

Examination in Public: Matter 15

Matter 15:

- i) Are the policies and proposals for growth and change in this area appropriate and justified, including in relation to the NPPF/PPG, and in terms of environmental, economic and social impacts ?**
- ii) Are they clear and deliverable, including in respect of the associated infrastructure requirements?**

This further statement is submitted on behalf of Winchester College in respect of Winchester City Council's (WCC) failure to undertake a proper assessment of the settlement boundary in the area of College Walk and lying between the settlement boundary and the boundary of the South Downs National Park. The inclusion of this site within the countryside based on the evidence presented by the Council and upon which it has relied on in respect of this site is not justified and by inference, LPP2 has not been positively prepared.

This statement clarifies previous representations to the Consultation Draft Local Plan Part 2 2014 and the Pre Submission 2015 in respect of the proposed settlement boundary for Winchester town in the vicinity of College Walk and should be read in conjunction with these representations.

Winchester College own land at Pilgrim's Piece, east of College Walk, which is leased to and used by Pilgrim's School for sports and for staff parking (with access off College Walk), and land at Blackbridge Yard north of College Walk. Collectively we refer to these two areas as 'the site' as shown in Appendix 1.

To the east of Blackbridge Yard lies the River Itchen with housing immediately beyond. This area is viewed as being part of the built up area.

Blackbridge Yard is identified as site 1951 in the Council's SHLAA, but the 2015 SHLAA (EBT8) states that the site is "*no longer promoted*" when specific responses to the Council to the SHLAA updates in June 2015 and acknowledged by WCC in July 2015 clearly stated that the site was available. For the avoidance of doubt, the site is available for development, and has been promoted at every opportunity during SHLAA consultation or WCC SHLAA updates. To delete the site from the SHLAA based on incorrect evidence cannot be justified.

Secondly, the Appendix 2 of the Council's 2015 SHLAA (EBT8a) assesses that the site is "*previously developed land*". The site has been in regular use and has been used continually for the last 20+ years as a storage compound for the College's works department. It has also been used to assist with storage of materials during works in the local area being undertaken by the statutory undertakers.

The site is in daily use in connection with the educational use of Pilgrims' School and by Winchester College. As such it is viewed as part of the built up area and does not have a 'countryside use' as would be obvious from a site visit. Photographs of these uses can be provided if required.

The Council undertook a series of background studies to assist the LPP2 process. Appendix 2 to the SHLAA 2015 (EBT8a) states that the Council deleted the site at Blackbridge Yard from the SHLAA "due to constraints". The constraints include:

The Winchester Conservation Area – although on Policy Map 26 the conservation area notation appears to stop at the settlement boundary. The Winchester LDF Historic Environment Assessment (EBWT4) gives the site a 'red-amber-green' assessment but concedes that the extent of any archaeological interest is not known (red-amber) and that while there are no known historic buildings on the site, the setting of those nearby may be affected. Any development proposals for the site would consider the site's location within the Winchester Conservation Area and the setting of any nearby heritage assets. This is the same of almost all development in the historic centre and should not be seen as a constraint to development.

Flood risk. Work undertaken on flood risk - see <http://www.winchestercollege.org/campus-conservation-and-development-framework> remodels EA flood levels and concludes that the site is within flood zone 1. The EA place the vast majority of the site in flood zone 2 and a small area in flood zone 3. Irrespective of whether Blackbridge Yard is in Flood Zone 1 or 2, the National Planning Practice Guidance (NPPG) states that residential development is appropriate.

The site lies adjacent to the SSSI and SAC. In fact only the south east boundary of Blackbridge Yard lies adjacent to the River Itchen and the designated sites. Again, this is true of the housing east of the River Itchen, and other residential areas adjacent to the river through Winchester, which are included within the settlement boundary.

It is therefore difficult to understand how the Council has dismissed the site as having zero capacity due to constraints.

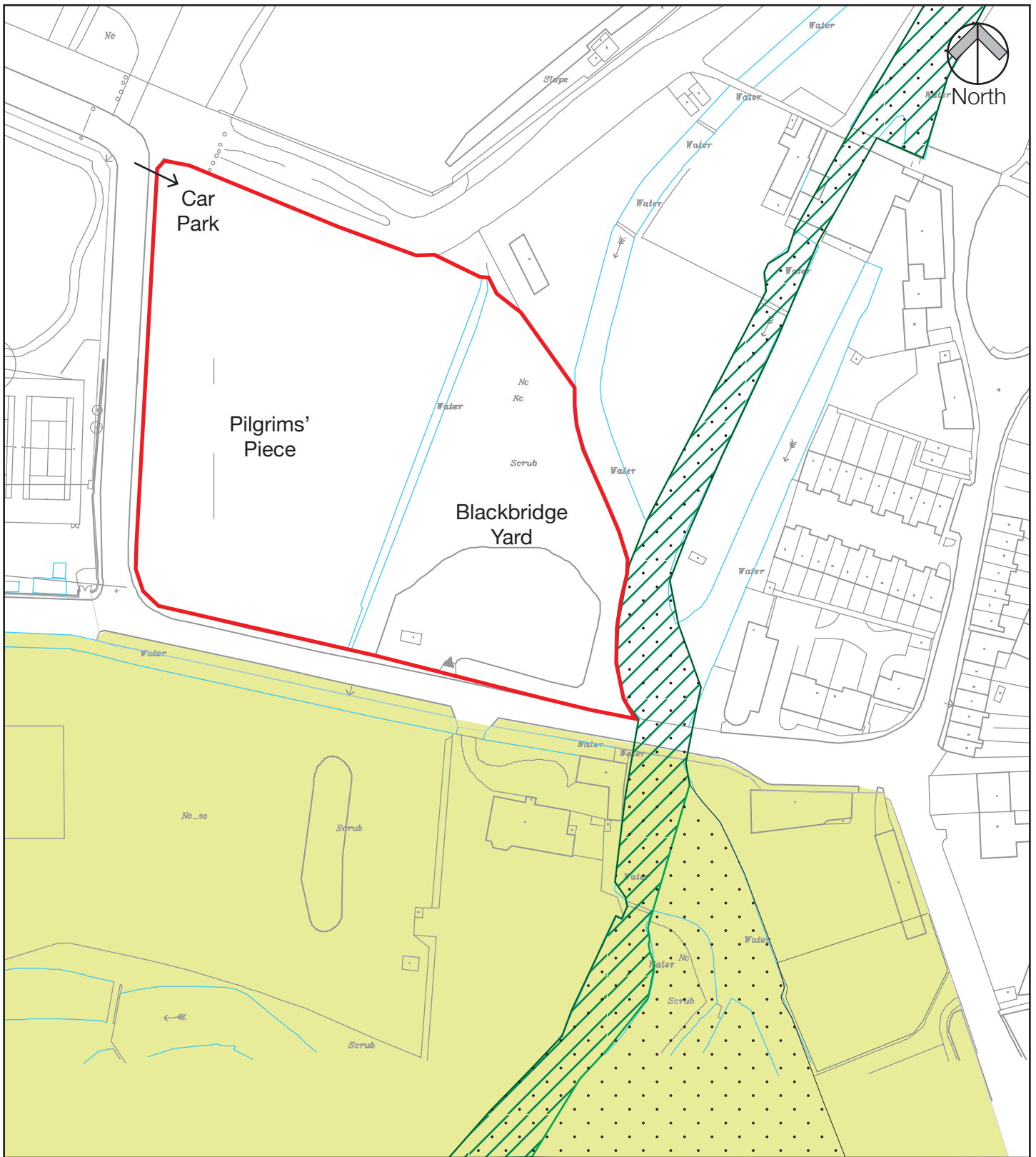
Winchester City Council's own Settlement boundary review (EBT5) paragraph 5 states: "A settlement boundary can serve a number of related, but separate, purposes such as:

- creating an edge to existing development thereby encouraging consolidation;
- helping to separate communities and therefore retain their individual identities; and
- defining the logical boundary between areas with different features and purposes, e.g. between areas with environmental or landscape designations and those suitable for development.





Had the City Council decided to undertake a full review of the settlement boundary for Winchester Town, by applying its own criteria, the Council would have found the whole site

consolidates the settlement boundary to the remainder of Winchester communities to the east and west. It would further conclude that College Walk running east to west is a natural and logical boundary to the edge of the settlement with the South Downs National Park immediately to the south.

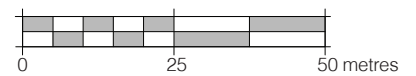
Winchester College suggest that the natural and most logical boundary of the settlement is the South Downs National Park and request that the Inspector agrees with this conclusion.



Appendix 1

-  The Site
-  South Downs National Park
-  Site of Special Scientific Interest
-  Special Area of Conservation

Scale 1: 1250 @ A4



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Drawn by NM

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