

# CHAPTER 7: EMPLOYMENT

## 7.1. General Comments

### OBJECTIONS TO DEPOSIT PLAN

Proposal/ Paragraph	Rep Number	NAME
CHAP.7	475/3 & 6	Clients of Southern Planning Practice
CHAP.7	539/1	F G Stephens and Sons
CHAP.7	1434/44	Hampshire County Council
CHAP.7	499/1 & 2	Humphrey Farms Ltd
CHAP.7	353/17	Sparsholt College Hampshire
CHAP.7	415/2	St Michaels Development Co. Ltd
CHAP.7	536/1	Stenoak Associated Services

### ISSUES

1. Is there a conflict between Proposal E.2 and countryside policies and should employment sites in the countryside be encouraged to modernise, expand and redevelop? (475/3)
2. Should farm buildings in and on the edge of settlements be counted as Previously Developed Land and permitted for housing in preference to employment? (475/6)
3. Should land at the following farms be allocated for employment or mixed use so that they can be developed on a comprehensive basis to enhance the environment or contribute to the rural economy?
  - Lycroft Farm, Upper Swanmore (539/1)
  - Bells Ground Farm, Lower Slackstead (499/1)
  - Wolfhanger Farm, Bramdean Common (499/2)
4. Should land at Concorde Way, Segensworth be re-evaluated and alternative uses (B1, B2 and B8) allowed? (1434/44)
5. Should Sparsholt College should have special provision (as the MOD has) to allow essential development? (353/17)
6. Does the Plan identify sufficient employment sites to meet the needs of the district and should Table 3 be amended to include reference to a potential employment site at Poles Lane, Otterbourne? (415/2)
7. Should an additional policy be included to allow unsuitable uses within villages be removed from close proximity to housing and to relocate in the countryside? (536/1)

### INSPECTOR'S CONSIDERATION AND CONCLUSIONS

- 7.1.1 In response to the first issue, the Council introduced an additional policy and text in the Countryside Chapter (RD04.37-04.43), to provide for existing employment sites in the countryside to modernise, expand or redevelop, subject to meeting specified criteria. I consider this suitably addresses the objection.
- 7.1.2 In the second issue, I agree with the Council that the PPG3 definition of Previously Developed Land (PDL) specifically excludes agricultural or forestry buildings and that it would be inappropriate for the Plan to introduce a new definition of PDL that would conflict with national guidance. Moreover, advice in the recently issued PPS7 indicates that the re-use of agricultural buildings for economic development purposes will usually be preferable.
- 7.1.3 Issue three concerns specific proposals in respect of complexes of farm buildings on individual sites. The Local Plan process is not intended to be a vehicle for the consideration of specific development proposals that could be readily considered under normal development control procedures. I consider the Plan provides a policy

framework for the consideration and determination of specific proposals in respect of particular sites, having regard to the varying circumstances that apply in each case. Moreover, there has been no detailed evidence advanced by the objectors to justify an employment allocation for any of these locations and there are in any event sufficient employment sites within the District to meet the identified demand.

- 7.1.4 The fourth issue relates to a locality in respect of which there are no proposals in the Plan and seemingly arises from requirements in a Section 106 agreement, to which the objector is a signatory. The matter of altering the terms of a legal agreement is outside the remit of the Local Plan Inquiry.
- 7.1.5 The fifth issue attempts to draw a comparison between the special policies applicable to MOD sites and the circumstances pertaining to Sparsholt College. However, whilst the college is a sizeable establishment and a significant employer, it is an individual site and I agree with the Council that it does not warrant special treatment. However, the Council has introduced an additional policy and text (RD08.18-08.22) in Chapter 8 specifically concerning educational establishments in the countryside, which I regard as going a long way towards addressing the objection.
- 7.1.6 The objector in issue six seeks the allocation of 1.6ha of land at Poles Lane, Otterbourne as an employment site and added to the list of sites in Table 3. It is situated in the countryside west of Otterbourne and is separated from the built-up area by the embankment of the M3 motorway. The land contains several buildings and in 1995 a lawful development certificate was issued in respect of part of the site as a builder's yard for storage of builders' plant and materials and as a Goods Vehicle Operations Centre. In addition, planning permission was granted for the change of Use of the barn from agricultural to B1 business use. Having regard to these, the parties agree that a maximum of 0.247ha can be classed as Previously Developed Land. Clearly therefore, the allocation of the entire site for employment uses would entail a material increase in the land available for this purpose.
- 7.1.7 The Council outlined that they regard present commitments for employment floorspace equate to a supply in excess of at least 20 years. However, the objector considers there to be a qualitative rather than quantitative need for additional employment land, as the majority of the provision in Table 3 is on strategic sites, whereas they consider there is a particular need for the provision of small scale sites to serve SMEs in the District. Notwithstanding the fact that some allocations towards the edge of the District could be attractive to employers based in neighbouring authorities and the possibility that there may well be firms more centrally positioned that are seeking premises in this locality, I was provided with no specific details to support either view and I assess the proposal as being entirely speculative.
- 7.1.8 I note the illustrative scheme would not utilise the entire site as it proposes retention and reinforcement of the planted buffer to the road frontage and flank boundaries to ensure screening is maintained for any development on the site. However, the fact remains that the site is located in the countryside and thus, in an area where built development is not encouraged unless it is essential to serve countryside uses or necessarily requires a rural setting. I am content that the land already supports lawful employment uses and that proposals by local firms to relocate, expand or redevelop their businesses in the countryside can be considered under the new policy and text that has been inserted in the Countryside Chapter to address such issues. Hence, I am not persuaded of the need to specifically allocate an employment site in this locality and I therefore propose no modification in respect of this objection.
- 7.1.9 Issue seven concerns potential planning gains that may be achievable through relocating existing commercial uses from within settlements to a rural location whereby a site might be released for housing use and the activity continued in a position that does not cause injury to amenities of occupiers in adjoining housing. Although the objector considers that merits a new policy, the Council disagree as it would effectively be an exception to the usual policies concerning development in the

countryside. I agree with the Council's stance and consider any negotiations to secure a planning gain that would involve departure from the widely accepted policies governing development in the countryside, are more appropriately dealt with on their individual merits as exceptions from the Plan's Proposals.

## **RECOMMENDATION**

7.1.10 That no modification be made to the Plan.

## **7.2. Employment Strategy - New Development (paragraphs 7.8 - 7.15, Proposal E.1)**

### **OBJECTIONS TO DEPOSIT PLAN**

<b>Proposal/ Paragraph</b>	<b>Rep Number</b>	<b>NAME</b>
07.8	1387/3 & 4	CPRE Mid Hampshire District Group
07.8	261/39	Government Office for the South East
07.10	211/7	Bishops Waltham Parish Council
07.10	479/2	J Brewer
07.12	354/5	Hallam Land Management
E.1	211/8	Bishops Waltham Parish Council
E.1	863/2	G Payne
E.1	374/14	Hawthorne Kamm Ltd
E.1	264/2	IBM United Kingdom Limited
E.1	138/7	John Hayter
E.1	1249/20	P.A Warner
E.1	469/7	Westbury Homes (Holdings) Ltd

### **OBJECTIONS TO REVISED DEPOSIT PLAN**

<b>Proposal/ Paragraph</b>	<b>Rep Number</b>	<b>NAME</b>
RD0701	863/2	G Payne
RD0701	469/2 & 4	Westbury Homes (Holdings) Ltd
RD0701	2307/2	Westbury Homes (Holdings) Ltd.
RD0704	138/10	John Hayter

### **OBJECTIONS TO PRE INQUIRY CHANGES**

<b>Proposal/ Paragraph</b>	<b>Rep Number</b>	<b>NAME</b>
PI0702	138/18	John Hayter

### **ISSUES**

1. Should the overall provision for employment sites be examined at a more strategic level to avoid over-provision and should existing approved sites be developed before newly-allocated sites are approved? (1387/3, 1387/4)
2. Should settlement boundaries be extended/land allocated at the following locations?
  - Land at Pitt Manor, Winchester. (863/2, 863/2/REVDEP)
  - Land at Southampton Lodge, Hursley. (264/2)
  - Land at Basingstoke Road, Kings Worthy. (469/7)
  - Land at Durley Brook Farm, Durley (479/2)
3. Is Proposal E.1 too restrictive, with insufficient consideration given to brownfield sites outside settlements? (1249/20, 374/14)

4. Has the sequential approach in PPG6 been applied to office allocations carried over from the adopted Local Plan? (261/39)
5. Should the reference in paragraph 7.12 to employment use forming the largest proportion of development in mixed use allocations be deleted? (354/5)
6. Does the policy and text require amendment in the interest of clarity?(138/7, 211/8, 138/10/REVDEP, 138/18/PIC)
7. Should the Plan allow for B2 and B8 uses on the sites allocated in Table 3? (211/7)
8. Is RD07.01 too vague in relation to the extent of employment land at Winchester City (North) and is there likely to be a shortfall which would justify allocating land at Lovedon Lane, Kings Worthy? (469/2 & 4/REVDEP)

## **INSPECTOR'S CONSIDERATION AND CONCLUSIONS**

- 7.2.1 The objectors in the first issue are concerned that given the low level of unemployment in the District there is potential for the over allocation of employment sites to add to “overheating” in the South East generally. As the Council indicate, the employment allocations stem from the assessment of need and demand prepared by the County Council and a business survey and a strategic overview has thereby been maintained. Furthermore, some of the major allocations referred to by the objector at Waterlooville and in the Havant Gap are in the neighbouring Authority’s Local Plan, while the large allocations at Whiteley already benefit from planning permission and Phase 2 is clearly intended to follow completion of Phase 1. The matter of revoking extant approvals is outside the remit of this Inquiry. All the sites previously allocated for employment use in the adopted plan that were not committed have been assessed as to their sustainability and likelihood of implementation as recommended in PPG3, whereby some are now promoted as mixed use sites.
- 7.2.2 Turning to the second issue, objectors propose extensions to settlement boundaries with a view to including sites within them for employment development uses. However, the studies undertaken by the Council identify that rather than there being insufficient sites for employment purposes there were more than adequate allocations already, whereby some were re-allocated for mixed use schemes.
- 7.2.3 Land at Pitt Manor, Winchester. The objectors amended their objection in respect of this site so as to delete the proposed employment content and replace it by a Park and Ride scheme. As the Council regards that amendment as having been ‘duly made’, I have dealt with the objection accordingly in the Housing Omissions section of my report.
- 7.2.4 Land at Southampton Lodge, Hursley. The main issue governing the future use of this site is concerned with the legal planning status of the land. Unfortunately this was not resolved before the Inquiry closed and is therefore a matter to be pursued independently. Although IBM seeks the site’s inclusion within the settlement boundary for the village, I do not regard it as necessary or appropriate to include the site within the defined built-up area limits. Indeed, the major IBM complex is itself excluded therefrom.
- 7.2.5 Land at Basingstoke Road, Kings Worthy. Although described differently, this is the same site as that referred to as ‘Land at Lovedon Lane’ in Issue 8. In the Housing Omissions section of my report, I explain that because of landscape considerations and the importance of maintaining a Local Gap between Kings Worthy and Abbots Worthy, I do not consider that the settlement policy boundary should be altered or land allocated for development in this location.
- 7.2.6 Land at Durley Brook Farm, Durley. This site is promoted for employment or mixed commercial/residential use by the objector, but no substantive evidence has been advanced to justify the proposal apart from the fact that the farm has become run down. Indeed, there is a specific mixed use allocation in respect of land at the former sawmill at Durley (S14) which is perceived by the Council as capable of meeting local business requirements and which also makes efficient use of a previously developed

site within the settlement. By contrast this is a large site that does not fall within the definition of previously developed land and I am satisfied the Plan's policies already satisfactorily provide for alternative uses to be made of redundant farm buildings in the countryside.

- 7.2.7 The objectors in the third issue regard Policy E1 as too restrictive and consider that it should be permissive of employment uses on brownfield sites outside settlement boundaries, especially for rural enterprises. However, I consider Policies C15 and C16 already provide for farm diversification, rural enterprise and re-use of former farm buildings for employment use. Furthermore the new policy and text relating to redevelopment and extension of existing rural businesses provides further flexibility. Accordingly, I consider no change is necessary to Policy E1 to address this matter.
- 7.2.8 In issue four, GOSE consider the first bullet point of para 7.8 is unclear as to whether advice in PPG6 has been complied with regarding the sequential approach to locating offices in town centres first. However, the Council confirm that none of the allocations carried forward from the adopted Plan are specifically for offices, apart from perhaps at Whiteley where they are considered to be appropriate in the context of a major Business Park. In light of that confirmation, I consider the advice has been met and no specific modification is required.
- 7.2.9 Issue five relates to the appropriateness in para 7.12 of the indication that business use should form the largest proportion of the development in mixed use schemes. The Council indicated that these sites were formerly entirely employment allocations and have been altered to mixed use in recognition that the scale of an employment-only allocation may be too large for the village concerned and/or in order to provide increased value to assist implementation. However, I note the sites vary in size from 0.4ha to 2.2ha and the villages also range widely in their size, facilities, accessibility and presence of existing employment uses. I consider it is matters such as these which are more relevant considerations when determining the appropriate level of employment use rather than a bald indication that the largest proportion of the development should be business use. Indeed, it is unclear whether that is applicable to the site area or floorspace and to my mind it appears entirely arbitrary and unrelated to the suitability of the site or numbers of jobs that would be likely generated. Accordingly, I consider the offending text could usefully be deleted without impairing the intent particularly as the Inquiry has afforded the opportunity to scrutinise some of the sites in detail.
- 7.2.10 In response to various detailed amendments suggested by objectors in issue six, amendments to the policy and text were incorporated in the Revised Deposit (RD07.03 & RD07.04). Following further detailed objections the Council acknowledged that the policy and accompanying text would benefit from further refinement and advanced PICs 07.01, 07.02 & 07.03 to address them. Whilst these do not entirely match the objectors' suggested wording, I consider they largely meet their concerns and agree with the majority of the Council's reasons for not adopting the additional amendments advanced. The objector accepts two of the PICs but considers PIC07.02 should refer to 'B1, B2 or B8' uses and that reference to the built-up area of Winchester is unclear. I agree with the objector that for consistency with Policy E2 and PIC 07.03 the policy should refer to *or* rather than *and*. Furthermore, I consider it unnecessary to make cross-references to other policies within a policy as it makes the wording unwieldy and in any event all proposals fall to be considered against every relevant Plan policy. Accordingly, I agree that the PICs 07.01 and 07.03 provide the added clarity sought. However, I consider PIC 07.02 should be modified to delete the cross-referencing to other policies and to replace *and* with *or*.
- 7.2.11 With regard to issue seven, the Council indicated that some of the sites in Table 3 do in fact provide for B2 and B8 Uses and the objector is therefore incorrect in their presumption. I am also satisfied that the Plan provides sufficient flexibility for employment uses to adapt and expand.

7.2.12 The objector in issue eight considers that the text inserted in para 7.8 regarding the possibility of employment provision as part of the Reserve Winchester City (North) MDA is unduly vague. However the Council indicates that unlike the Structure Plan proposal for the West of Waterlooville MDA, which specifies an area for employment use, there was no specific employment requirement identified for Winchester City (North) MDA. Indeed, the Council states that there are far more jobs than employees to fill them in Winchester and the Reserve MDA was partly intended to redress this imbalance. Moreover, as the timing for its implementation is unknown, the Council were deliberately less prescriptive than would otherwise have been the case due to uncertainties regarding the job/employee balance that may pertain. Information from the 2001 Census has since become available and would appear to demonstrate the unlikelihood of major employment provision being required at the Winchester City (North) MDA. By the same token, it is clearly inappropriate to make alternative employment provision at Lovedon Lane, Kings Worthy, especially as in the Housing Omissions section of my report I conclude that the Proposal H.2 settlement policy boundary for Kings Worthy should not be altered.

### RECOMMENDATIONS

- 7.2.13 That the Plan be modified:
- a) by deleting “*should form the largest proportion of the development, but*” from the second sentence of para 7.12.
  - b) in accordance with PICs 07.01 & 07.03
  - c) by amending PIC07.02 as follows: *Small scale commercial or business development, redevelopment or changes of use (normally falling within Use Classes B1, B2 or B8) will be permitted within the built-up areas of settlements provided;*

## 7.3. Existing Employment (paragraphs 7.16 - 7.23, Proposal E.2)

### OBJECTIONS TO DEPOSIT PLAN

Proposal/ Paragraph	Rep Number	NAME
07.21	487/2	Coil Master Ltd
07.21	539/3	F G Stephens And Sons
07.21	476/3	G Arturi
07.21	493/1	GHL Liftrucks Ltd
07.21	259/2	Hydro Agri (UK) Ltd
07.21	479/4	J Brewer
07.21	501/3	James Judd
07.21	512/2	Nations Farm Ltd
07.21	523/4	Winchester Growers
E.2	325/1	B and Q Plc
E.2	211/9	Bishops Waltham Parish Council
E.2	373/1	Bryan Jezeph Consultancy
E.2	176/6	Chris Slattery
E.2	972/3	E Fitzgerald
E.2	972/5	E Fitzgerald
E.2	972/4	E Fitzgerald
E.2	203/1	Heritage Commercial Properties
E.2	138/8	John Hayter
E.2	289/13	Kris Mitra Associates Ltd
E.2	175/11	Save Barton Farm Group

## OBJECTIONS TO REVISED DEPOSIT PLAN

Proposal/ Paragraph	Rep Number	NAME
RD0705	325/1	B & Q Plc
RD0705	2312/25	Kingfisher Housing Association
RD0707	2312/26	Kingfisher Housing Association
RD0708	2312/27	Kingfisher Housing Association
RD0708	2207/2	South Coast Fencing (manufacturing) Ltd

### ISSUES

1. Does E.2 and the supporting text deal clearly and properly with countryside issues and follow the Structure Plan and PPG7 guidance? (2207/2/REVDEP, 2312/27/REVDEP, 259/2, 476/3, 479/4, 493/1, 501/3, 512/2, 523/4, 539/3, 487/2)
2. Does E.2 give the optimum level of flexibility to allow consideration of alternative uses, particularly housing? (138/8, 211/9, 325/1, 373/1, 972/3, 972/5, 972/4, 2312/26/REVDEP, 2312/25/REVDEP, 325/1/REVDEP)
3. Should E.2 be deleted on the basis that it is not based on market analysis, it sterilises land in B2 and B8 use, and similar policies have not been applied consistently in the past? (203/1, 175/11)
4. Has more employment land been allocated than is necessary, as the priority need within settlements is for more affordable and smaller homes? (176/6)
5. Should E.2 cross-refer to Proposal DP.16, should paragraph 7.17 take account of other forms of development, and should paragraph 7.23 be deleted on the basis that it conflicts with PPG7? (289/13).

### INSPECTOR'S CONSIDERATION AND CONCLUSIONS

- 7.3.1 Many of the issues raised by the objectors have been covered in the Countryside Chapter and in particular the new policy and text that has been inserted specifically to address existing business uses in the countryside. Policy E2 is principally aimed at preventing the loss of existing business premises to other uses, to ensure that a broad range and distribution of employment opportunities is maintained. I do not consider the policy conflicts with either the Structure Plan or PPG7 (and PPS7) Guidance. It is apparent that most concern relates to the wording of para 7.21 which is expressed in more restrictive terms than the new policy and text that has been introduced in the Countryside Chapter. Hence, I consider the words: *but proposals to expand or redevelop such sites are unlikely to be acceptable, in view of the need to conserve and enhance the countryside* in the last part of the final sentence should be deleted. If it is considered necessary to insert replacement wording, it should comply with the more relaxed approach that has been introduced in RD04.39 and RD04.40.
- 7.3.2 Whilst some objectors in issue two regarded the policy as inflexible, others felt it to be too lax whereby employment uses could readily be replaced. The Council omitted former criterion (iii) and para 7.19 from the Revised Deposit and introduced further amendments to the text to address the concern and provide added clarity. Even with those amendments, objections to the Revised Deposit remained split in a similar way, with more tending to suggest that residential use should be identified as a suitable alternative. However, I consider this would be counter to the principal reason for having the policy and it does not in any event preclude consideration of such use on its merits if the criteria are met and it complies with other policies in the Plan. In sum, I consider the policy retains an appropriate balance and flexibility to reflect that circumstances of different sites will vary widely.
- 7.3.3 The objectors in issues three and four consider the policy should be deleted due to the surfeit of employment land in the District, which they assess as fuelling inward migration and the pressure for more housing. The Council advise that they have comprehensively assessed the employment allocations as part of the Plan Review exercise and have taken that into account when deciding whether to carry the allocations through unaltered or modified. I note also that the policy is supported by

the County Council and GOSE. The Plan's allocations might appear excessive to the objectors, but this is mainly due to the major proposals at Whiteley and West of Waterlooville which are strategic employment allocations, intended to serve a wider area than Winchester District. The remainder are comparatively small and distributed around the District. Hence, I do not accept the objectors' contentions and consider the policy serves a useful purpose and should thus be retained. The topics of affordable and smaller dwellings are covered in the Housing Chapter.

- 7.3.4 The objector in issue five considers a cross-reference should be made in the policy to Proposal DP.16 (contaminated land) but as the Council indicate, this is one of the many environmental factors already encompassed by criterion (i). Moreover, it is generally regarded to be bad practice to include cross-references to other Plan policies within individual policies as it makes them repetitive and unwieldy. Therefore, in common with the stance I have applied elsewhere, I consider it is unnecessary to include the cross-reference to other Plan policies within the policy itself and therefore recommend its deletion. Whilst the objector also considers para 7.23 conflicts with advice in PPG7, I am satisfied that the national guidance therein and in the successor PPS7 recommends re-use of rural buildings for economic development purposes as the preferred option.

### RECOMMENDATIONS

- 7.3.5 That the Plan be modified by:
- deleting the words: *but proposals to expand or redevelop such sites are unlikely to be acceptable, in view of the need to conserve and enhance the countryside* in the last part of the final sentence of para 7.21.
  - deleting criterion (iii) from the policy.

## 7.4. Office Development in Winchester (paragraphs 7.24 - 7.32, Proposals E.3, E.4)

### OBJECTIONS TO DEPOSIT PLAN

Proposal/ Paragraph	Rep Number	NAME
07.29	1434/36	Hampshire County Council
E.4	205/2	G Humphrey
E.4	374/15	Hawthorne Kamm Ltd
E.4	203/2	Heritage Commercial Properties
E.4	323/3	Heritage Property Holdings Ltd
E.4	204/1	K Larkin
E.4	202/1	Michael Adams

### OBJECTIONS TO REVISED DEPOSIT PLAN

Proposal/ Paragraph	Rep Number	NAME
RD0710	205/2	G Humphrey
RD0710	204/2	K Larkin
RD0710	2312/28	Kingfisher Housing Association
RD0711	2312/29	Kingfisher Housing Association

### ISSUES

- Is the limitation of 200 sq metres in paragraph 7.29 appropriate as the County Council is a major public service provider and this may hinder essential rationalisation? (1434/36)
- Whether Proposal E.4 is inconsistent with PPG4 and places unnecessary restrictions on business, resulting in major employers leaving Winchester leading to a decline in Winchester's economy? (374/15, 202/1, 203/2, 323/3)



3. Does the Plan give adequate consideration to the need for office development outside the defined town centre of Winchester and does it accord with Structure Plan Policy MDA1, in relation to Winchester City (North) MDA? (204/1, 205/2, 204/2/REVDEP, 205/2/REVDEP)
4. Should RD07.10 be re-instated to allow for reconsideration of uses in the town centre, such as mixed use and residential schemes? (2312/28/REVDEP, 2312/29/REVDEP)

### **INSPECTOR'S CONSIDERATION AND CONCLUSIONS**

- 7.4.1 The County Council are concerned that the 200 sq metres limitation for new office floorspace within Winchester city centre prescribed in Policy E3 and its accompanying text could hinder provision of essential public service office space. However, as the District Council indicates, the policy criteria provide for schemes above this size being approved where an operational need can be demonstrated. I am content that offices to provide essential public services in the city centre would fall in that category and warrant an exception to the policy, where it can be demonstrated the existing County Council office floorspace cannot accommodate it.
- 7.4.2 Objectors in the second issue regard Policy E4 as unnecessarily restrictive. However, it is apparent that the need to control office development outside Winchester city centre has been recognised for some time and successive Plans have incorporated policies to restrict office growth to avoid undue pressure on infrastructure and housing that would otherwise arise. Information from the 2001 Census continues to demonstrate that there are 8376 more jobs in Winchester than there are working residents, leading to considerable inward commuting. The Council regard the restrictive policy as not so much promoting a decline in Winchester's economy but seeking to prevent its overheating by widening the imbalance between resident employees and jobs. I consider the two policies (E3 & E4) combine to provide an appropriate balance between addressing the need for small-scale office development in the city (identified in the 2000 business survey and the County Council's Economic Profile) and continuing to apply a measure of wider constraint that has existed in successive plans. I regard this as being a sustainable approach to dealing with office development in Winchester which also follows the sequential approach advocated in PPG4 and recognises the importance of ensuring the economy remains broadly based as recommended in RPG9.
- 7.4.3 Despite the objectors' fears in the third issue that the policy could preclude office development within the Winchester City (North) Reserve MDA, the Council correctly indicate that Policy NC3 provides for "appropriate employment provision" within the MDA. I therefore consider the issue is not necessarily precluded by Policy E4 and is a matter that would be more satisfactorily assessed as part of the masterplanning process for the MDA.
- 7.4.4 The fourth issue concerns the objections by Kingfisher Housing Association, who consider there should be scope for alternative uses other than offices, such as residential and mixed use schemes. However as the policies deal specifically with office use and there are other policies relating to housing, I consider no modification is appropriate.

### **RECOMMENDATION**

- 7.4.5 That no modification be made to the Plan.

## 7.5. Ministry of Defence Land (paragraphs 7.35 - 7.40, Proposals E.5, E.6)

### OBJECTIONS TO DEPOSIT PLAN

Proposal/ Paragraph	Rep Number	NAME
E.5	261/43	Government Office for the South East
E.5	306/4	Ministry of Defence
E.6	174/4	Ann Gossling
E.6	261/44	Government Office for the South East
E.6	175/12	Save Barton Farm Group
E.6	306/5	Ministry Of Defence

### ISSUES

1. Does E.5 incorrectly and unnecessarily provide a planning policy for Crown Land development? (261/43, 306/4)
2. Are E6 criteria (ii) (iii) and (v) too restrictive? (306/5, 175/12, 174/4)
3. Is E6 criterion (iii) referring to removing buildings, contrary to Circular 18/84? (261/44)

### INSPECTOR'S CONSIDERATION AND CONCLUSIONS

- 7.5.1 GOSE and the MOD indicate that, at present, operational development on Crown Land is exempt and Councils are consulted under procedures set out in Circular 18/84 and thus they regard the policy as unnecessary. However, the Council regard the consultation process as beneficial to all parties and consider that in view of the number and extent of MOD establishments in the District, it is useful to have a policy setting out criteria to guide the MOD in evolving its proposals and to advise the basis upon which the Council will respond to such consultations. The principal purpose of Plan policies is to set out a framework for determining planning applications and as indicated, the Crown does not currently require planning permission and hence the need for Policy E5 is questionable. Furthermore, the policy makes extensive cross-reference to other policies in the Plan and includes criteria that are applicable to other landowners. Although Crown exemption is proposed to be changed under Part 7 of the Planning and Compulsory Purchase Act 2004, I am satisfied adequate controls and guidelines exist elsewhere in the Plan without the need for this policy. I thus consider its contents could be abridged and converted to text.
- 7.5.2 Proposal E.6, relates to criteria that would be applied to the re-use or redevelopment of surplus MOD sites in the countryside. It is generally welcomed by the MOD while The Save Barton Farm Group argue such areas should be regarded as brownfield sites and considered for development before any greenfield site. All objectors consider that the policy should not be unduly restrictive. Once again, the policy makes extensive cross-reference to other Plan policies and as it is of general application to any surplus MOD site in the countryside, irrespective of size or location, the considerations would not differ from any other owner's rural site that becomes redundant. Hence, I can see no particular need for this policy that is not already addressed elsewhere. I therefore consider that its contents could be abridged and converted to text.

### RECOMMENDATION

- 7.5.3 That the Plan be modified by deleting Policies E5 & E6 and including any relevant parts thereof as text.

## 7.6. Sir John Moore Barracks (paragraph 7.44)

### OBJECTIONS TO DEPOSIT PLAN

Proposal/ Paragraph	Rep Number	NAME	STATUS
07.044	306/6	Ministry of Defence	OBJECT

#### ISSUE

Should Sir John Moore Barracks be in a designated Local Gap? (306/6)

#### INSPECTOR'S CONSIDERATION AND CONCLUSIONS

7.6.1 The objection by the MOD to this paragraph relates to the reference to inclusion of the Sir John Moore Barracks in the designated Local Gap separating Littleton from Winchester. However as I saw on my visit to the Barracks and on other visits to a number of vantage points in the vicinity, the buildings on the site blend in particularly well with the surrounding rural landscape and indeed are essentially subservient to it. In my report on objections to Chapter 12, I explain that the Barracks are no longer potentially available for development with the adjoining Littleton Stud as an alternative to the Winchester City (North) Reserve MDA. Having regard to this and their discreet presence in the rural landscape I can see no merit in excluding them from the Local Gap. To do so would be contrary to the objectives of the Gap set out in the Countryside Chapter of the Plan and make it more difficult for the Council to defend other much smaller potential breaches of the Gap.

#### RECOMMENDATION

7.6.2 That no modifications be made to the Plan.

## 7.7. HMS Dryad, Southwick (paragraphs 7.46 - 7.48, Proposal E.7)

### OBJECTIONS TO DEPOSIT PLAN

Proposal/ Paragraph	Rep Number	NAME
E.07	250/5	English Heritage South East Region
E.07	1197/1	Southwick and Widley Plc
E.07	306/7	Ministry of Defence

### OBJECTIONS TO REVISED DEPOSIT PLAN

Proposal/ Paragraph	Rep Number	NAME
RD0715	2280/2	Defence Estates
RD0716	2105/2	J P Whitbourn

#### ISSUES

1. Are changes to E7 and supporting text needed because of the change in requirements of the MoD? (306/7, 1197/1)
2. Should there be a policy requirement to assess heritage features within the named MoD sites? (250/5)
3. Should the reference (in deleted paragraph 7.48) to safeguarded land and potential access to the site from Boulter Lane and Southwick Road be reinstated? (2105/2/REVDEP, 2280/2/REVDEP)

## **INSPECTOR'S CONSIDERATION AND CONCLUSIONS**

- 7.7.1 The policy and accompanying text relating to HMS Dryad were respectively deleted and altered in the Revised Deposit to reflect the Government announcement that it would close no later than 2011. A later announcement revising the date to 2007 has been inserted by PIC07.04. I consider this appropriately updates the Plan in light of events.
- 7.7.2 English Heritage questions whether E6 and E7 should specifically require an assessment of heritage features within these named sites. However, E7 has been deleted and I have recommended deletion of E6 above. Moreover, heritage features associated with these premises are mentioned in the text and I am satisfied that other Plan policies adequately address issues concerning this topic.
- 7.7.3 Finally, the requests to reinstate the policy and some of the former text relating to safeguarding of land for possible expansion (Commanders Field) and construction of a link road are rejected by the Council as they were intended to meet the needs for the former establishment at HMS Dryad. As that use no longer exists, consideration of any requirements for future uses for the site should be made in the light of Local Plan policies.

## **RECOMMENDATION**

- 7.7.4 That the Plan be modified in accordance with PIC07.04