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Winchester Local Plan 2036 Launch Consultation September 2018

Response from the City of Winchester Trust

Question 1.

***3 Spatial Areas: Winchester Town, South Hampshire Urban Areas and Market Towns and Rural Areas
Have the three spatial areas proved useful and are they still relevant. Should they be retained?***

Yes

Comments:

None

Question 2.

Should the amount of new development required be distributed in a similar way to that in the adopted local plans?

Yes, but subject to the following important qualifications:

Comments:

LPP1 and 2 emphasise the importance of Winchester's heritage, its compact character and landscape setting. All these are compromised and damaged progressively by more and more growth. So there has to be a limit to this and a careful assessment needs to be made to establish where those limits are.

The Trust has carefully examined the current boundaries of Winchester and is particularly concerned about the vulnerability of parts of the western and south western boundaries. Because of this we have proposed for some years a green belt designation adjacent to these boundaries. The Planning Inspector in his report on LPP1 in 2013 referred to the Trust's representation on the need for a green belt for Winchester but said it was not the right time for Winchester City Council to consider this proposal. Five years later the Trust maintains its call for such a designation to be considered.

The Trust has also considered other ways to provide protection to these boundaries and proposes that the local green space designation should be pursued. The Trust asks WCC to invite local communities to recommend suitable areas to be designated as local green spaces, particularly on these boundaries and perhaps more widely as encouraged by para 99 of the NPPF. By taking this approach, stronger protection could be achieved than the policy in LPP2 and in contrast to the reasoning in paragraph 6.2.19 in that

document. In progressing this designation, the analysis of the land on these boundaries contained in the Trust's document *Winchester City and its Setting 1998* would be helpful.

The Trust has seen a draft of the response by CPRE to this consultation about development of land at Vale Farm Pitt which is part of the area the Trust believes to be vulnerable. In opposing development here, CPRE has listed the characteristics and contributions the land makes which together satisfy the characteristics that make it part of a 'valued' landscape that should be protected (see NPPF para 170, 180 b and c). The Trust supports this view.

Question 3.

The Government requires local plans to be updated every 5 years. Do you agree with rolling forward the local plan by 5 years?

Yes, the Trust understands there is no discretion for an alternative approach.

Question 4.

Should the local plan allocate (if necessary) strategic sites even if they may not be fully developed by 2036?

This is a question that the Trust feels unable to give a 'yes' or 'no' answer to as there are a number of factors to take into account as set out below:

Comments

The Trust accepts responsible planning requires looking to the future over the plan period, taking into account what is required to create sustainable communities in a way that meets the needs of the area in an ordered and considered manner. So it could make sense to identify a potential reserve site in the District if properly prepared forecasts indicate one may become necessary towards the end of the plan period.

However, there are some interesting non-strategic policies in the new NPPF about development for housing and other uses which WCC should take fully into account when considering development in Winchester Town, before considering designating a strategic reserve site. This is supported by the revised NPPF in para 23 which accepts that needs may be met more appropriately through mechanisms such as brownfield registers or other non-strategic policies. These mechanisms include:

- a. Use of brownfield land through the updating/creation of a brownfield register (para 68 and 118)
- b. Identifying small and medium size sites (para 68)
- c. The section on 'Making effective use of Land' contains some interesting proposals that would, if used sensitively, deliver more development. The increased emphasis on achieving higher densities is supported by the Trust (We have been critical and remain critical of the low densities at Barton Farm). Without being too rigid, guide lines about densities would be helpful, particularly when coupled with requirements for good design and respect for the character of an area.
- d. There is reference (para 119) to facilitating land assembly when considering redevelopment and the Trust supports this. It is a useful tool in assisting densification. It should also lead to better designed buildings and avoid cramped development when infilling is being proposed.

The Trust believes the suggestion about the use of airspace above existing buildings has limited application in Winchester. It would need careful consideration. If there is potential for its use, clear criteria and design guidance should be given to ensure the character of an area is respected or improved.

Question 5.

Should there be one or more development plan documents?

It is difficult to give a 'yes' or 'no' answer to this.

Comment

Ideally it would be better to include all the policies in one document, but time and resources may not permit this. Clearly as a minimum all the strategic policies have to be included in the next local plan, but it may be that some of the other policies could be included in the new plan, some that do not require amending could be 'saved' from Local Plan Part 2 and some new ones which may take longer to produce will probably be required in further documents.

One local policy the Trust would like to see included in the new local plan concerns the policies and guidelines in the Central Winchester Supplementary Planning Document. Following the good public consultation process, the City Council without consultation and inadequate explanation made significant changes to the wording of the SPD which greatly weakened the force of its policies and could result in a developer ignoring what the SPD is intending to achieve. We would like to see the local plan including a policy which reinstates the original or similar wording that ensures the policies of the SPD have the force of a local plan policy.

Question 6.

Cross border strategic matters. Are there any cross-border issues that you consider particularly important that need to be reflected in the local plan?

Comment

The main cross border issue for Winchester is transport which by its nature affects a wider area, crossing local authority boundaries. The greater co-operation that can be achieved between the district councils, the County Council, bus companies and the relevant railway companies, the more likely an efficient and sustainable transport system can be achieved. An example of the unsatisfactory management of the railways is the manner in which they install additional car parking around stations which is not co-ordinated or integrated into the car parking arrangements in the neighbouring area.

The South Down National Park is the nearest local authority area to Winchester Town, so it is important there is co-ordination and co-operation between the City Council and the SDNP, particularly over the setting of Winchester the eastern part of which is within the National Park.

Question 7.

Winchester City Council has a new Council/Community Strategy which sets out 4 outcomes to be achieved across the District (economy, quality housing, improve health and happiness, quality of the environment). Are there any other broad matters the local plan should refer to?

Comment

The Trust has no other broad matters to suggest.

The reference to the District being a premier business location is not a term which appears in any planning documents so far as the Trust is aware. The Trust view of the appropriate range of businesses for Winchester Town is that expressed in Local Plans 1 and 2: higher education, creative and media and knowledge-based activities. The only addition we would like to see to this list is to include heritage related businesses. These would complement the heritage attractions of Winchester.

Questions 8 and 9

Local Plan part 2 Development Management Policies

Are there any issues that are not covered in the existing policies or are there any other comments?

Comments

a. Transport and parking

A transport policy for Winchester Town is needed to underpin the findings the Winchester Transport Strategy which we understand is likely to be published soon. The Trust has heard there is strong support from the public consultation for a reduction in traffic in central Winchester and a policy should include wording that supports this aspiration.

b. Include a policy about identifying small and medium size sites for housing and other uses and encouraging land assembly (para 119), referred to in our comments in answer to question 4.

c. Good design

The Trust is concerned there have been too many mediocre developments of late and without care this is likely to get worse, given the Government's drive to build houses quickly. It is therefore to be welcomed that the new NPPF includes more detail and emphasis about design than its predecessor (Section 12, pages 38-39). These should be embraced by revising and updating the design policy in LPP2 and the SPD for High Quality Places.

The challenge is to ensure that developers respond to the aspirations set out in policy and deliver development which responds to the context and character of Winchester, creating a sense of place. Developers often do not understand what is required so it is important that the City Council has appropriate general design expertise. Without it good townscape design will not be achieved in new developments and the character of Winchester Town and other settlements will degrade.

d. Airspace

The Trust referred to this innovation in the new NPPF in commenting on question 4. If the use of airspace is considered a suitable source for development, then a policy guiding this should be included, with the addition of safeguards setting out appropriate conditions that should be satisfied to ensure that the townscape character is respected.

e. Local green space

As referred to in comments on question 2, the City Council should have a policy encouraging local green spaces to be designated to achieve the protections the Trust wishes to see established on the boundaries of Winchester Town.

f. Trees and the natural environment

It has long been recognised that mature trees within and around the urban area are an important characteristic of Winchester Town and its setting, but the Trust is concerned that Policy DM24 does not provide adequate protection to the natural environment within Winchester Town.

Mature trees that have been lost have not been replaced. This is particularly the case in the public realm such as with trees in streets. The Trust has the impression that the County Council supports or acquiesces in a practice of not replacing street trees perhaps because they are a maintenance liability for the future. There should be a strong policy designed to resist the loss of street trees and

the County Council should be encouraged to be active in maintaining them and replace trees when lost.

Question 10.

Government guidance now requires local plan policies to be viable, taking into account evidence of infrastructure and other policy requirements (eg affordable housing provision etc). What in your experience are the main challenges in delivering or achieving them?

Comment

The Trust does not have the knowledge to comment on the particular question asked but we understand that the revisions to the process of assessing viability in para 57 and the updated Viability PPG now makes it more difficult for a developer to avoid providing the contributions to be made that are set out in the local plan. It places the responsibility on the applicant to show why a development is not going to be viable and that the price of land will not be a relevant justification for avoiding the provision of the contributions expected to be made as part of development.

Question 11.

Other Comments on the scope and content of the Local Plan 2036

a. Park and Ride

When drafting a traffic policy for Winchester consideration should be given to allocating land for more park and ride sites. The Trust considers that the proposal for the planned 200 car capacity site at the northern end of the Kings Barton development may be insufficient in providing for the cars entering Winchester from the north.

b. New sites around Winchester

The Local Plan should include policies for the redevelopment of the sites at River Park Leisure Centre and Sir John Moore Barracks at Flowerdown. The Trust sets out below its current thoughts on how these developments should be planned:

(i) River Park Leisure Centre site

While the Trust supports in principle the redevelopment of the River Park site for community and cultural uses, it is important that planning for this site is carried out in a way so that opportunities for the site are fully realised, with other possible uses considered. The City Council should undertake a thorough planning and urban design evaluation before any uses are decided, land is disposed of or proposals are put forward for the River Park site as has happened on other large sites and some smaller sites like the former laundry site nearby this site.

The Trust proposes this evaluation exercise should take the form of a master plan, which should include an urban design framework and set of design principles. There should be full public consultation during the process. The study area for the master plan should not be confined to the site but should include connections to the wider area including: the residential suburb of Hyde, Winnall Moors, north into the countryside and connections to the city centre with pedestrian and cycle connections via Park Avenue and Middle Brook Street and the crossing of North Walls.

(ii) Sir John Moore Barracks (Flowerdown):

In the period leading up to the disposal of this site by the MOD, the Trust believes the City Council should produce a master plan for the Sir John Moore Barracks site, which should include an urban design framework and a set of design principles.

The document should define appropriate uses, taking into account the medium and longer term strategic planning requirements and aspirations of the community of Winchester and the north part of the District. In preparing the master plan, the Council should take into account its distance from Winchester and the importance of securing sustainable transport links (including public transport, cycle lanes and pedestrian routes) to and from the site to Winchester City and other neighbouring settlements.

c. Citywide Urban Design Framework

The Trust has on a number of occasions expressed the view that Winchester Town would benefit from having a citywide urban design framework and we know a number of towns have produced these, the nearest being Southampton. It could be a supplementary design document or a more rigorous neighbourhood plan building on existing supplementary planning documents and frameworks. It would greatly assist decision makers and provide confidence and understanding for the community that decisions are being made in the knowledge of what the implications would be for the other parts of the Town and avoid decisions being made in isolation.