

1.0 Introduction

- 1.1 The following representations are made on behalf of Bovis Homes Ltd and Heron Land Developments who jointly control land to the north of Winchester.
- 1.2 These comments relate to the Schedule of Proposed Modifications to the Winchester District Local Plan Part 1 – Joint Core Strategy published in June 2012 and the National Planning Policy Framework.
- 1.3 In addition to the comments set out below, Heron Land Developments and Bovis Homes reiterate their comments made in response to previous consultation exercises in connection with the preparation of the Core Strategy.

2.0 National Planning Policy Framework (NPPF)

- 2.1 The NPPF was published in March 2012, some months after the publication of the pre-submission Winchester District Local Plan Part 1 – Joint Core Strategy. Its contents must be taken into account in the preparation of local plans (paragraph 2).
- 2.2 At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 14). For plan-making this means that local planning authorities should positively seek opportunities to meet the development needs of the area and Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change unless the adverse impacts of so doing would significantly and demonstrably outweigh the benefits.
- 2.3 The NPPF includes a set of core land-use planning principles that should underpin plan-making at paragraph 17. One of these principles is that planning should *'proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of the area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities'*.
- 2.4 For the reasons set out in representations on the pre-submission draft Local Plan, Bovis and Heron consider that the proposed housing requirement for Winchester Town is insufficient to meet the current levels of need and will do little to resolve issues associated with the current housing and economic imbalance or affordable housing shortage. The NPPF gives further credence to these arguments. Paragraph 2.17 of the pre-submission draft acknowledges that Winchester Town generates substantial housing and economic needs, albeit that it is noted that the City Council are intending to

delete this statement through the proposed modifications for reasons which are unclear.

- 2.5 The promotion of mixed-use development is another core land-use planning principle identified in the NPPF. Throughout the preparation of the current draft Local Plan, Bovis and Heron have consistently promoted the advantages of a comprehensively planned, mixed use development North of Winchester. Such an allocation would accord with the core principles set out in the NPPF, deliver sustainable development and provide the Plan with sufficient flexibility to adapt to changing circumstances.
- 2.6 In relation to economic development, the NPPF confirms at paragraph 21 that in drawing up Local Plans, local planning authorities should inter alia:
- *'set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;*
 - *set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period.'*
- 2.7 Policy WT1 of the draft Local Plan Part 1 fails to specify the amount of additional employment floorspace required over the plan period. The submission Plan does not include a strategic employment allocation despite the acknowledgement in paragraph 4.8 of Background Paper 4: Employment Land and Retail Study that *'The Council's evidence base identifies a number of challenges for Winchester Town, specifically the need to broaden and diversify the local economy to ensure that it is not over-reliant on the public sector; and the need to rebalance the economy in a way that begins to address the mismatch between in and out commuting.'* Paragraph 4.11 of the aforementioned document notes that the case for a knowledge based business park is more about generating job growth and changing the employment profile of the town, rather than providing space for projected demand. Policy WT3 (Bushfield Camp Opportunity Site) is therefore identified as being potentially capable of meeting a future need to diversify the town's economy, should the case be made for employment on this site and the policy requirements be met.
- 2.8 The need to diversity the town's economy is a current problem. In line with the NPPF the Local Plan should set criteria or identify strategic sites to meet anticipated needs over the plan period. As outlined in previous representations, Bushfield Camp is an inappropriate location for a knowledge park. There is no certainty that Bushfield Camp would even be available for development given the current attempts to designate it as a Village Green, or that it would be financially viable (indeed the studies commissioned on this issue to date suggest it would not be financially viable). Other fundamental issues would also need to be overcome including those associated with the impact of development in this location on the River Itchen SAC, the fact that it would add to existing congestion at Junction 11 of the M3 and as a prominent site it would have a significant impact on views from the South Downs National Park. Notwithstanding the site's inherent unsuitability, the Plan does not provide any flexibility to allow an alternative site to come forward.

- 2.9 The NPPF confirms that the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth and therefore significant weight should be placed on the need to support economic growth through the planning system. The failure of the Local Plan Part 1 to allocate an appropriate and deliverable site for a knowledge park renders it out of conformity with the general policies and principles of the NPPF.

3.0 Proposed Modifications

- 3.1 It is noted that a new paragraph has been inserted after Policy DS1 (Modification No. 30) to indicate the delivery mechanisms for key infrastructure. Whilst Bovis Homes and Heron Land Developments agree that it is important that the delivery mechanisms for key infrastructure is referred to in the Policy, the level of detail provided in the Infrastructure Delivery Plan at Appendix E is inadequate.
- 3.2 In relation to transport and the strategic road network in particular, the issue of congestion on the M3 and significant network stress levels at junctions 8 – 14 is recorded. However, no detail is provided on how this issue will be addressed. Further detail should be provided on the nature of the transport improvement packages and off-site highway improvement schemes, particularly in relation to land north of Winchester, which is the subject of a planning application. The contingency measures proposed are similarly inadequate.
- 3.3 It is only by properly identifying the schemes required to reduce the levels of congestion at key junctions that they can be properly costed and plans identified for their delivery. A comprehensive, mixed-use development at Barton Farm and on land North of Wellhouse Lane will generate significantly greater levels of developer contributions for infrastructure improvements.
- 3.4 Modifications are also proposed to Winchester's development needs to achieve the spatial vision (Modification No. 35). Whilst these needs are agreed, the Local Plan Part 1 does not address them. For example, it is not clear how the Plan will address vehicle movements whilst reducing carbon emissions particularly in the central area, which is designated as an Area Quality Management Area.
- 3.5 The need to reduce commuting is also a worthy objective but is similarly not addressed. It is not sufficient to rely on the allocation of an Opportunity Site at Bushfield Camp as having the potential to deliver the additional high quality employment floorspace needed to attract high-end jobs, when the Council's evidence base to date suggests the site is inappropriate and not viable for such a use.
- 3.6 The allocation of land north of Wellhouse Lane for a mixed-use development including a knowledge park, is likely to improve the match between residents and jobs and thus have a positive impact on commuting levels.

- 3.7 In relation of employment and commercial premises, Modification Number 37 includes a reference to the area around Winchester Station as an area of the town that lends itself to this form of redevelopment. Whilst Bovis and Heron do not disagree that this would be an appropriate employment site, it is noted that this area is also included in the SHLAA as an appropriate housing site. It is not appropriate for the Council to double count this site, and others, as meeting both their employment and housing needs.
- 3.8 Modification Number 41 proposes to delete reference to the shortfall in open space and recreational facilities. Bovis and Heron object to this proposed modification on the grounds that it is both appropriate and necessary to quantify the shortfall in order that it can be properly addressed.
- 3.9 Given this acknowledged shortfall in open space provision, it is unclear why the land to the east of the railway land at Barton Farm has been identified to meet the green infrastructure requirements generated by the development of Barton Farm, when this same land was previously reserved for the provision of new recreational facilities to accommodate existing shortfalls of children's play and sports facilities identified in the area in the adopted Local Plan.
- 3.10 In relation to opportunities for economic development, Policy WT1 is proposed to be modified to include reference to new development or redevelopment to provide for new business growth (Modification Number 43). Whilst Bovis and Heron do not object to the modification per se, the policy should specify the amount of additional employment space to be provided and either allocate appropriate sites or set out criteria for the identification of appropriate sites. The wording in the pre-submission draft expressed a clearer intention of the need to provide new employment floorspace in appropriate locations, albeit that the quantum and indication of those locations was not specified. This intention has been diluted by the proposed modification.
- 3.11 Modification Number 44 sets out how policy WT1 is proposed to be delivered. Bovis Homes and Heron Land Developments object to the inclusion of Policy WT3 as delivering Policy WT1 on the basis that it is an opportunity site which may never be delivered. Furthermore as the ultimate use of Bushfield Camp is not specified in WT3 it cannot be said to be delivering Policy WT1. The Plan as drafted is not sufficiently flexible to deal with a scenario where Bushfield Camp does not come forward.
- 3.12 The implementation of Policy WT2 – Strategic Housing Allocation North Winchester is dealt with in Modification Number 46. Bovis and Heron consider that the Plan should clarify how the Council will determine whether the site is delivering the level of housing proposed and at what point. It is not appropriate to leave contingency arrangements until Local Plan Part 2 or subsequent reviews of Local Plan Part 1 due to the significant time lag between allocation and delivery.
- 3.13 Bovis and Heron object to Modification 48 on the implementation of Policy WT3 – Opportunity Site at Bushfield Camp. As it is not clear what

development, if any, will take place on Bushfield Camp, or what need it is intended to meet, it is not possible to state that Policy WT3 will meet those needs.

- 3.14 It is noted that Bushfield Camp is not the subject of an HRA assessment; rather this task has been left to a project HRA at the time of an application. The HRA should include the entire plan and its proposals, particularly given this site's relationship with the River Itchen SAC. The very fact that the Council are unable to complete an HRA of the site at a strategic level suggests it is inappropriate for inclusion in Local Plan Part 1. This site should be re-considered as part of Local Plan Part 2 should it be required and additional land north of Winchester should be allocated as a strategic employment site as part of a comprehensive mixed use development.

4. Conclusion

- 4.1 Bovis Homes and Heron Land Developments have participated in each stage of the preparation of the Local Plan Part 1 Joint Core Strategy and have consistently promoted the comprehensive development of land north of Winchester as the most appropriate location for meeting the strategic residential and business needs of the area. The arguments put forward by Bovis and Heron are fully supported by policies in the NPPF.
- 4.2 The proposed modifications to the Local Plan Part 1 do not address the issues raised by Bovis and Heron in previous rounds of consultation and consequently the Plan lacks sufficient detail and certainty on how the identified development needs will be met. The Plan as currently drafted is unsound as it is neither positively prepared, justified nor effective.