relate to the review of employment policies based on the new retail and employment studies?

#### Employment allocations

The Trust is concerned about the apparent ambiguity over which are new employment allocations and which are sites where employment will/may be permitted. For example:

- Paragraphs 10.24 and 10.38 refer to more than one allocation but the Employment Land Review identifies a need for 20ha. of employment land which policy W5 implies will be entirely met at Bushfield Camp.
- Paragraph 10.43: are CWR and Station Approach “employment allocations” or areas where additional employment floorspace will be provided? Ideally it would be helpful for the Local Plan to indicate, very broadly, how much additional employment floorspace is anticipated on these key sites as the Central Winchester Regeneration SPD (page 46) does in relation to residential, retail and mixed uses.

#### Residential use and Central Winchester Regeneration (CWR)

The Trust objects to the inclusion of the word “exceptional” in paragraph 10.59 because it renders the Local Plan ambiguous/inconsistent about the role of residential development on key regeneration sites. For example:

- Paragraph 10.43 refers to Policy W7 which states that CWR will provide “an appropriate mix of uses ... including retail, residential and leisure....”
- Paragraph 10.59 says “Exceptionally residential development may be considered as part of large-scale regeneration schemes such as within the CWR.”
- Paragraph 10.110 states: “residential development can play a useful supporting role in supporting centres but is not a main town centre use.”

The Trust prefers the wording used in Policy W7 iii.

## Strategic Policy E2 - Spatial distribution of economic growth

### Objections and comments

Bar End industrial estate should be included as a site where some employment should be retained/included.

## **Strategic Policy E4 - Retail & main town centre uses**

### **Objections and comments**

#### **Ambiguities in the text**

The Trust feels the use of the word “capacity” in paragraph 10.75 is ambiguous. Does this mean projected need (for additional comparison goods retail)? In addition, is the Local Plan providing for the lower of the two projections ie 1,852 sqm by 2036 rather than 2,961 sqm by 2029?

The Trust feels the use of two different floorspace threshold figures is confusing and requests that one is used consistently: Strategic Policy E4 requires application of the sequential test for retail applications outside the town centre if they exceed 350 sqm; paragraph 10.85 allows similar uses if they serve the locality if they are only up to 278 sqm. As these two policies (one restricting, one allowing) are mirror images it would seem sensible to use the same floorspace threshold.

## **Strategic Policy E6 - Retaining employment opportunities**

### **Objections and comments**

The Local Plan emphasises the need to protect existing employment land and premises, rather than allocating new sites. Paragraph 10.95 refers to adequately protecting employment land in order to support the economy and do without further employment allocations etc.

The Trust objects to Policy E6 because it does not adequately protect employment land and considers that it should be strengthened and clarified if it is to retain employment opportunities.

Within the policy, the clause “the potential of the site...to be developed for a mixture of uses, that include an element of employment” is too permissive as it encourages intensification on an industrial estate for non-employment use so long as it includes “an element”. This implies this could be only a token element.

The Trust feels paragraph 10.97 is unclear in its intention and considers it should be re-drafted. For example:

- There is an apparent double negative: “may not also not be appropriate”;
- What does “unnecessary” increases in travel mean?
- Why does the text imply that applications for hospitals, educational establishments etc on employment land will be judged differently to those for retail and residential?

## **DEVELOPMENT ALLOCATIONS WINCHESTER**

In the introductory paragraphs to the Winchester Site Allocations section the following additional paragraph should be added:

“The following pages refer to specific Winchester site allocations. It should be understood that any development within these allocations will also be expected to consider/comply with other relevant parts of the Local Plan, both in terms of the supporting text and the specific Policies.”

### **Policy W1 - Barton Farm Major Development Area**

#### **Objections and comments**

This is an existing allocation of 2,000 dwellings. 320 dwellings were completed as at April 2021. Proposals include the diversion of Andover Road through the development. A housing allocation for Sir John Moore Barracks for 750-1000 dwellings to the north of Barton Farm has now been proposed. The diversion of Andover Road remains a controversial issue and should be reviewed to take account of the Sir John Moore Barracks allocation. The Trust suggests this is done in the context of the wider aims of the Winchester Movement Strategy and takes account of the ambitions to move to a low carbon way of travelling.

The Trust has always advocated that the Barton Farm MDA should be built out at a higher density and would support the Council in any decision to increase the current planned densities.

### **Policy W2 - Sir John Moore Barracks**

#### **Objections and comments**

As stated in paragraphs 12.22 and 12.23, a masterplan for the development of this site has yet to be prepared and the buildings and structures on this site built in the 1980s are predominantly for military training use. A masterplan should explore the opportunities for giving these buildings new uses and comply with Policy D1 – development proposals should consider the role of embodied carbon as part of the design process to reuse/refurbish existing buildings.

The Local Plan should be proactive by identifying existing needs and opportunities that could be accommodated on this site such as:

- a. Relocating the TA building in Newburgh Street to assist the regeneration of the Station Approach Area
- b. Employment uses
- c. Expansion needs of the University of Winchester
- d. The impact of development on traffic flows on Andover Road



## **Policy W3 - St Peter's Car Park**

### **Objections and comments**

The Trust supports this site allocation and its accompanying Policy W3. If the outcome of the Movement Strategy is to make North Walls a two way road, this site needs to accommodate a bus layby for eastbound routes to complement the existing layby on the north side of Holy Trinity Church, for use by westbound routes. A masterplan would help to deliver a satisfactory development on this irregularly shaped site.

## **Policy W4 - Land west of Courtney Road**

### **Objections and comments**

The Trust objects to this site allocation for the following reasons:

- Paragraph 3.1 states “Winchester and its setting are of exceptional quality”.
- Policy SP3 states that in the countryside, defined as land outside the settlement boundaries, the Local Planning Authority will only permit the following types of development: v.) residential accommodation for which an exceptional need has been demonstrated. No such need has been demonstrated.
- Development would diminish the value of the gap and the value of the landscape comprising the allotments in Park Road to the south and Barton Farm Nature Reserve to the north. It would diminish the attractiveness of the well use footpath between Barton Farm and Worthy Road (12.11 Barton Farm allocation).
- The preface to the Local Plan states an aspiration to develop brownfield land first. This is not a brownfield site. It is used for arable agriculture. It is in the Local Gap – Winchester – Kings Worthy/Headbourne Worthy (Policy NE7 v.). There are brownfield sites in the centre of Winchester which could be allocated for housing and should be considered before development outside the settlement boundaries.

For these reasons, allocation of this site is not suited for development (12.33).

## **Policy W5 - Bushfield Camp employment allocation**

### **Objections and comments**

The site plan is misleading both in colour (green) and area. It implies that 43ha is a site allocation for development. The site plan should only show a 20ha site.

The rationale for this allocation is weak. Whilst the policy mentions 20 hectares of employment it does not give either a floorspace or the business use classes that would be permissible. The policy wording is concerned to protect the town centre and mitigate the impact of development on an environmentally very sensitive site. The policy states that the allocation “is to meet future, currently unidentified needs.”

The requirement for 20ha of employment land is referred to in the 2021 Stantec Report. It defines employment land at Bushfield Camp as Classes B1c (light industry), B2 (manufacturing) and B8 (storage and distribution). Paragraph 4.109 of Stantec notes that the allocation “was initially earmarked to deliver some form of office space but demand for office space is better suited in the town.” It mentions “R&D” and “hi-tech” uses without being specific about use classes. The Stantec requirement is district-wide, so could for

example be accommodated in major growth areas where employment and labour supply are increasing, including west of Waterlooville and Whitely.

Given the location of Bushfield Camp outside the town, and close to J11 of the M3, it is likely that an allocation of employment land will attract investment and employment from outside Winchester, rather than contributing to the town itself. Winchester's existing and proposed allocations of employment land offer sufficient opportunities for existing and new businesses to develop within the town.

In 2013 the Inspector for the Examination in Public into the last Local Plan recommended that this 20ha 'opportunity site' identified by the Council, should be allocated for employment use without evidence for the need.

The Bushfield site is part of the landscape setting for the City. It is recognised by the City Council as an area of great landscape sensitivity. It adjoins the South Downs National Park. It is within the Local gap between Winchester and Compton. It is largely covered by a Site of Importance for Nature Conservation and is a site detached from the urban edge of the City. Allocation of this site would be contrary to Policy SP3 (iii). The skeletal remains of the army camp cannot be regarded as "existing buildings" and a strong case can be made for it falling outside the definition of previously developed land.

The Trust argued that the Inspector's recommendation should not be adopted by the Council.

In 2018 the owners, the Church Commissioners, instructed Deloitte Real Estate to undertake engagement with stakeholders in relation to the land at Bushfield Camp. Following this exercise nothing has transpired until October this year when another public consultation was launched by Legal and General and Gisborne with a view to some form of development taking place. In spite of this, the Trust maintains its objection to the development of this site.

The land should be subject to a landscape management plan that links it to Bushfield Down to the north and could be made available for public recreational use.

## **Policy W6 - Winnall employment allocation**

### **Objections and comments**

It is important to protect employment sites so Policy W6 should be clearer and stronger. Therefore the criteria allowing non B use class employment for sub areas 2 and 3 should be consistent with those for sub area 1, namely: "...there is a presumption in favour of the retention of existing B use class employment and the creation of additional B2 and B8 floorspace to ensure Winnall continues as a centre for more traditional employment opportunities."

There is scope for "start up businesses" referred to for sub area 3 and for "B uses outside B2 and B8", referred to for sub area 3 within National Planning legislation and on their merits, through the planning process.

## **Policy W7 - Central Winchester Regeneration mixed use allocation**

### **Objections and comments**

The site plan should be annotated to explain the areas in green and brown. The allocation confirms that planning applications should demonstrate compliance with the Supplementary Planning Document adopted in June 2018. It makes no reference to the need to prepare a masterplan, which the Trust believes is essential, or to comply with the content of the Movement Strategy and arrangements for buses and a bus hub/bus station in the city centre. Progressing the Movement Strategy becomes increasingly urgent.

The Local Plan should advocate the creation of new public buildings, or conversion of existing buildings, such as Woolstaplers Hall, that will attract visitors, for example a Museum for the English Language, that has been promoted for a number of years. The CWR SPD refers at paragraph 3.7.12: "The Woolstaplers Hall could support...a larger cultural or heritage venue." This is included in the Trust's 2018 A vision for Winchester (vision 13 - A new museum is built that displays the role of Winchester in English Anglo Saxon history and development of the English language).

## **Policy W8 - Station Approach Regeneration Area mixed use allocation**

### **Objections and comments on background text**

The Site Plan and wider context plan should be extended to include:

- Cromwell House, and the rear car parking area to its south, as this has potential for development
- The Coach Station site to the north of the Cattle Market as this has potential to be developed for a 'park and walk' site
- The public realm including Upper High Street as this will be a major pedestrian route and cycle route from the station to the Westgate and thereon to the city centre.

The Trust objects to the omission of the importance of achieving the Priorities of the Winchester Movement Strategy, given the degree of traffic and congestion in the surrounding streets.

Within the explanatory text, there should be acknowledgement of the adopted Winchester Movement Strategy and its priorities and how, by significantly reducing the amount of car parking serving new development in this highly sustainable city location, will help to achieve Priority 1 of the strategy "Reduce City Centre Traffic" and Priority 2 "Support Healthier Lifestyles". This is particularly important given the high volume of vehicles that currently pass through and park within the regeneration area and the current degree of vehicle congestion. The sheer number of vehicles and vehicle paraphernalia (ie signs, white lines, barriers, etc) and large areas of tarmac have degraded the area and have devalued the character of the conservation area.

We recommend the addition of the following paragraphs after 12.61:

"In this highly sustainable location where there is good access to public transport and potentially good pedestrian and cycle access to facilities and services, there are good opportunities to reduce the reliance on the private car. This will help to achieve

carbon neutrality which is a WCC priority and reduce the visual and physical and audible adverse effects that vehicles and vehicle paraphernalia cause in the area.

To reduce the number of cars on surrounding streets, in considering new proposals within the regeneration area, there is an opportunity to provide car-free residential development and car-free commercial development. This will be wholly in accord with the adopted Winchester Movement Strategy whose priorities are: ‘to reduce city centre traffic’, ‘support healthier lifestyles choices’ and ‘invest in infrastructure to support sustainable growth’.

“Therefore, in accessing new development within the Station Approach Regeneration Area, the local planning authority will prioritise the need rather than the demand for all new residential and employee on-site car parking.”

We recommend the following amendments for greater clarity and scope:

Paragraph 12.62

In the penultimate line after the first ‘and’ add ‘routes’

Paragraph 12.65

First para, penultimate line delete ‘reflect’ and add ‘respect’

Paragraph 12.66

First line delete ‘site’ and add ‘regeneration area’

Paragraph 12.70

Delete ‘setting of the building/site’ and insert ‘regeneration area’

Paragraph 12.71

Third line after ‘development’ add ‘and public realm’

Paragraph 12.72

Second bullet penultimate line after ‘in’ add ‘a’

Paragraph 12.74

Fifth bullet replace with:

- “Safeguard and enhance strategically important views from the public realm within and outside the city, safeguard views of the Cathedral and important landmark buildings, safeguard the character of the area and safeguard the setting of Winchester city.”

Add a new bullet after ‘public car parking’:

- “Private carparking serving residential, commercial and other uses, which should be kept to a minimum and only provided if there can be proved that there is a need”

Paragraph 12.75

At this early stage it is impossible to be accurate about the number of dwellings, but it is recognised that an indicative number is important in calculations to satisfy the District’s total housing requirement. The Trust suggests adding something like the following to try and achieve the full potential of sites compatible with good design: “higher density housing including private and affordable housing and housing for the elderly and student housing.”

**Objections and comments on text of Policy W8**

We recommend the following amendments:

Paragraph (i)

Third line delete ‘site’ and add ‘regeneration area’

Paragraph (ii)

Delete last word 'site' and add 'regeneration area'

Paragraph (iv)

Fifth line after 'to' add 'and from'

Sixth line after 'station,' add 'the city centre,'

Paragraphs (vi) and (vii)

These don't make much sense and at this stage it is impossible to state that a number of storeys are likely to be acceptable or not acceptable.

We therefore recommend that these two paragraphs are deleted and replaced with the following new paragraphs:

“(vi) The proposals have been assessed to determine the visual impact of development and its acceptability in views from the public realm within the city and in views from outside the city. Of particular relevance in the assessment will be the height and scale of new development, which must respect the height and scale of the surrounding buildings; its layout and articulation; the colour and textures of materials; that the development does not adversely impact on the continuity of the treed horizon; that the development respects the setting of historic features including the Cathedral and other city landmarks; and that the development does not compromise the landscaped setting of the city.

“(vii) The proposals have been assessed to determine the impact of development on existing residential properties (particularly, but not exclusively, Gladstone Street, Worthy Lane, Sussex Street and Andover Road), in terms of creating any adverse amenity matters which include overlooking, overshadowing, loss of light and being overbearing.”

Paragraph (ix)

Delete this paragraph and replace with:

“(ix) in order to enhance the experience of those using the public realm (particularly pedestrians) and provide more attractive streets and public spaces all proposals should provide active street frontages to buildings which will face the existing streets and open spaces and active frontages to proposed public spaces and routes within the development sites.”

Add a new paragraph (xi):

“Proposals should provide very limited on-site car parking for new residential development, new commercial development and other new uses, given the very sustainable location of the regeneration area and the need to reduce traffic to help to achieve carbon neutrality and reduce the physical and visual disbenefits. When assessing development proposals, the developer will be required to provide evidence that there is a need for on-site car parking, rather than a demand.”

## **Policy W9 - Bar End Depot mixed use allocation**

### **Objections and comments**

The site adjoins the Bar End Leisure Centre and the Winchester Athletics track to the east. The site offers the opportunity to consolidate this as an area for sport and recreation. The popular riverside camp site in River Park was displaced by the Indoor Bowls Club building in the 1980s. As part of a landscape masterplan to improve the function and

appearance of River Park, the Council should be proactive by allocating and moving the Indoor Bowls Club to this site.

## **Policy W10 - Former River Park Leisure Centre site: Learning and non-residential institutions allocation**

### **Objections and comments**

This allocation covers the site of the closed Leisure Centre, the Indoor Bowls Club and outdoor skate park.

A masterplan is proposed to be carried out in consultation with key stakeholders and interested parties. The key stakeholders are not explicitly identified. The Trust understands that the land ownership was transferred to the Council to be held in trust for the benefit of the public and a covenant is attached that requires the land to be used for recreational use. It is stated that the skate park should be retained and that residential use cannot be considered because the land is within a floodplain.

It is implied that the University of Southampton has an interest in an unspecified proposed building. No reference is made to the land acquired by the University on the site of the former police station in North Walls. This site should be included as part of this site allocation.

The implied proposal for some form of cultural building needs to be considered in relation to uses proposed for the Central Winchester Regeneration Area, that includes a cultural content.

The Indoor Bowls Club could be relocated, as we propose, to the Bar End Depot site.

As it stands the site allocation is based on circumspet information. Clarity is required on how this site can enhance North Walls Park as a recreation area, how it relates to the existing University holdings in Park Avenue and North Walls and how its use fits with the regeneration of the Central Area and the emerging walking and cycling strategy.

## **Policy W11 - University of Winchester/Royal Hampshire County Hospital: Learning and non-residential institutions allocation**

### **Objections and comments**

Does the reference to the Policies Map mean the map on page 326?

The interface between the University and the Hospital along Burma Road is a visual mess and reflects poorly on the two institutions.

This area is in need of a masterplan, the purpose of which would be to improve the function and appearance of the area. The terms of reference for a masterplan should be expanded to include an assessment of the future of Hilliers Garden Centre and the prison in Romsey Road and the options these sites offer to accommodate the expansion needs for both the University and the Hospital.

The plan refers to “testing infrastructure and service capacity to serve new development” in Policy SP2 clause x. However, it is silent on the notion of allocating a further 10,000 homes within the hospital catchment whilst acknowledging there will be a reduction in local health infrastructure presumably creating more car travel.

The Trust is concerned at the apparent reduction in local health provision in Winchester at the same time that the plan is identifying sites for 10,000 new homes.

### **The need for a new policy to protect the landscape setting of Winchester**

The Trust is concerned that policies in the draft Plan are not adequate to protect the important landscape setting of the City and strongly maintains that it should be protected. The Plan at Para.3.1 acknowledges this in stating that “Winchester and its setting are of exceptional quality”.

The Trust proposed at the Local Plan Inquiry in 2012 that a Green Belt (NPPF 2021 para. 138-146) should be designated on the north, west and south sides of the City, to link up with the South Downs National Park on the east side. The City Council in their response to the Inspector, said that no work had been undertaken on the issue of a Green Belt in the preparation of the Plan. The Inspector in his Report, p.139, said that a Green Belt ‘would partly prejudge complex decisions about the long term future of Winchester and that the Council is not in a position to realistically make at the present time’.

Planning is about both the protection and development of land. Since 2013 work has been undertaken on the issue of a Green Belt. The Partnership for South Hampshire Joint Committee, of which the City Council is a member, resolved at its meeting in December 2018 to support the idea of a South Hampshire Green Belt. No acknowledgement of this resolution is made in the draft Plan.

If it is maintained that existing countryside policies are robust to protect the landscape setting of Winchester, these policies failed to protect the setting from development at Pitt Manor Farm and the northern section of Barton Farm beyond the 65m contour line.

As policy stands, the Trust contends that if development were promoted on land at South Winchester Golf Club or ‘Royaldown’ between the City and Hursley, and a protection designation such as a Green Belt was not in place, it would be difficult for the Council to defend a refusal at an appeal if housing numbers required land to this extent. These sites are in the Hursley Scarplands, which with the Sparsholt Woodlands to the north, are two areas of valued landscape.

The Plan should state, or refer to supporting evidence, of the work that has been carried out by the Council and adjoining authorities to designate a Green Belt in South Hampshire. If a Green Belt is not pursued and it has been concluded that existing policies provide adequate protection of the landscape setting of the City to the north, west and south, then the Trust requests that the Royal Winchester Golf Club, South Hampshire Golf Club, Bushfield Down and Bushfield Camp be designated as Local Green Space (NPPF 2021 paragraphs 101-103).