

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

CHAPTER 7: EMPLOYMENT

Summary of Representation.
Change sought.

City Council's Response to Representation
Change Proposed

Issue 7.1 Chapter 7 - General

Representation:

Sparsholt College (353/17)

The Plan acknowledges that 'employment in the District is concentrated in the service sector, especially public services'. The MoD therefore has special provision to facilitate development.

A similar provision on a relative scale should be made for Sparsholt College which may otherwise be precluded from suitable essential development by countryside policy limitations.

Change sought - add sustainable educational campus status for Sparsholt College to the policy of necessary employment development.

City Council's Response to Representation

The Plan does include special policies for Ministry of Defence sites. These are carried forward from the current Local Plan, following acceptance by the Local Plan Inspector that the MoD is a special case. Indeed, for operational development the MoD does not require any sizeable permission. This is, therefore, an exceptional provision for development related to armed services operations. It should not be extended generally to other forms of development.

It is not considered that RPG9 guidance relating to sustainability principles, quoted by Sparsholt College, provides justification for future development at the College. Indeed the College is isolated from any sizeable settlement and the facilities and services that such a settlement would offer. However, it is also recognised that Sparsholt College is a large establishment in the countryside, similar in size to some MOD establishments, which may have either legitimate development needs or, conversely, become redundant and need to be reused for other purposes. It would, therefore be appropriate to provide some guidance within the Plan for large institutional establishments such as this.

As these sites are within the countryside, policies restraining additional built development should continue to apply. Indeed, a similar approach to that applying to MOD sites, as set out in Proposals E.5 and E.6, could appropriately be applied. This requires new development to demonstrate an essential need for such a location, to use existing buildings or limited new-build, to produce a full site appraisal and brief for any larger proposals, and to accord with other relevant policies. It is proposed that an additional Proposal and explanatory text be included within the "Existing facilities and services" section of Chapter 8 (Town Centres, Shopping & Facilities) to deal with development proposals at educational establishments in the countryside.

Change Proposed – none (but see also Issue 8.15).

Issue 7.2 Paragraph 7.7

Representation:

County Planning Officer, HCC (1433/8)

Support the methodology used for developing employment proposals, in particular the use of the business survey set alongside statistical analysis. This accords with the Structure Plan (Review) Policy EC.2 and paragraph 151.

Change sought - none.

GOSE (261/38)

Paragraph 7.7 indicates that business/floorspace survey was carried

City Council's Response to Representation

The support is welcomed.

Chapter 12 focuses on provisions for new communities within the District. Of particular relevance are the Major Development Area proposals for West of Waterlooville and Winchester City (North). In both cases the development planning process is at an early stage and detailed guidance on employment land provision, of the kind suggested by GOSE, will come later. The employment provisions proposed in Chapter 12 (at Knowle and West of Waterlooville) are aimed at meeting the needs of the communities proposed, rather than arising from the business survey.

A number of employment or mixed use allocations are made in other settlements (Chapter 13). However, these are aimed at industrial uses, rather than office uses.

The business survey did not show any demonstrable need for office

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

CHAPTER 7: EMPLOYMENT

Summary of Representation. ***Change sought.***

City Council's Response to Representation ***Change Proposed***

out which would appear to accord with RPG9. However the link between the results of the survey and the potential for office development in Chapters 12 and 13 are not clear.

Change sought - not specified.

development in the new communities or settlements, other than Winchester. Such development is not, therefore, specifically allocated, although Proposal E.1 is a permissive policy that would allow office development in these locations. It is not considered necessary to go into further detail within the Plan about the business survey. There are general references to the survey and, following discussion, GOSE have indicated that this is likely to be acceptable.

Change Proposed – none.

Issue 7.3 **Paragraphs 7.8 - 7.13**

Representation:

CPRE, Winchester & Havant Branch (1387/3)

Object to the possible over-allocation of employment land in the light of the low levels of unemployment in Hampshire and the District and the dangers of 'overheating' in the South East.

Change sought - existing approved employment sites should be developed before newly allocated sites are approved. New sites should be controlled by the demand for housing.

GOSE (261/38)

Paragraph 7.8 (first bullet point) refers to carrying over employment sites from the adopted Local Plan. It is not clear if the advice in PPG6 has been complied with, stating that the sequential approach should apply to town centre uses such as offices.

Change sought - not specified.

Havant Borough Council (265/2)

The employment strategy of the Plan should recognise the employment provision proposed for West of Waterlooville MDA and the economic needs of Havant Borough.

Change sought - include a stronger and more explicit reference to employment provision as part of the MDA within the Plan's employment strategy.

CPRE, Winchester & Havant Branch (1387/4)

Object to the over-provision of employment land in Tables 3 & 4. In addition there are allocations of 30ha. at

City Council's Response to Representation

The Local Plan's employment allocations result from various assessments of need and demand, including an Economic Profile, prepared by the County Council, and a business survey. The strategic planning authority has therefore been involved and does take a strategic overview. Indeed, Hampshire County Council has specifically supported the Local Plan's approach to assessing employment needs (see Issue 7.2). In addition the South East England Development Agency's Regional Economic Strategy provides the regional context and should be taken into account.

Apart from the allocations at Whiteley, most of the Local Plan's employment allocations are small areas of land within the District's villages, where there is often a large imbalance between housing and employment. In terms of sustainability, therefore, additional employment would be an advantage and may help to improve the range of local employment.

Similarly, the large employment allocation proposed at West of Waterlooville is aimed at achieving a mixed and balanced development. Apart from being a requirement of the Structure Plan (Review), it is supported by Havant Borough Council, which has identified a strong need for such development and wishes to see it brought forward at the earliest opportunity. The land in the Havant Gap mentioned by respondent 1387 is within Havant Borough and the City Council has no control over its allocation for development. In fact Havant Borough Council seeks a more explicit reference to the importance of the allocation at West of Waterlooville within the Plan's employment strategy. It is accepted that a reference to the employment provision proposed within the MDA would be appropriate, as a new 'bullet point' within paragraph 7.8.

At Whiteley very large allocations at Solent 1 and Solent 2 Business Parks have been carried forward. Both of these areas already benefit from outline planning permission (with some detailed approvals under construction). It would not, therefore, be realistic to 'un-allocate' them, even if this were thought to be appropriate. However, the Local Plan does make it clear that Solent 2, on which development has not currently been commenced, should be phased so that it is not developed until land at Solent 1 is fully committed.

The Solent 1 and 2 Business Parks are identified as 'strategic' sites in Hampshire County Council's annual "Industrial Land and Office Floorspace Supply Annual Monitoring Report". They are one of the few locations in the County of this size and with such a good location

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

CHAPTER 7: EMPLOYMENT

Summary of Representation. ***Change sought.***

City Council's Response to Representation ***Change Proposed***

West of Waterlooville and 2.8 ha. in Denmead, as well as 20ha. in the Havant Gap.

Change sought - the overall employment provision should be examined at a more strategic level to avoid over-provision and fuelling the need for more housing.

Hallam Land Management (354/5)

Endorse the introduction of a more flexible approach to certain sites and their designation as mixed use allocations, but object to the statement in paragraph 7.12 that 'employment use should form the largest proportion of the development'.

Change sought - delete paragraph 7.12.

in terms of access to the motorway network, ports, airport, etc. Such opportunities are felt to be needed as strategic sites, to meet possible needs for major new employment development or relocation, even if they may not be needed in the short term. Retention of these (greenfield) sites for employment use does not sterilise sites that would otherwise be used for housing (a concern frequently raised by CPRE and others) because, even if the sites were suitable for housing, they would only be released towards the end of the site search sequence.

None of the current (1998) Local Plan's sites that have been carried forward are intended for office use other than possibly at Whiteley (Business Parks). An assessment of all employment sites was carried out which took account of sustainability issues. PPG6's sequential approach is not, therefore, relevant to these sites.

Paragraph 7.12 refers to Table 4, which lists four sites allocated for mixed use development, which includes an employment element. Respondent 345 considers the requirement for the greater proportion of development on these sites to be devoted to employment to be too prescriptive. However, most of these sites were previously employment-only allocations and the Plan has, therefore, introduced considerable flexibility. The request to delete paragraph 7.12 would effectively result in these sites reverting to employment-only allocations, removing flexibly rather than adding it.

It is considered that the Plan should continue to include provision for these mixed-use sites and that paragraph 7.12 should therefore be retained. The respondent has also objected to the details of one of the sites specifically and this objection will be considered in more detail in responding to that issue (Settlements Chapter).

Change Proposed – paragraph 7.8:

Add new bullet point (as 3rd bullet).

- *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 a MDA at Winchester City (North), if this development is needed.*

Issue 7.4 **Tables 3 & 4 ('Omission' Sites)**

Representation:

Bishops Waltham Parish Council (211/7)

Object to the lack of proposals to allow new B2 and B8 uses in the District. These should be allowed on the sites in Table 3. There is insufficient flexibility to allow existing uses to expand. The Proposals will allow further creeping change of use from employment.

City Council's Response to Representation

Some of the sites allocated in the Plan and listed in Table 3 do provide for Use Class B2 and/or B8 development (NC.2, West of Waterlooville; S.4, Abbey Mill Bishops Waltham; S.9, Hillsons Road Curdridge; S.22, Little Park Farm Whiteley). The possibility of ancillary warehousing (B8) is mentioned in relation to the Business Parks at Whiteley. Respondent 211 is not, therefore, correct to say that the Plan does not provide at all for B2 or B8 uses. Proposal E.2 also seeks to retain land and buildings already in these uses, unless they are causing problems. No clear evidence has been provided to suggest that the Local Plan makes insufficient provision for these uses and the business survey carried out during the preparation of the Plan did not identify any particular unmet needs. Other studies of business floorspace needs, notably by Roger Tym and Partners for Hampshire County Council in 1999 did not identify any general

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

CHAPTER 7: EMPLOYMENT

Summary of Representation. *Change sought.*

City Council's Response to Representation *Change Proposed*

Change sought - not specified.

shortage of sites. It is therefore concluded that no additional or amended allocations are needed.

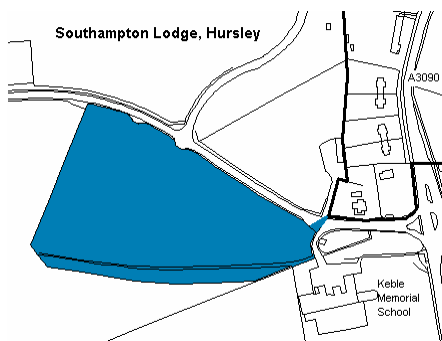
IBM UK Ltd (264/2)

Hursley village policy boundary should be extended to include the Southampton Lodge site, which has permission for the factory to be rebuilt. This is a brownfield site and it is appropriate for it to be included within the village boundary.

The Plan does not preclude expansion of existing employment uses. Any applications to expand B2 or B8 uses would need careful consideration on their merits, taking account of the requirements of other Proposals such as DP.3 and DP.14.

Change sought - the site should be included within the Hursley Village Boundary so it can be developed for residential or employment purposes.

The Plan sets out in paragraph 7.9 the criteria that were used in reassessing whether employment sites should be reallocated to mixed use sites. The aim is to ensure that there is not a general 'creeping change' from employment use and Proposal E.2 would resist such changes unless the use proposed is more suitable taking account of these criteria.



A number of respondents propose that specific sites be allocated for employment and/or mixed use. Where the alternative of residential use is promoted its merits are considered in response to objections to the Housing Chapter (Issue 6).

Although some respondents claim that the Plan makes insufficient provision for employment/business development and that this may harm the District's economy, no specific evidence has been submitted to substantiate these claims. The work undertaken on employment issues in preparing the Plan did not identify a need for further employment land allocations, indeed it concluded that several sites could be re-allocated for mixed use. There is therefore no evidence of any overriding need to allocate more land for employment development and the various 'omission' objections should be considered against this background. Each site is considered below.

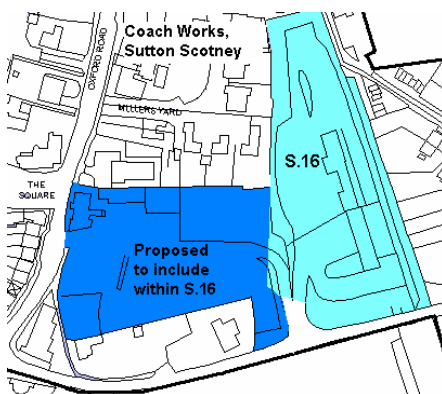
Old Road Securities Plc. (295/1)

Object to the non-inclusion of the Coach Works site, Oxford Road, Sutton Scotney as part of the S.16 mixed use allocation. The Coach Works site and the Station Yard site should be treated comprehensively and provide an opportunity to improve the visual amenity of the conservation area.

Southampton Lodge, Hursley. The Local Plan seeks to avoid extending settlement boundaries (including Hursley). The site is outside the settlement boundary and separated from it by the drive to Hursley Park (IBM). The fact that the site may have been previously developed and may have a partly implemented permission for B2 or B8 use does not justify extending the settlement boundary. The permission was granted in replacement for a previously existing building and it is considered appropriate that development should be limited to what is already permitted. No change to the settlement boundary is proposed.

Change sought - extend the Proposal S.16 mixed business and residential development to include the adjacent Coach Works site.

Coach Works, Sutton Scotney. This site is within the settlement boundary of Sutton Scotney and employment development is, therefore, appropriate in principle, as provided for by Proposal E.1. The site is quite large and employment-only development may result in more employment provision than would be appropriate for this small settlement and in traffic terms, when taken with the adjoining S.16 allocation for mixed use. A mix of uses, including some housing, may therefore be appropriate and lead to an improvement in the local environment, which is within the conservation area. There may also be benefits in considering the objection site comprehensively with the S.16 site in terms of design, access, mix of uses and provision of facilities/services. It is, therefore, accepted that there would be merit in including the objection site as part of the S.16 mixed use allocation and Proposal S.16, the Proposals Map and Table 4 should be



Winchester District Local Plan Review

Analysis of Representations on the Deposit Plan

CHAPTER 7: EMPLOYMENT

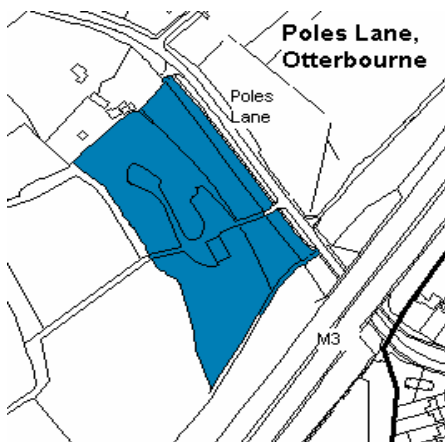
Summary of Representation. *Change sought.*

City Council's Response to Representation *Change Proposed*

St Michaels Development Co. (415/2)

Table 3 is not comprehensive and does not identify sufficient employment sites to meet the needs of the District. The sites in Table 3 do not accord with the Structure Plan, which requires a reasonable range of types and sizes of sites in a variety of locations, nor PPG13 which advocates employment close to where people live.

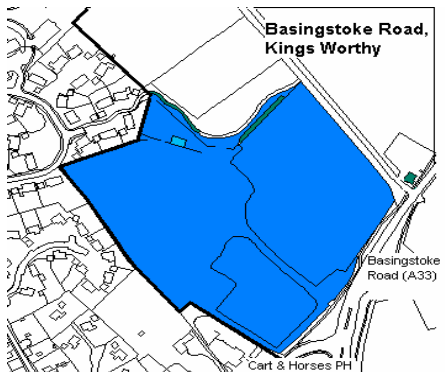
Change sought - amend Table 3 to include land at Poles Lane Otterbourne.



Westbury Homes (Holdings) Ltd. (469/7)

Object to the failure of the Plan to identify sufficient employment land, which could result in constraints on the local economy, contrary to PPG4. Land at Basingstoke Road, Kings Worthy should be allocated for employment purposes.

Change sought - allocate land off Basingstoke Road, Kings Worthy for employment and include in Table 3.



amended accordingly.

Poles Lane, Otterbourne. The site is outside the settlement boundary of Otterbourne, separated from the village by undeveloped land and the M3 motorway, which is on a substantial embankment at this point. Some buildings on the site have changed from agricultural to business use following a consent in 1996. The fact that these rural buildings have permission, or are in use for, business purposes does not mean that the whole site (of 1.6 hectares) is suitable for allocation for industrial purposes. Such an allocation would lead to a considerable increase in built development in a location that is clearly part of the countryside and separated from the built-up area of Otterbourne. Whilst the objector accuses the Local Plan of not providing employment where people live (as advised by PPG13) the Local Plan's employment allocations are within the larger defined/proposed settlements, not separated from them in the way that this objection site is. The Highway Authority advises that the position of the site access would need to be resolved and that there is a lack of public transport. Also footway and cycle provision will be required.

It is therefore proposed that the objection site should not be allocated for development or included in the Otterbourne settlement boundary.

Basingstoke Road, Kings Worthy. This site is outside the settlement boundary of Kings Worthy, to the north of the Cart and Horses Public House. The Local Plan proposes that this area should be retained as part of a Local Gap between Kings Worthy and Abbots Worthy. The site is partially wooded (subject to a Tree Preservation Order) and includes higher quality agricultural land. It was promoted for housing development by objectors at the last two local plan inquiries. The previous Local Plan Inspector concluded that the site should remain subject to countryside policies, which would help maintain its contribution to the setting of Kings Worthy and the maintenance of a gap between Kings Worthy and Abbots Worthy. It is considered that there are no reasons to depart from that conclusion and the land should not be allocated for development or included within the Kings Worthy settlement boundary.

Durley Brook Farm, Durley. This land is outside the defined development frontages of Durley and to the rear of Durley School (the front of which is in a defined frontage). It shares an access with the School and the objector suggests it could help provide a school playing field. Whilst the objector suggests it is rundown and needs investment this may be true of many farm holdings/buildings and does not justify allocating them for development (whether housing, employment or a mix as suggested by the respondent). Also, this is a large site with a constrained access, the development of which would intrude into the countryside and not reflect the development pattern of Durley. It should not be allocated for development or included in a development frontage.

Bells Ground Farm, Lower Slackstead; Wolfhanger Farm, Bramdean Common; Lycroft Farm, Upper Swanmore. All of these sites are in remote countryside locations completely isolated from any defined settlement and with poor access. Wolfhanger Farm and

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

CHAPTER 7: EMPLOYMENT

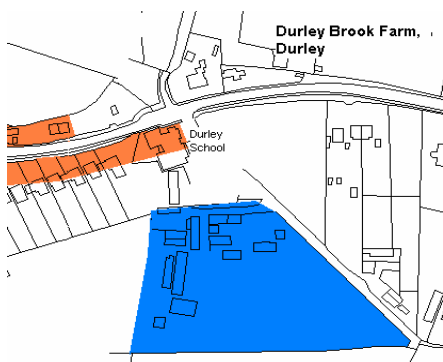
Summary of Representation. *Change sought.*

City Council's Response to Representation *Change Proposed*

J Brewer (479/2)

Object to the non-allocation of Durley Brook Farm for business use or a mix of commercial and housing. The farm has become rundown and is well related to the settlement of Durley.

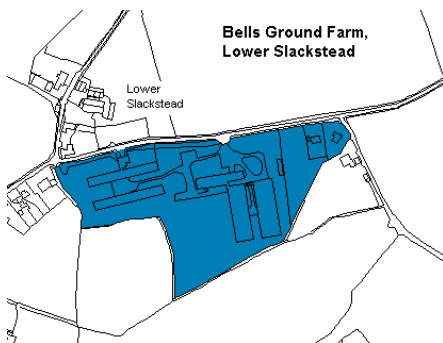
Change sought - allocate land at Durley Brook Farm for employment or mixed use.



Humphrey Farms Ltd. (499/1)

Object to the failure to allocate land at Bells Ground Farm, Lower Slackstead for employment or mixed housing and employment use. This would enable the removal of the existing buildings, improving the appearance of the site.

Change sought - allocate land at Bells Ground Farm, Lower Slackstead for employment or mixed housing and employment use.



Humphrey Farms Ltd. (499/2)

Object to the failure to allocate land at Wolfhanger Farm, Bramdean Common for employment or mixed housing and employment use. This would enable the redevelopment of the existing buildings,

Lycroft Farm are within the East Hampshire Area of Outstanding Natural Beauty. Whilst the objectors suggest they are in need of diversification or investment this may be true of many farm holdings/buildings and does not justify allocating them for development. The Local Plan's policies provide an appropriate basis for considering future proposals for such sites and it would be totally inappropriate to allocate them for development, whether employment or mixed use. No change is proposed to the Plan in response to these objections.

Pitt Manor, Winchester. This site is outside the settlement boundary of Winchester, adjoining the built-up area, to the south-west of Kilham Lane. The respondent suggests that a large area be allocated for housing, employment, park and ride, etc development. The site is on a ridge of high ground within an area of countryside designated as an Area of Special Landscape Quality in the current Local Plan. Contrary to the respondent's assertions, it is concluded that development of the site would involve a major intrusion into attractive countryside. In any event, no overriding case has been made for such development and the Plan should not be amended in the way suggested by the objector.

Winchester City (North) MDA. The development planning process is at a very early stage at Winchester City (North). Any development in that area would only be considered if, in the future, a compelling justification for additional housing was identified by the strategic planning authorities (Hampshire County Council, Southampton City Council and Portsmouth City Council).

However, the question of whether or not employment provision should be made within the potential MDA could affect the land requirements and therefore the exercise of refining the development area and Local Plan allocation. The work undertaken so far on employment and business needs has not identified a need for any significant provision at Winchester City (North). Indeed, one of the main considerations for the Structure Plan Examination in Public Panel, when recommending inclusion of an MDA at Winchester, was the imbalance in employment and housing in Winchester. The indications are, therefore, that no significant employment provision will be needed, but this conclusion would need to be reviewed if and when any compelling justification for the development is identified.

The changes proposed to paragraph 7.8 of the Plan (see Issue 7.3) include reference to the employment needs of the MDAs. It will be possible to assess these needs more accurately once the results of the 2001 Census are available, taking account of up to date information on work and commuting patterns. As the MDA is a reserve site and the need for it to be brought forward has not been identified, it is not considered necessary to undertake this assessment at this stage.

Change Proposed – amend Table 4 (page 66):

....Station Yard,
Sutton Scotney S.16 1.60Ha....

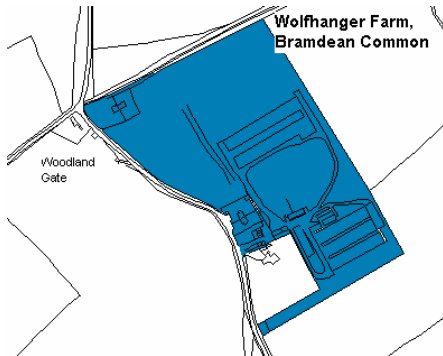
Winchester District Local Plan Review
Analysis of Representations on the Deposit Plan

CHAPTER 7: EMPLOYMENT

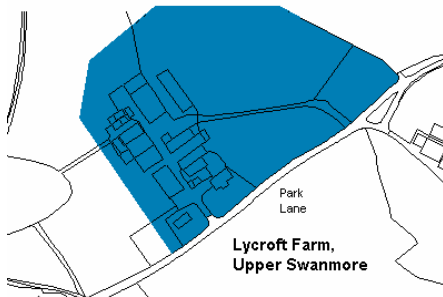
Summary of Representation.
Change sought.

City Council's Response to Representation
Change Proposed

improving the appearance of the site.
Change sought - allocate land at
Wolfhanger Farm, Bramdean Common
for employment or mixed housing and
employment use.



F G Stephens & Sons (539/1)
Object to the omission of Lycroft Farm,
Upper Swanmore as an industrial
allocation. There is a need for
diversification and the site should be
allocated to allow a comprehensive
development.
Change sought - allocate land at Lycroft
Farm, Upper Swanmore for industrial
use.



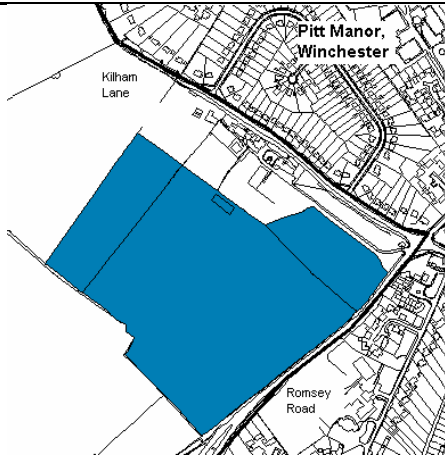
G Payne (863/2)
The Local Plan makes insufficient
provision for housing and employment
land. Land at Pitt Manor, Winchester
should be allocated for mixed housing,
employment and other uses.
Change sought - allocate land at Pitt
Manor, Winchester for mixed use
development, including employment (up
to 10,000 sq.m.).

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

CHAPTER 7: EMPLOYMENT

Summary of Representation.
Change sought.

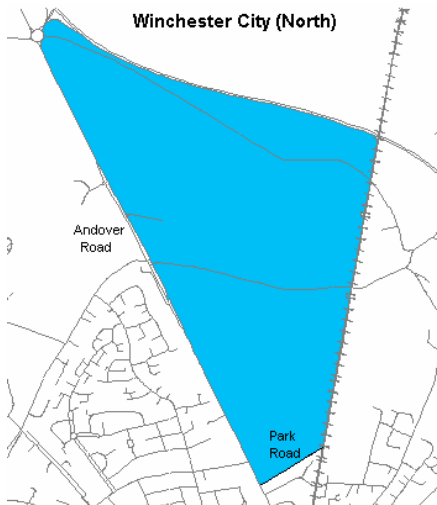
City Council's Response to Representation
Change Proposed



CALA Homes South Ltd (468/43)

Object to the failure of the Local Plan to consider the need for employment and/or mixed use development at Winchester City (North) as part of the MDA. It is a Structure Plan requirement that such needs be established through the Local Plan process.

Change sought - undertake an assessment of employment needs and amend the Plan if necessary.



Issue 7.5
Proposal E.1

Representation:

J Hayter (138/7), Bishops Waltham

City Council's Response to Representation

As noted in response to Issue 7.4, the Plan does provide for Use Class B2 and/or B8 development on some of the allocated sites. However, the respondents are right that, if strictly interpreted, there is nothing in the Local Plan's general proposals that permits the development or expansion of B2 or B8 uses. Whilst care is needed

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

CHAPTER 7: EMPLOYMENT

Summary of Representation. ***Change sought.***

City Council's Response to Representation ***Change Proposed***

Parish Council (211/8)

The Plan should be more flexible towards business use by allowing B2 and B8 uses. Proposal DP.3 would control any harmful effects of such uses and environmental legislation is also available.

Change sought - amend Proposal E.1 so that it includes B2 and B8 uses, amend criteria and explanatory text (detailed wording suggested).

due to the potential impact of such uses, a blanket resistance of these classes of development is not justified.

It is, therefore, proposed that Proposal E.1 should be modified to include reference to B2 and B8 uses, as proposed by the respondents. However, it is considered that the Proposal's existing criteria should be retained rather than being deleted/replaced as proposed by the respondents. It is considered that the existing criteria provide adequate and necessary safeguards and requirements. The respondents suggest that a new criterion should be added requiring that employment uses comprise at least 55% of the sites in Table 4 of the Plan, but it is considered that the Plan already provides adequate guidance on this aspect, in paragraph 7.12 and Proposals S.7, S.14, S.16 and S.17.

The respondents also propose additional explanatory text, to acknowledge the importance of business development/expansion and referring to the requirements of Proposal DP.3. Changes are required to paragraph 7.14 as a consequence of the proposed changes to E.1, although it is not proposed to adopt the precise wording proposed by the respondents.

Change Proposed – Proposal E.1:

....(i) it falls within Classes B1, B2 or B8 of the Use Classes Order (but in Winchester, see Proposals E.3 & E.4);....

Change Proposed – Paragraph 7.14:

Small-scale employment development falling within Use Classes B1 (offices, research and development, and light industry), B2 (general industry) or B8 (storage or distribution) can normally often be accommodated in the settlements. Such development is important for businesses seeking to adapt and expand, but account needs to be taken of the possible harmful effects, particularly of B2 or B8 uses. It may be necessary to impose conditions to ensure that the requirements of Proposal E.1 and other relevant Proposals such as DP.3 and DP.13-DP.15 can be met, for example relating to noise and working hours. However, in Winchester office development requires more strict control in order to ensure that it does not create pressures which would harm the special character of the town, and to avoid imbalances in the employment structure being exacerbated. Therefore, Proposals E.3 and E.4 ~~override the provisions of Proposal E.4~~ apply in Winchester.

Issue 7.6 **Proposal E.1**

City Council's Response to Representation

See response relating to Winchester City (North) under Issue 7.4.

Representation:

Change Proposed – none.

CALA Homes South Ltd (468/41)

Object to the failure of the Local Plan to consider the need for employment and/or mixed use development at Winchester City (North) as part of the MDA. It is a Structure Plan requirement that such

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

CHAPTER 7: EMPLOYMENT

Summary of Representation. ***Change sought.***

City Council's Response to Representation ***Change Proposed***

needs be established through the Local Plan process.

Change sought - undertake an assessment of employment needs and amend the Plan if necessary.

Issue 7.7 **Proposal E.1**

Representation:

Hawthorne Kamm Ltd. (374/14)

Proposal E.1 is too restrictive and should allow brownfield sites outside settlements to be developed. Brownfield sites within settlements may not be accessible by public transport but should also be considered.

Change sought - include reference to brownfield sites within and outside settlements.

Clients of Southern Planning Practice Ltd. (475/6)

Farm buildings on the edge of villages should be counted as previously developed land and permitted for housing in preference to employment.

Change sought - not specified.

Stenoak Associated Services (536/1)

In some situations unsuitable uses are established within villages and should be removed from close proximity to housing. To retain local firms and secure redevelopment within an acceptable timescale land should be released in the countryside and an additional policy to allow this to happen is needed.

Change sought - include new policy to allow for relocation of firms with strong local connections to sites close to the settlement (detailed wording suggested).

P A Warner (1249/20)

Proposal E.1 would not allow new rural-based employment proposals outside H.2/H.3 boundaries. In Micheldever it would be impossible to create employment opportunities within the settlement boundaries but there could be opportunities in former agricultural buildings (examples given).

Change sought - include an additional

City Council's Response to Representation

PPG3 gives a definition of 'previously developed land' (PDL), which is the most up-to-date and widely used (PPG3, Annex C). Although PDL may be found in built-up and rural areas, the definition specifically excludes agricultural or forestry buildings and land where the remains of any structure have blended into the countryside over time. It is not considered appropriate for the Local Plan to attempt to introduce its own definition of PDL when a clear definition is given in Government guidance.

Proposal E.1 does allow PDL to be developed for employment purposes in the settlements ('brownfield sites' are not defined in PPG3). The requirement for accessibility by public transport is considered appropriate given Government and strategic advice. Farm buildings can be converted for employment use within the terms of Proposal C.16, subject to appropriate criteria. However, it would not be appropriate to indicate a preference for housing rather than employment, given Government advice and the Local Plan's strategy.

This issue is dealt with more fully in response to objections to Proposal C.16. Similarly, the issue of whether rural sites should be developed/redeveloped for employment purposes is dealt with in response to objections to the Countryside Chapter. It is concluded that it would be appropriate to introduce a policy allowing for such development (see Issue 4.33).

Proposal DP.14 may allow for the relocation of uses which are causing particular environmental problems in their existing location. However, given the aims of the Plan's countryside policies it would not be appropriate to provide for relocation from a settlement to a countryside site except in exceptional circumstances. The Plan's existing policies could facilitate such development (e.g. C.16, DP.13). However, a policy of the kind suggested would encourage commercial development in the countryside on the edge of settlements, contrary to Government and strategic policy aims to contain development within village boundaries.

Each village has a defined settlement boundary within which development can be considered, and outside which it is generally resisted. It is not accepted that it will necessarily be impossible for employment development to take place within the boundaries of Micheldever or any other settlement. In any event, Proposal C.16 allows for the reuse of former agricultural buildings for employment use.

Change Proposed – none.

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

CHAPTER 7: EMPLOYMENT

Summary of Representation.
Change sought.

City Council's Response to Representation
Change Proposed

proposal referring to situations outside settlement boundaries.

Issue 7.8 **Proposal E.2**

Representation:

Cadbury Schweppes Plc (260/5)

Support the Plan's intention to prevent the loss of existing employment land to other uses.

Change sought - none.

M Miller (1252/2)

Support Proposal E.2. Agree with the need to re-evaluate employment sites to enable housing development on brownfield sites.

Change sought - none.

County Planning Officer, HCC (1433/8)

Support Proposal E.2 and the Plan's intention to prevent the loss of employment land to other uses.

Change sought - none.

J Hayter (138/8), Bishops Waltham Parish Council (211/9)

Brownfield employment land is a finite non-renewable resource and should not be lost. If the situation envisaged by E.2 (i) and (iii) arose it should be dealt with as an exception to policy.

Criterion (iii) could allow housing to replace employment in many of the more rural locations and is strongly counter productive to the proposal's aims.

Change sought - delete E.2 (i) and (iii).

Heritage Commercial Properties (203/1)

Object to Proposal E.2, as it applies to Winchester. The policy is not based on a market analysis of the need for employment land, in combination with Proposal E.4 it sterilises land in B2 and B8 use and similar policies in the adopted Local Plan have been applied inconsistently.

Change sought - delete Proposal E.2.

B&Q plc (325/1)

Proposal E.2 should incorporate greater

City Council's Response to Representation

The support is welcomed.

It is considered that Proposal E.2 would be overly inflexible if criteria (i) and (iii) were deleted, as proposed by respondents 138 and 211. Criterion (i) allows for uses that are causing problems to be removed and the site reused. Although the respondents suggest that this issue has already been taken into account in deciding whether employment allocations should be carried forward, Proposal E.2 does not just deal with allocations. Criterion (i) should, therefore, be retained.

Respondents 138 and 211's fears about employment uses in the countryside being replaced by housing could be well founded. An employment site in the countryside may perform badly against the sustainability criteria referred to in Criterion (iii) and this could be used to suggest that housing should be developed instead. This is not the intention of the policy and housing development may not be a sustainable use either. It is therefore proposed that criterion (iii) should be deleted. The explanatory text accompanying Proposal E.2 would need to be clarified, although it is suggested that reference should still be made to the sustainability criteria in paragraph 7.9 as a factor to be taken into account where relevant.

There is very little vacant industrial and warehousing land in Winchester and a limited number of sites available for such development. The policy aims to contribute to the objective of retaining a balanced local economy that provides a wide range of job opportunities for local people. It is not accepted that the equivalent Proposal in the current Local Plan has been applied inconsistently. The policy does allow exceptions, which have sometimes been made.

Proposal E.2 already provides for exceptions to be made where the need for the proposed use outweighs the need for retention of the existing use. In considering this balance, the take up of the site for employment use may well be a relevant consideration. Criteria (i) and (ii) of E.2 are alternatives and should, therefore, be separated by the word 'or', as suggested by respondent 972. It is proposed that criterion (iii) be deleted (see above), however criterion (iv) is an additional requirement that should be preceded by 'and'.

Respondent 1423 is right to point out that Proposal E.2 does not protect sites allocated for, or with permission for, employment use. The application of the Proposal should be clarified.

Change Proposed – Proposal E.2:

In order to retain and increase the variety and number of employment opportunities in the District, proposals involving the loss (by change of use or redevelopment) of existing sites or premises in lawful use within Use Classes B1, B2 or B8 (or sites permitted or allocated for these uses) will only be permitted where:

(i) the retention or expansion of the existing use would cause overriding environmental or highway objections which the

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

CHAPTER 7: EMPLOYMENT

Summary of Representation. ***Change sought.***

City Council's Response to Representation ***Change Proposed***

flexibility to allow for alternative uses where the preferred use is not forthcoming.

Change sought - include additional criteria to allow redevelopment of employment sites if the supply of employment sites would not be adversely affected.

E Fitzgerald (972/3)

Proposal E.2 is inconsistent with the aim of resolving sites that are causing problems. If all the criteria of E.2 have to be met there will be little scope for radical solutions to problem sites.

Change sought - amend to include "or" between the criteria of E.2.

Fareham Borough Council (1423/2)

Object to Proposal E.2, which does not make it clear that Segensworth North is protected for employment use, as the Plan no longer allocates it for this use.

Change sought – amend E.2 to clarify that sites with consent for employment use are protected (or allocate Segensworth North for employment development).

proposed development would overcome; or
(ii) the Local Planning Authority is satisfied that the need for the proposed development outweighs the benefits of retaining the existing use; and
(iii) the proposed development is more appropriate than continued employment use in sustainability terms;...

Change Proposed – paragraph 7.19:

In assessing development proposals against criterion (iii) of Proposal E.2, the Local Planning Authority will have regard to the factors listed in paragraph 7.9 above. Alternatives to existing employment uses may be permitted where they perform more favourably, having regard to these factors.

Change Proposed – paragraph 7.20:

The loss of existing employment land in Use Classes B1, B2 or B8 will be resisted in order to retain a variety of employment opportunities throughout the District. In order to retain those employment sites that are the most sustainable locations, the factors outlined in paragraph 7.9 of this Chapter may be relevant in assessing will be used to assess the relative merits of existing employment sites and whether they would be more suited to alternative uses. Therefore, the loss of established employment sites, such as those in the main industrial estates, sites in the larger settlements which are reasonably well served by public transport and where there is likely to be some market interest in employment development will be resisted. Conversely, alternative forms of development may be more acceptable on isolated employment sites in small settlements that are poorly served by public transport and located away from the strategic road network. In the countryside, the loss of employment sites and premises to residential use would not be appropriate and low-intensity or agriculture-related uses may be the only acceptable option if employment sites cannot continue in their existing use.

Issue 7.9 **Proposal E.2**

Representation:

Save Barton Farm Group (175/11)

Object to Proposal E.2. Land earmarked for employment far exceeds needs, fuelling inward migration and increasing pressure for housing. Employment sites should not be viewed as a long term resource but should be reassessed.

Change sought - delete Proposal E.2.

C Slattery (176/6)

Surplus employment land has been allocated within the District which could be released for mixed use including housing.

Change sought – release employment

City Council's Response to Representation

See response to Issue 7.3 regarding the over or under-allocation of employment land. Proposal E.2 does not completely rule out the redevelopment of employment sites for other purposes and a reassessment of employment allocations was carried out to inform the Local Plan Review.

See response to Issue 7.4 regarding employment provision at Winchester City (North).

Change Proposed – none.

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

CHAPTER 7: EMPLOYMENT

Summary of Representation. ***Change sought.***

City Council's Response to Representation ***Change Proposed***

land for mixed housing.

Cala Homes (South) Ltd. (468/42)

Object to the failure of the Local Plan to consider the need for employment and/or mixed use development at Winchester City (North) as part of the MDA. It is a Structure Plan requirement that such needs be established through the Local Plan process.

Change sought - undertake an assessment of employment needs and amend the Plan if necessary.

Issue 7.10

Proposal E.2/Paragraph 7.17

Representation:

GOSE (261/40)

Paragraph 7.17 indicates that Proposal E.4 overrides E.2. This creates a hierarchy of policy whereas the Plan should be read as a whole.

Change sought – not specified.

Kris Mitra Associates (289/13)

Proposal E.2 should refer to Proposal DP.16 (contamination). Paragraph 7.17 should take account of other forms of development, such as residential, where commercial uses are causing environmental or highway harm.

Change sought – add a cross-reference to Proposal DP.16 in E.2 (iv).

City Council's Response to Representation

It is accepted that the Plan should not create a hierarchy of policies. However, Proposal E.4 of the Plan resists office development and redevelopment in Winchester, other than in the town centre. The Plan therefore needs to clarify that Proposal E.2 is not intended as a justification for exceptions to Proposal E.4. It is considered that this can be done and the objection met by amending the last sentence of paragraph 7.17.

E.2 (iv) already requires development to accord with other relevant policies (which would include Proposal DP.16) and there is no merit in highlighting one such policy above all others. Proposal E.2 already allows for employment uses to be lost where they are causing overriding environmental or traffic problems. Paragraph 7.17 merely clarifies that even in these cases an alternative employment use is preferred. This does not rule out other forms of development, including residential, and no change is therefore considered necessary.

Change Proposed – paragraph 7.17:

....Alternative employment uses that are more appropriate to these areas will be encouraged. ~~Proposal E.4 applies in Winchester and will override the provisions of Proposal E.2 where any conflict arises. In Winchester, these uses should accord with Proposal E.4, which resists office development outside the town centre.~~

Issue 7.11

Proposal E.2/Paragraphs 7.21-7.23

Representation:

Hydro Agri (UK) Ltd. (259/2)

Paragraph 7.21 should be amended to allow for expansion or redevelopment of employment sites in the countryside (in conjunction with changes to Proposal C.16).

Change sought – detailed wording

City Council's Response to Representation

Most of these respondents have also objected to the countryside policies of the Plan or to the absence of a policy allowing for the expansion or redevelopment of employment sites in the countryside. Paragraph 7.21 merely reflects the Plan's approach to the redevelopment and expansion of business premises in the countryside, as set out in the Countryside Chapter. The issues raised are therefore considered in response to those objections (see responses to objections to Countryside Chapter).

The reference in paragraph 7.23 to resisting the loss of employment sites for housing is included for reasons other than only the employment effects. Government and strategic policies presume against the development of housing in the countryside and brownfield

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

CHAPTER 7: EMPLOYMENT

Summary of Representation. ***Change sought.***

City Council's Response to Representation ***Change Proposed***

change to paragraph 7.21 proposed.

Bryan Jezeph Consultancy (373/1)

The proposal to retain employment uses in the countryside is a sound one but there are often circumstances that mitigate against retention of employment. Some sites cause harm to the amenity of nearby residents (examples given) or may be unsuitable due to traffic levels or HGVs.

Change sought - E.2 should allow such sites to change to residential use.

Clients of Southern Planning Practice Ltd (475/3)

There is a conflict between proposal E.2 and countryside policies. Employment sites in the countryside must be encouraged to modernise, redevelop and expand.

Change sought – not specified.

G Arturi (476/3), J Brewer (479/4), Coil Master Ltd. (487/2), GH Lliftrucks Ltd. (493/1), J Judd (501/3), Nations Farm Ltd. (512/2), Winchester Growers (523/4), F G Stephens & Sons (539/3)

Object to the statement in paragraph 7.21 that expansion or redevelopment of employment sites in the countryside is unlikely to be acceptable. This conflicts with Structure Plan policy and PPG7, is too negative and does not encourage conservation or enhancement of the countryside.

Change sought – change wording to allow for expansion or redevelopment of employment sites in the countryside (detailed wording suggested).

E Fitzgerald (972/4)

Object to Proposal E.2, which is too restrictive of the redevelopment of brownfield sites in the countryside for housing. Housing proposals of this type should be considered on their merits.

Change sought – change paragraph 7.23 so that it only resists loss of employment sites to housing where there is a significant detrimental impact on local employment (detailed wording suggested).

E Fitzgerald (972/5)

Object to proposal E.2, which doesn't

sites in the countryside should not necessarily be treated the same as those within built-up areas. Because of the land values and market demand involved, a more relaxed policy on the redevelopment of employment sites for housing would be likely to result in considerable numbers of employment sites being redeveloped, with harmful effects not just to rural employment and businesses, but also in terms of travel patterns and sustainability.

It is proposed in response to objections to the Countryside Chapter of the Plan that a new Proposal and explanatory text be included, providing for the extension or replacement of employment buildings in appropriate circumstances (see Issue 4.33). This sets out the criteria against which proposals will be judged. In order to reflect this change, an amendment to paragraph 7.22 would be appropriate.

Change Proposed – paragraph 7.22:

....To be acceptable, the proposal should achieve environmental benefits and a more efficient use of the land without materially increasing the amount of built development on the site. The proposal should also meet the requirements of the new proposal (C.xx) in the Countryside and Natural Environment Chapter and the main requirements of Proposal C.16, particularly those that relate to the effect on the locality and travel needs.

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

CHAPTER 7: EMPLOYMENT

Summary of Representation.
Change sought.

City Council's Response to Representation
Change Proposed

sufficiently restrict the redevelopment of business premises in the countryside. The environmental effects of open-air activities on existing dwellings should be taken into account and any source of nuisance should not be moved nearer to existing dwellings.

Change sought - *change paragraph 7.22 to prevent sources of nuisance being introduced, consolidated or moved nearer to dwellings (detailed wording suggested).*

Issue 7.12
Proposal E.3

City Council's Response to Representation

The support is welcomed.

Representation:

See response to Issue 7.4 regarding employment provision at Winchester City (North).

County Planning Officer, HCC (1433/6)

Welcome the Local Plan Review's more flexible approach to office development within Winchester town centre.

Change sought - *none.*

Change Proposed – *none.*

Cala Homes (South) Ltd. (468/81)

Object to the failure of the Local Plan to consider the need for employment and/or mixed use development at Winchester City (North) as part of the MDA. It is a Structure Plan requirement that such needs be established through the Local Plan process.

Change sought - *undertake an assessment of employment needs and amend the Plan if necessary.*

Issue 7.13
Paragraph 7.29

City Council's Response to Representation

The support is welcomed.

Representation:

Proposal E.3 and paragraph 7.29 provide for exceptions to be made where an established local organisation can show a clear operational need for more than 200sq.m. of office floorspace. If the County Council or other organisations can show an essential need for office floorspace this is likely to justify an exception to the policy. Proposal FS.5 also provides for the development of local facilities and services and would allow for the development of land to meet various services' operational requirements.

County Planning Officer, HCC (1433/7)

Support the intention to prevent existing employment land, especially industrial and warehousing, being lost to other uses.

Change sought - *none.*

Estates Practice, HCC (1434/36)

The Plan should recognise the importance of providing essential public service office space in a county town such as Winchester. This appears to

Proposal E.3 and paragraph 7.29 set out a number of criteria that should be met if exceptions are permitted. These relate to the demonstration of a need, the production of a Green Travel Plan, and measures to avoid pressures on the housing market. These requirements are considered fully justified and as the Highway

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

CHAPTER 7: EMPLOYMENT

Summary of Representation. ***Change sought.***

City Council's Response to Representation ***Change Proposed***

have been accepted for MOD land and a section relating to Hampshire County Council and other service provision land use requirements must also be included. Alternatively the issue may be accommodated in relation to Proposal FS.5.

Change sought – not specified.

GOSE (261/41)

A definition of key workers is not provided.

Change sought – not specified.

Authority it would be expected that the County Council would support the requirement for Green Travel Plans. Similarly, given the problems of attracting and retaining key public service workers due to high housing costs (a matter about which the County Council has expressed concerns recently), the requirement to address additional pressures is considered both reasonable and necessary.

The part of paragraph 7.29 referring to 'key workers' concerns contributions required towards the provision of affordable housing or 'key worker' housing for employees where office development greater than 200sq m is proposed within Winchester town centre by an established organisation. No definition of 'key worker' is given because it will be for the organisation promoting the development to assess the housing pressures its proposals would generate and to propose measures to overcome them. These may include provision of affordable housing or housing for key workers, but whether a worker is a 'key worker' will vary with each case. It is not, therefore, considered appropriate to try to define the term more precisely in the Plan.

Change Proposed – none.

Issue 7.14 **Proposal E.4**

Representation:

M Adams (202/1), Heritage Commercial Properties (203/2)

Object to Proposal E.4 which actively promotes the decline of Winchester's economy. Major public sector employers are leaving Winchester (e.g. the Audit Commission and Environment Agency). Proposal E.4 will achieve the opposite of the objective of concentrating employment in the larger 'sustainable' centres. Hampshire County Council's Winchester Economic Profile identifies the supply of office development sites as a threat to Winchester's economic performance. It is only by relaxing the constraint of Proposal E.4 that the lack of supply of office accommodation in Winchester can be remedied.

Change sought - alternative wording for Proposal E.4 suggested:

"Planning applications for office (Use Class B1[a]) development within the Winchester built up area, including new development, extensions, redevelopment and changes of use will be permitted: i) where planning permission is required, the redevelopment or change of use of

City Council's Response to Representation

Proposal E.4 is not promoting the decline of Winchester's economy but seeking to help prevent its overheating and a worsening of the imbalance between employees and resident workers in Winchester, whereby there are substantially more jobs in the town than working residents. This situation adds to skill shortages and encourages commuting, often over long distances. Despite the loss of some significant employers from the town in recent years, there is no evidence to suggest a decline in the local economy. For example, unemployment is extremely low, with recent figures showing that Winchester District has the lowest unemployment rate in Hampshire. Therefore, new office developments may well experience difficulty attracting staff and lead to increased in-commuting. The retail sector also appears buoyant, with the number of vacant shop units being very limited.

Office restraint policies have applied in Winchester for many years with no apparent harm to the Winchester economy. Whilst Winchester's economy may, arguably, have grown further without these restraints, such growth would have increased the pressures the policy seeks to resist: increased housing development, more parking and road provision, etc. Given the importance of conserving Winchester's special environment, and in the absence of any convincing evidence that office restraint has or will harm Winchester's economy, it is concluded that there remains a need to restrain office development in the town.

The Local Plan Review does in fact relax office restraint to allow for small-scale office development in the town centre. This responds to the identification of a need for such development through the business survey. Provision also exists within the town centre for exceptions to policy to allow for larger developments where an established local organisation can demonstrate a need and address the pressures that

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

CHAPTER 7: EMPLOYMENT

Summary of Representation. ***Change sought.***

City Council's Response to Representation ***Change Proposed***

sites or premises used or allocated for non-office use, including Use Classes B1(b), B1(c) and B8;
(ii) the replacement of existing (Use Class B1[a]) office floorspace, subject to the Design and Development Principles of the Plan.

Heritage Property Holdings (323/3)

It is inappropriate to resist the change of use of existing premises within Use Class B1, as this artificially preserves land uses which may no longer be important to the local economy. Given concerns of the Winchester business community over the loss of office floorspace in the City since 1994, resistance to the replacement of existing office floorspace is also inappropriate

Change sought - amend Proposal E.4 to refer to new Class B1a office development on sites in non Class B1 use only.

Hawthorne Kamm Ltd. (374/15)

Proposal E.4 places unnecessary restrictions on business uses and is inconsistent with PPG4.

Change sought – delete Proposal E.4.

such development would bring.

Respondent 202 and 203's proposed new wording would allow for unrestrained office development anywhere in Winchester's built-up area without any measures to address the harmful effects in terms of traffic generation, parking, housing pressures, etc. It would therefore, be likely to be very harmful to the character of the town and it is not proposed that this approach be adopted. It is notable that several of the comments made by the Government Office (GOSE) on the Plan suggest strongly that office development should be required to follow a sequential approach that directs it to main town centres, which is what Proposal E.4 does.

In order to be effective, any office restraint policy must be able to control the change of other uses to office use. The controls over changes of use from other business use classes are therefore necessary and justified.

Proposal E.4 is, in fact, almost identical to Proposal W.10 of the current Local Plan. This policy was adopted after the advice in PPG4, which was considered by the Local Plan Inspector when assessing objections to that policy. The Local Plan Inspector supported the application of this policy, having taken account of advice in PPG4.

Change Proposed – none.

Issue 7.15 **Proposal E.4**

Representation:

Cala Homes (South) Ltd. (468/82)

Object to the failure of the Local Plan to consider the need for employment and/or mixed use development at Winchester City (North) as part of the MDA. It is a Structure Plan requirement that such needs be established through the Local Plan process.

Change sought - undertake an assessment of employment needs and amend the Plan if necessary.

Heron Land Developments Ltd. (204/1), Bovis Homes Ltd. (205/2)

Object to Proposal E.4 which does not permit office development outside the defined town centre of Winchester, contrary to policy MDA1 of the Structure Plan, which requires co-ordinated and

City Council's Response to Representation

The question of whether specific provision for employment should be made within the Winchester City (North) MDA is addressed at Issue 7.4. It is concluded that such provision should not be made at this stage as there is no clear evidence of a need, although the situation should be reviewed when up to date Census information is available on work and commuting patterns in Winchester.

Development of the Winchester City (North) MDA would only be considered if, in the future, a compelling justification for additional housing has been identified by the strategic planning authorities (Hampshire County Council, Southampton City Council and Portsmouth City Council). If that occurs, planning for the MDA will be conducted through production of a comprehensive masterplan (NC.3 (iii)). This will take account of the need for all forms of development within the MDA, which may include provision for appropriate amounts of office or other employment floorspace. Some office development is not, therefore, ruled out if further work in the future indicates that this would be appropriate to meet an identified need or to secure a better employment/housing balance in Winchester.

Change Proposed – none.

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

CHAPTER 7: EMPLOYMENT

Summary of Representation. *Change sought.*

City Council's Response to Representation *Change Proposed*

integrated development of transport, housing, employment, etc in MDAs. The Proposal precludes office employment in the MDA.

Change sought - revise Proposal E.4 to provide for some office development in the Winchester City (North) MDA.

Issue 7.16 Paragraph 7.32

Representation:

GOSE (261/42)

Paragraph 7.32 appears to be aimed at determining planning applications but is not included as a policy.

PPG12 Annex A (para 24) states that the reasoned justification should explain the policies and proposals in the plan, and should not contain policies and proposals which would be used for making decisions on planning applications.

Paragraph 7.32 permits office development outside the town centre. It does not make reference to the advice in PPG6 that the sequential approach should apply to key town centre uses which attract a lot of people, including commercial and public offices.

Change sought - not specified.

City Council's Response to Representation

It is accepted that paragraph 7.32 as drafted in the deposit Plan seeks to set policy rather than explain it and should, therefore, be included within Proposal E.4 itself. This would also provide an opportunity to require that, where a need for office development is demonstrated, the sequential approach is followed.

Change Proposed – Proposal E.4:

Add at end of E.4.

....Where a need for office development is demonstrated, in accordance with Proposal E.3(i), the change of use or redevelopment of an existing employment site outside the town centre may exceptionally be permitted provided criteria (ii) and (iii) of E.3 are met and a sequential search has shown that there are no suitable sites within the town centre available. Any site proposed would need to have good accessibility to public transport and by walking and cycling.

Change Proposed – paragraph 7.32:

~~*Where a local need for office development has been demonstrated, in accordance with Proposal E.3(i), the change of use or redevelopment of an existing employment site outside the town centre may be accepted. Any site proposed would need to benefit from good accessibility to public transport and by walking and cycling.*~~

Issue 7.17 Proposal E.5

Representation:

GOSE (261/43)

Local planning authorities are asked for their comments on Crown Land development, under Circular 18/84. PPG 12 indicates that plan policies are used to determine planning applications so E.5 is unnecessary.

Change sought - not specified.

Ministry of Defence (306/4)

Proposal E.5 is unduly restrictive and increases the prospect of MoD applications for operational development failing to comply with countryside restraint policies and other policies in the Local Plan and therefore having to be

City Council's Response to Representation

It is accepted that the development of Crown land for operational purposes does not require planning permission. However, under the terms of Circular 18/84 Government Departments are required to consult with local planning authorities and this practice has generally resulted in an outcome that has been favourable to all parties. Local authorities may, however, lodge an objection to a proposed MOD development and if the proposal is not changed to overcome the objection the matter is referred to the Secretary of State for a decision. The process is, therefore, not dissimilar to applying for planning permission and it is considered important that the Plan sets out guidance for the MOD in developing its proposals and makes clear the basis on which the local planning authority will respond.

It is, therefore, considered that it is appropriate to retain Proposal E.5 in its current form. The Proposal is in fact based on a similar proposal in the current Local Plan, which was promoted by the MOD and supported by the Local Plan Inspector. There are a number of MOD establishments in the District which are likely to undergo changes and the Proposal is important in guiding that change.

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

CHAPTER 7: EMPLOYMENT

Summary of Representation.
Change sought.

City Council's Response to Representation
Change Proposed

referred to the Secretary of State for a decision. This is likely to produce delays and additional complexities in bringing forward operational development, and should be avoided.

Change sought - replace Proposal E.5 with: 'Applications submitted for new development of existing Crown establishments will be supported where operational need is justified. The development will be expected to incorporate reasonable measures to comply with relevant plan policies wherever possible.'

Change Proposed – none.

Issue 7.18
Proposal E.6/Paragraph 7.40

Representation:

Ministry of Defence (306/5)

Welcome Proposal E.6 in principle but Defence Estates must seek best market value for disposals and public finance should not be depleted as a result of restrictive planning policies. E.6(ii), (iii) and (v) are unduly restrictive. Land beyond the built footprints is still classified as brownfield under the definition contained within PPG3. Excluding these open areas severely restricts the potential of surplus sites in terms of meeting the MoD's objectives for land disposal, and the government's objectives for maximising the use of brownfield land.

Change sought - replace Proposal E.6 with :

'Where MoD sites in the countryside are declared surplus to defence requirements, the reuse of them will be permitted provided that:

- (i) any new buildings are either a replacement of existing development or are sensitively located so as not to increase visual intrusion;*
- (ii) in the case of development of a more substantial nature, the proposal is accompanied by a full site appraisal and/or planning brief which respects the physical and policy constraints and opportunities affecting the site;*
- (iii) the development incorporates all reasonable measures to comply with*

City Council's Response to Representation

Proposal E.6 deals with MOD establishments in the countryside. As such it is necessary and appropriate for it to include certain restrictions, especially on new building, to ensure it accords with Government and strategic policy and the Local Plan's objectives. It would be quite inappropriate to remove the restrictions on development of these countryside sites simply on the basis of either their ownership or the fact that they may be (partly) brownfield sites. It is therefore considered that Proposal E.6 provides a reasonable means of considering development intentions for redundant MoD sites, allowing for consideration of the suitability of proposals and their environmental impact.

Whilst PPG3's definition of previously developed land does include 'defence buildings' and states that it covers the curtilage of development, it also states that 'this does not mean that the whole area of the curtilage should therefore be redeveloped. It particularly says '...Where the footprint of a building only occupies a proportion of a site of which the remainder is open land ... the whole site should not normally be developed to the boundary of the curtilage. The local planning authority should make a judgement about site layout in this context, bearing in mind other planning considerations, such as policies for ... development in the countryside....' (PPG3, Annex C)

Proposal E.6 criteria (ii) and (iii) seek to confine any redevelopment to parts of the site that are already substantially built-up and to avoid an increase in built development. Given that these sites are subject to countryside policies, this approach is entirely consistent with PPG3.

Criterion (v) of E.6 requires development proposals for redundant MoD land to accord with Proposal DP.3 and other relevant proposals of the Plan, particularly C.2-C.4, C.6-C.10, C.17 (development in the countryside), HE.1-HE.2, HE.13-HE.16 (historic environment) and T.1-T.5 (transport). These are reasonable provisions for the management of development and are likely to apply to several of the MOD sites within Winchester District, should they become available for redevelopment. It is entirely reasonable to apply these provisions to proposed development on redundant MoD land.

All planning policies are likely to have an effect on the value of land,

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

CHAPTER 7: EMPLOYMENT

Summary of Representation.
Change sought.

City Council's Response to Representation
Change Proposed

relevant plan policies where possible.

Save Barton Farm Group (175/12)

Where MOD sites in the countryside are declared surplus to defence requirements no proposals to restrict their redevelopment should be made. Surplus MOD sites are brownfield sites, which should be redeveloped before any consideration of greenfield sites.

Change sought – *remove restrictions in E.6 on redevelopment of MOD sites and remove the requirement in paragraph 7.40 that the amount of new development should not exceed that existing and that it may be appropriate to seek a reduction of built development.*

GOSE(261/44)

E.6 criterion (iii) refers to removing buildings. This does not appear to accord with Circular 18/84 Crown Land and Crown Development Part II. This indicates that any buildings erected by the Crown can be lawfully retained, with some exceptions.

Change sought - *not specified.*

but the important issue is that the planning policies are the most appropriate for the site in question. How these policies are then weighed in the decision making process against other factors such as site value are for the decision maker to determine in each case, and ultimately the Secretary of State. The function of the Local Plan is to provide the proper planning policy context, which it is considered Proposal E.6 does.

Whilst Crown buildings may be lawfully retained, the issue that the Local Plan addresses is what should happen to a site when it becomes surplus to requirements. It is likely that this will involve redevelopment and it is appropriate that the Local Plan should guide such development and that it should seek to ensure that buildings which are visually intrusive in the countryside are removed when the opportunity arises.

Change Proposed – none.

Issue 7.19
Proposal E.6 / Paragraphs 7.41-7.47

Representation:

English Heritage (250/4)

Support Proposal E.6 but it would be helpful if this proposal could be augmented by adding a requirement for appraisals to include an assessment of heritage features within such sites. It is noted that paras. 7.41 and 7.47 include such references, which should be given a higher profile.

Change sought - *not specified.*

Portsmouth City Council(297/3)

Proposal E.6 fails to provide any certainty or guidance on the uses that would be supported by the local planning authority. The Portsdown Main site straddles the Portsmouth/Winchester boundary and the Plan should be changed to be consistent with the Portsmouth City Local Plan.

Change sought - *amend Proposal E.6 or*

City Council's Response to Representation

The general support is welcomed.

English Heritage notes that paragraphs 7.41 – 7.47 refer to the heritage features existing in the main MOD sites in the District. Proposal E.6 also requires any development proposals to accord with other relevant proposals and specifically highlights the most relevant heritage proposals (HE.1-HE.2 and HE.13-HE.16). It is not considered necessary or appropriate to add further detail to Proposal E.6 or its explanatory text.

Proposal E.6 provides a general criteria-based policy for surplus MOD sites and it would not be appropriate to refer to individual sites specifically within the Proposal. However, paragraph 7.42 records that a comprehensive planning brief has been adopted by Winchester City Council, Portsmouth City Council and the MOD for the Portsdown Main site. Whilst the Local Plan need not include significant detail, it is suggested that a brief reference could be added to paragraph 7.42 regarding the uses that the Brief allows.

Paragraph 7.44, relating to Sir John Moore Barracks, merely refers to the fact that the Plan proposes that the Barracks should remain within the Winchester/Littleton Local Gap. The respondent has objected to that designation, and to the Plan's proposals for Winchester City (North) MDA. These objections are dealt with in relation to Chapters 4 (Countryside) and 12 (New Communities).

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

CHAPTER 7: EMPLOYMENT

Summary of Representation. **Change sought.**

City Council's Response to Representation **Change Proposed**

para. 7.42 to indicate a range of land uses which, at Portsdown Main, should be a mix of uses including offices/light industry, hotel/conference centre, leisure, health care and residential.

Ministry of Defence (306/6)

Object to paragraph 7.44 relating to Sir John Moore Barracks, see objections to Proposals C.3 (Local Gap) and NC.3 (Winchester City North MDA).

Change sought - not specified.

Change Proposed – paragraph 7.42:

....A comprehensive planning brief has been adopted by the two Authorities and the MoD and has regard to existing constraints, particularly access and prominence in the landscape (Portsdown Main Planning Brief, 1998). The Brief provides for a mix of uses, including light industry, hotel/conference centre, leisure and residential, but with an emphasis on employment uses.

Issue 7.20 **Proposal E.7**

Representation:

Ministry of Defence (306/7)

Proposal E.7 should be flexible enough to reflect the requirements of the MoD should these change within the lifetime of the Establishment Development Plan or the emerging Local Plan

Change sought - refer to the provisions of E.6 should HMS Dryad ever become surplus to requirements.

Southwick and Widley Parish Council (1197/1)

Object to proposal E.7, which is no longer relevant as HMS Dryad will be closed by 2011. However, should any development be considered Southwick House must be protected and a bypass will be needed.

Change sought – HMS Dryad should revert to a greenfield site for possible recreational purposes.

English Heritage (250/5)

Support Proposal E.7 but it would be helpful if this proposal could be augmented by adding a requirement for appraisals to include an assessment of heritage features within such sites. It is noted that paras. 7.41 and 7.47 include such references, which should be given a higher profile.

Change sought - not specified.

City Council's Response to Representation

The Government announced in July 2001 that HMS Dryad would become surplus to requirements and close by no later than 2011, although vigorous efforts would be made to advance this date (possibly to 2004). The intention is that substantial parts of the establishment will transfer to HMS Collingwood. The announcement came too late for the deposit Local Plan to be changed to reflect the situation, but on the basis of this announcement it seems clear that any proposals for HMS Dryad are likely to relate to reuse or redevelopment, rather than expansion of the existing MOD activities.

Accordingly, it would not be appropriate to continue to reserve land at HMS Dryad for future expansion, as Proposal E.7 does, and the Proposal should be deleted. Although the future of the establishment is somewhat uncertain, and the MOD's intentions may yet change, Proposals E.5 and E.6 provide an appropriate policy basis for guiding and dealing with any proposals that may emerge.

A reference to the situation at HMS Dryad should be retained in the explanatory text (to E.6) and this could refer to the importance of retaining Southwick House. However, 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.

Change Proposed – paragraph 7.46:

HMS Dryad, Southwick: ~~This Naval establishment has some potential for expansion.~~ The Ministry of Defence has announced that HMS Dryad will become surplus to requirements and will close by 2011 at the latest. It may be used for other MOD or Government uses or sold. The site is located in the countryside beyond the defined built-up area of Southwick. Therefore, Proposals E.5 and E.6 are applicable and provide appropriate guidance that will be relevant whether the site is retained in defence use or becomes surplus to requirements.

Change Proposed – new paragraph:

Add new paragraph after existing paragraph 7.46.

The area occupied by the establishment contains a number of important heritage features, ranging from Roman earthworks to the listed buildings of Southwick House and Clocktower. Southwick House was the Headquarters for the planning of the D Day landings in 1944 and has recently been restored. The Operation Overlord map

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

CHAPTER 7: EMPLOYMENT

Summary of Representation.
Change sought.

City Council's Response to Representation
Change Proposed

remains in the building, is of great historic significance, and should be retained on-site with, if possible, access open to the public. Most of the other buildings are modern and of little architectural merit. Some are intrusive in views from Portsdown Hill and, if new development or redevelopment are proposed, the opportunity should be taken to remove or replace these buildings.

Change Proposed – Proposal E.7:

Approximately 4.6 hectares of land between Norton Road and Boulter Lane is safeguarded for the possible future expansion of Ministry of Defence activities at HMS Dryad. Proposals for the development of this land should provide for the retention of existing trees and substantial new landscaping within and around the site, in accordance with Proposal DP.5, and accord with Proposal DP.3 and other relevant proposals of this Plan.

Change Proposed – paragraphs 7.47-7.48:

The MoD produced an Establishment Development Plan for HMS Dryad in 1996, which sets out the long term development proposals for the site over a 15-year period. The MOD are mostly concerned with redeveloping and improving the existing site in the short-term. Particular care will be taken to protect the setting of Southwick House, a Grade II listed building, and other sites of historic or nature conservation interest. Also, the impact on the special character, and views into or out of Southwick, Southwick Park, and Portsdown Hill will be important.

Land has been safeguarded for further development, as part of the MoD's longer term expansion plans for the site. Access to the site should be from Boulter Lane (where the junction with Southwick Road may require improvement) and Priory Road North, to enable traffic to enter and leave the area without needing to pass through the historic core of Southwick. In order to prevent the need for traffic using the site to pass through Southwick, the layout of the site is likely to need to include a link between the Boulter Lane and Priory Road North accesses. The land needs substantial landscaping to prevent an excessive intrusion into the setting of the village and longer views, and existing trees around the site should be retained.
