

Winchester District Local Plan Review
Analysis of Representations on the Revised Deposit Plan

Issue: 7.1 (Deposit 7.3)

RD07.01

Employment Strategy;
Paragraph 7.8

Representations:

Objections:

Cala Homes (South) Ltd. (468/12)

Objects to the distinction between the West of Waterlooville MDA and the Winchester City North MDA. The Local Plan only 'gives consideration to...' the Winchester City North MDA and thus does not follow the Structure Plan Policy MD1 which treats both sites equally and suggests provision for employment uses on both sites.

Change sought – none

Westbury Homes (Holdings) Ltd (469/2, 469/4)

Object to the proposed wording of the paragraph at 7.8 as it is vague and fails to clearly identify the extent of employment in the North Winchester MDA.

Change sought- Include additional employment land other than at the North Winchester MDA to meet with the economic needs of the District over the plan period, such as land at Lovedon Lane and Basingstoke Road, Kings Worthy, with appropriate changes to Proposals Maps.

Mrs G Payne (863/2)

The provision of an appropriate level of employment development within the Waterlooville MDA, together with the other elements of the employment development set out at 7.8 will not be sufficient to meet the District's legitimate requirements for employment land provision.

Change sought – Table 4: Sites Allocated for Mixed Use Including Employment to include a reference to a 10,000m² business development at Pitt Manor.

City Council's response to representation

As a result of representations on the Deposit Plan a change was proposed to include an additional bullet point which states; 'Making provision for appropriate levels of employment development within the West of Waterlooville Major Development Area and giving consideration to the possible need for employment provision as part of the MDA at Winchester City (North), if this development is needed'.

The Winchester City (North) MDA is a 'reserve' housing allocation and will only be released for development if there is compelling need. As such, the Winchester City (North) MDA is not as extensively documented in the Local Plan by comparison to the West of Waterlooville MDA which has had in-depth work completed on it and will be the primary site for MDA development. However, consideration has been given to employment provision as indicated in Proposal NC.3 and this is considered adequate given the 'reserve' status of the MDA.

Westbury Homes (Holdings) Ltd requests that the land to the North East of Lovedon Lane (Lovedon Lane) and land to the South West of Lovedon Lane (Basingstoke Road) be included as additional employment land, to meet the economic needs of the District in the event of the reserve MDA (Winchester City (North)) not being activated which, it is claimed, would result in a shortfall of employment land. The Review of Employment Policies undertaken as part of the preparation of the Local Plan indicated adequate employment land would be available during the Plan period. The sites identified in the Local Plan will satisfy anticipated demand for employment sites. Further, the sites at Basingstoke Road and Lovedon Lane should remain subject to countryside policies, which would help maintain their contribution to the setting of Kings Worthy and the maintenance of a gap between Kings Worthy and Abbots Worthy.

With regard to the objection made in respect to Pitt Manor and the inclusion of this site into table 2 'Sites Allocated for Mixed Use', this issue was addressed in the previous 'Representations on the Deposit Plan'. Further, it is anticipated that the sites identified for employment use will satisfy the expected demand. Development of the site identified by the respondent, would involve a major intrusion into attractive countryside designated as an Area of Special Landscape Quality in the current Local Plan.

Change Proposed – none.

Winchester District Local Plan Review
Analysis of Representations on the Revised Deposit Plan

Issue: 7.2 (Deposit 7.5)
RD07.03
(Proposal E.1)

City Council's response to representation

Support for the amendment to criteria (i) is welcomed.

Change Proposed – none.

Representation:

Support/resolved/withdrawn:

John Hayter (138/6)

Withdrawn objection and/or support changes made.

Change sought – none.

Issue: 7.3 (Deposit 7.5)
RD07.04
(Proposal E.1)

City Council's response to representation

The respondent requested (at the Deposit Plan stage) that paragraph 7.15 be deleted and replaced with the wording suggested. The general intent of the respondent's suggested wording was included into RD07.04, which the respondent welcomes, although the respondent questions why the reference to sustainability was omitted. It is not recommended that the paragraph be amended again as the criteria set out in Proposal E.1, are aimed at ensuring that any development is sustainable.

Representation:

Objection:

John Hayter (138/10)

The wording suggested in RD07.04 does not refer to the need to be sustainable. Object to the reference to 'it may be necessary to impose'.

Change sought - Replace 7.15 with suggested wording in representation.

The respondent is also concerned with the adoption of the wording of paragraph 7.14. The respondent requested that the wording include the word 'exceptional' rather than 'it may be necessary to impose'. It is considered that the wording adopted in the Revised Deposit Plan is sufficient as the intent of the wording proposed by the respondent is reflected in the text, although worded in a user-friendly manner.

Change Proposed – none.

Issue: 7.4 (Deposit 7.8)
RD07.05
(Proposal E.2)

City Council's response to representation

Support is welcomed.

Representations:

Support/Resolved/Withdrawn:

**Cadbury Schweppes Plc. (260/1),
Fareham Borough Council (1423/2)**

Withdraw objections to the Deposit Plan following the changes made. (Interpreted as support for changes made to the RD number written above).

Change Sought - None

John Hayter (138/9)

Withdrawn objection to the deletion of criterion (iii)

Change sought - none

Respondent 2312 objects to the deletion of criterion (iii) of Proposal E.2 and states that the redevelopment of employment sites for other purposes is essential in achieving a more sustainable development framework. Similarly, respondent 325 states that the policy should incorporate greater flexibility to allow for alternative uses when the preferred use is not forthcoming. Criterion (iii) was deleted from the Local Plan as it could allow for housing to replace employment sites in many of the rural locations which would be counter productive to the Proposal's aim. Criterion (iii) is also a difficult matter to measure therefore could possibly cause uncertainty.

The policy structure in the Revised Local Plan is aimed to provide for housing and other amenities within existing communities or within proposed MDAs. Therefore, the Plan discourages the use of existing employment sites for other uses. However, the Proposal does not intend to completely disallow changes of use as it allows for exceptions to be made where the need for the proposed use outweighs the need for retention of the existing use (Proposal E.2 (ii)).

Objections:

**Kingfisher Housing Association
(2312/25)**

The deletion of criterion (iii) is inappropriate and conflicts with Government guidance. The redevelopment of employment sites for other purposes, including residential and

Clearly there are conflicting views on this issue. It is recommended that the Plan retain the amended text in the Revised Deposit Plan, as the reasons behind this change are well-founded. However, it should be noted that there is currently a consultation paper published by the ODPM seeking comments on a revision to PPG3. In view of the conflicting representations on this subject, it will be necessary for the Local Plan Inspector to consider the issue, whatever the Council's

Winchester District Local Plan Review
Analysis of Representations on the Revised Deposit Plan

mixed-use, is essential in achieving a more sustainable development framework and to make the best use of land.

Change sought - *the wording should create a positive framework for the redevelopment of appropriate employment sites for residential and mixed use schemes. This should include the re-introduction of the third bullet point.*

B & Q PLC (325/1)

Strongly suggest that the policy should incorporate greater flexibility to allow for alternative uses when the preferred use is not forthcoming.

Change sought - Add criteria to the proposal.

decision. In view of the uncertainty about the outcome of the current proposed revisions to PPG3 at present, no change should be made to the Plan at this stage.

Change Proposed – none.

Issue: 7.5 (Deposit 7.8)
RD07.06 and RD07.07
(Proposal E.2)

Representations:

Support/resolved/withdrawn:

GOSE (261/25)

Support the changes in RD07.06.

Change sought-*none.*

Objections:

Kingfisher Housing Association
(2312/26)

The deleted paragraph 7.19 should be reinstated.

Change sought-*Reinstate paragraph 7.19.*

City Council's response to representation

The support is welcomed.

The deletion of paragraph 7.19 is a consequential amendment as a result of deletion of criterion (iii) of Proposal E.2. See response to Issue 7.2 above.

Change Proposed – none.

Issue: 7.6 (Deposit 7.8)
RD07.08
(Proposal E.2)

Representation:

Support/Resolved/Withdrawn:

Fareham Borough Council (1423/2)

Withdraw objection to the Deposit Plan (Deposit Plan 1432/2/DEPOS), following the changes made. (Interpreted as support for the RD number listed above.)

Change sought-*none.*

City Council's response to representation

Support is welcomed.

Change Proposed – none.

Issue: 7.7 (Deposit 7.9)
RD07.08
(Proposal E.2)

Representations:

City Council's response to representation

Paragraph 7.20 details the stance that the Plan will employ whilst considering applications to develop existing employment sites into another use. For sites in the countryside it states that 'the loss of employment sites and premises to residential use would not be

Winchester District Local Plan Review
Analysis of Representations on the Revised Deposit Plan

Objections:

**Kingfisher Housing Association
(2312/27)**

In some cases rural sites may be most appropriately served by continuing their employment usage, but policy RD07.08 should also acknowledge that in some instances redevelopment for a residential or mixed use is more appropriate.

Change sought—delete RD07.08.

**South Coast Fencing (manufacturing)
Ltd. (2207/02)**

The meaning of 'low-intensity use' in RD 07.08 is vague and for lost employment sites 'in the countryside' there might be more appropriate uses than low-intensity and agricultural uses, especially if there is existing residential use.

Change sought – remove the amendment to the end of paragraph 7.20.

appropriate and low-intensity or agriculture-related uses may be the only acceptable option if employment sites cannot continue in their existing use'. Any application to develop an employment site will be assessed on its merits and exceptions can be made where the need for the proposed use outweighs the need for retention of the existing use, as detailed in Proposal E.2 (ii). However, in the countryside, as the last paragraph states, low-intensity or agriculture-related uses may be the only acceptable option especially given the strong presumptions against housing development in the countryside. The stance of the Plan in relation to development in the Countryside can be seen through paragraph 4.4 of the Countryside and Natural Environment chapter, which states, 'only essential new development will be permitted within the area defined as countryside'.

Representation 2207 is concerned with the vagueness of the word 'low-intensity use' and is concerned that there might be more appropriate uses than low-intensity and agricultural uses, especially within existing residential uses. If an existing employment use site were proposed to have a change of use, it is appropriate to control the scale and intensity of the redevelopment given the need for strict control of development in the countryside. If the site was already in residential use, E.2 would not apply and replacement housing would in principle be acceptable.

Change Proposed – none.

Issue: 7.8 (Deposit 7.15)

RD07.10
(Proposal E.4)

Representations:

Objections:

**Heron Land Developments Ltd. (204/2)
and Bovis Homes Ltd. (205/2)**

Object to RD 07.10 because it does not permit office development outside the defined town centre of Winchester or the built-up area of Winchester, even under exceptional circumstances. This causes a lack of clarity with RD12.62, which states that up to 6 hectares of employment land will be needed in the MDA.

Change sought—revise RD 07.10 to accord with the provision made for office employment in Winchester in RD 12.62.

**Kingfisher Housing Association
(2312/28)**

The revised wording of the policy restricts the scope for considering redevelopment proposals that involve land uses other than employment.

Change sought—amend wording to reflect above objection.

City Council's response to representation

A representation, raising the same issues as respondents 204 and 205, was responded to in Issue 7.15 of 'Representations on the Deposit Plan'. However, in brief, Proposal NC.3 allows for appropriate employment development within the MDA. The proportion of employment land required for Office Development within the MDA has not yet been determined. For further information on the MDA employment land, refer to the responses on Chapter 12 'New Communities'.

In regard to the Kingfisher Housing Association, Proposal E.4 restricts office development outside the town centre and would therefore provide for residential development. The Proposal sets out where office development may be exceptionally permitted and it does not deal with uses other than office use. The respondents' objection is therefore not relevant to Proposal E.4.

Change Proposed – none

Issue: 7.9 (Deposit 7.16)

RD07.11
(Paragraph 7.32)

Representation:

City Council's response to representation

The content of Paragraph 7.32 (RD07.11) has been incorporated within Proposal E.4. The wording concerned is therefore retained within the Plan and has been given more emphasis by its inclusion within Proposal E.4.

Winchester District Local Plan Review
Analysis of Representations on the Revised Deposit Plan

Support/resolved/withdrawn: *Change Proposed – none*

GOSE (261/26)

Support the changes in RD07.11.

Change sought–none.

Objection:

Kingfisher Housing Association

(2312/29)

This paragraph should be reinstated and revised to allow the redevelopment of employment sites in appropriate locations.

Change sought - amend wording to reflect above objection.

Issue: 7.10 (Deposit 7.20)

RD07.13

(Paragraph 7.46 – HMS Dryad, Southwick)

Representations:

Support/Resolved/Withdrawn:

Southwick and Widley Parish Council

(2105/1)

Supports the proposal to retain many historic features of the site.

Change sought –none.

Objection:

Defence Estates (2280/1)

Although as of 2007 at the latest the HMS Dryad site will no longer be used as a Royal Naval Training School, a review is still to be undertaken, as is usual MOD procedure, to see whether there will be other MOD or Government Department uses for the site. Thus it is incorrect to state that the site will be surplus to MOD requirements.

Change sought –amend the first sentence of RD 07.13 to read: 'The Ministry of Defence has announced that HMS Dryad will become surplus to Royal Navy requirements and will close as a Naval training school by 2007 at the latest.'

City Council's response to representation

The support from 1197 is welcomed in respect to the insertion of RD07.14.

With respect to respondent 2280, it is recommended that the change sought be accepted so as to show the correct information regarding the Dryad site.

Change Proposed – 1st sentence of Paragraph 7.46

The Ministry of Defence has announced that HMS Dryad will become surplus to Royal Navy requirements and will close ~~by 2011 at the latest~~ as a Naval training school by 2007 at the latest.

Issue: 7.11 (Deposit 7.20)

RD07.15-RD07.17

(Proposal E.6 (previously E.7))

Representations:

Objections:

Southwick and Widley Parish Council

(2105/2)

Object to the deletion of the policy to create accesses to the HMS Dryad site

City Council's response to representation

The responses on the Deposit Plan Representations concluded that a reference to the possible need for a bypass is premature without knowing whether any future uses of the site would justify a bypass or indeed whether one would be appropriate.

The reservation of the land at Norton Road/Boutler Road was to meet the needs of the existing establishment at HMS Dryad. It is a countryside site, which should not be developed unless an overriding need is proven. As HMS Dryad is to close, the reservation of the site for related development should be deleted.

Winchester District Local Plan Review
Analysis of Representations on the Revised Deposit Plan

from Boulter Land and Priory Road North, *Change proposed – none*
even though the site is no longer
expanding.

Change sought –none.

Defence Estates (2280/2)

Object to the deletion of this proposal to retain land between Norton Road and Boulter Road for expansion of HMS Dryad. Although the site will no longer be used as a Royal Naval Training School, the future use of the site is not yet determined and it is possible that this land will still be required by the MOD or another government user.

Change sought – reinstate policy E.7.