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30 July 2012

Dear Ms Morton,

Winchester District Local Plan Part 1 - submission

Thank you for the opportunity to add to comments submitted on behalf of the Church Commissioners for England at the pre-submission stage (reference 2201).

Proposed Modifications

We welcome the proposed modifications to the text of policy WT3: Bushfield Camp Opportunity Site (**modification 47**), namely the reference to allowing space for strategic landscaping, and need for mitigating (as well as minimising) the impacts on the strategic highway network. Also, the minor clarification of the site's ability to exploit the proximity to the South Winchester Park and Ride is supported. There is a clear opportunity, we consider, for development of the site to exploit and help sustain, the bus services from the park and ride to the city centre.

Modification 48 is also generally supported, although we would wish to reserve the right to query the detail of this text at the examination. This modification helps to clarify the justification of the opportunity site policy.

A new reference is made to the policy being related to currently unidentified needs. This is considered to be an appropriate reference but must be seen in the context of

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the evidence, including the Employment Land and Retail Study (Background Paper 4, June 2012). This paper makes reference to the Review of Employment Prospects Report (DTZ, August 2011). In section 4, this points to the evidence base demonstrating that there is a real need to broaden and diversify the Winchester Town economy to ensure that it does not remain overly reliant on the public sector. This is clear evidence of the need to provide the infrastructure to facilitate this, namely the provision of appropriate sites for employment purposes.

We consider that paragraph 4.11 of Background Paper 4 summarises the position accurately:

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 therefore identifies land at Bushfield Camp as an 'opportunity site', which is 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.

The opportunity site will enable the local plan to respond to future need should a knowledge park scheme, or other employment generating scheme, become desirable for the sustainability of the local economy during the plan period. Its allocation will give a clear signal to the market of the existence of a highly attractive site. The wider benefits that a knowledge park development could have for the local economy are recognised in the adopted Winchester Economic Strategy 2010-2015.

In our pre-submission representations, we referred to the Academy of Urbanism report (September 2011) for the City Council, which recognized that a significant weakness for Winchester was the lack of space for the arrival of a new major employer, or relocation of an existing employer needing room to expand locally. Such needs are not always evident at the adoption of a local plan, but can quickly emerge through the plan period, particularly when the wider economic climate is in a state of transition. Without deliverable opportunity sites, the local economy is at risk of missing out on opportunities to capture new investment, particularly in an increasingly competitive regional economic context.

In relation to proposed **modification 35**, which includes adding an acknowledgement that there is a shortfall of recreation land in Winchester Town, we would wish to re-emphasise the ability of the opportunity at Bushfield Camp to provide a significant area of land for public open space as a part of the release of part of the site for development. We support the modification, in this respect, and consider it further justifies the inclusion of policy WT3 in the Winchester Town strategy, which requires land to be laid out for public use. This would make a significant strategic contribution to the city's green infrastructure.

We do not support **modification 37** at this stage. This suggests that an area around Winchester station "lends itself" to redevelopment, with its mix of commercial, retail,

residential and office space. While this may be an obvious area to seek redevelopment opportunity, with its high accessibility, it is not stated where there is evidence to support this assertion, for example land ownership. Therefore, the plan is potentially unsound if it assumes there is redevelopment potential without evidence of availability and deliverability, and a clear strategy for development opportunities within the city.

National Planning Policy Framework (NPPF)

Building a strong, competitive economy

Published since the pre-submission consultation, the NPPF is clear that a key priority of the Government is to build on the country's inherent strengths in meeting the twin challenges of global competition and a low carbon future. Following clear statements in the Budget, the NPPF confirms that the planning system is seen as central to enabling and delivering sustainable economic growth and local authorities are challenged to plan proactively to support business needs and support a modern economy (paragraph 20).

Policy WT3 is a proactive response to the local economic challenges facing Winchester, notably the cuts in the public sector, which emerged strongly in the consultation exercises and evidence base. The opportunity site is part of a vision for the town to build on its strengths, including in the knowledge and creative industries (policy WT1).

Local authorities are encouraged to identify strategic sites for local and inward investment "to meet *anticipated needs*" over the plan period (paragraph 21; our emphasis). Policy WT3 conforms with this approach, and especially in the absence of other available land assets to meet such needs, land at Bushfield Camp, part of which is previously developed, is a suitable site to be identified.

While there may not be an identified, quantified need for the opportunity site at this time (as stated in proposed modification 48), the NPPF is clear that policies should be flexible enough to accommodate needs not anticipated and to allow for rapid response to changes in economic circumstances. Policy WT3 gives the Local Plan this flexibility.

Promoting sustainable transport

The NPPF encourages plans to locate development that is likely to generate significant movement, in locations where the need to travel will be minimised. As it recognized in policy WT3, land at Bushfield Camp is well related to the South Winchester park and ride to exploit the bus connections to the city centre. The policy also has wider emphasis on accessibility and there are likely to be opportunities in this location, on

the southern side of the city, to improve pedestrian and cycle access and connectivity from the surrounding neighborhoods to the city centre.

The opportunity site also gives potential for Winchester Town to address the city's commuting issues, for example by providing more high-value employment opportunities for the city's skilled population (paragraph 3.16).

Conserving and enhancing the natural and historic environment

Protection of the natural and historic environment is another key objective of the NPPF. Policy WT3 recognizes that land at Bushfield Camp can only be developed within strict criteria that will seek to ensure that the environmental and historic importance in this location is respected. As noted in the evidence base, the site has been subject to development proposals in the past, and there is a lot of public interest in its future. The opportunity site policy is a proactive response to the importance of this location within the setting of the historic city.

Without this criteria-based policy, which covers to some 43 hectares on the edge of Winchester (Map 5), should development pressures grow over the plan period, the site would be more vulnerable to further speculative proposals. With this opportunity policy within the strategy for Winchester Town, the local authority has appropriate control over the site's future and is better placed to secure the wider benefits (social, economic and environmental) that can be delivered alongside development of the former camp area.

Ensuring the vitality of town centres

Inclusion of policy WT3 in the strategy for Winchester Town also conforms with the NPPF's key objective of protecting the health and vitality of town centres.

Paragraph 3.38 of the Local Plan Part 1 indicates that the site is not suited to uses that could and should be accommodated within or adjoining the town centre. With this opportunity policy the local authority can manage the site's future and ensure that any development proposals that come forward are only supported where they complement the overall strategy for Winchester Town. The main focus for development in Winchester Town is within the established development boundaries, but policy WT3 gives flexibility to capture growth that would not be appropriate or possible within the constraints of the existing urban fabric.

We thank you again for this opportunity to add to our representations and trust that these comments will be given due consideration at the examination.

Yours sincerely,

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A handwritten signature in black ink, appearing to be 'Ann Bartaby', written in a cursive style.

Ann Bartaby
Director

cc John Weir, Church Commissioners for England