

Session/Issue 2

Economy/Employment/Retail – Policies CP8, CP9 and WT3

- i. *Are the employment policies and proposals, including for Bushfield Camp (Policy WT3) consistent with the NPPF and/or justified by clear and robust evidence?*
1. Bovis Homes and Heron Land Developments maintain that the employment policies and proposals are not consistent with the NPPF or justified by clear and robust evidence.
 2. The NPPF confirms at paragraph 21 that in drawing up Local Plans, local planning authorities should inter alia:
‘set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth; set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period.’
 3. JCS Policy CP8 states that the local planning authority will support economic development and diversification across Winchester District, in accordance with the spatial strategies for the District, through the retention, regeneration and intensification of previously developed land and by allocating land as necessary to support employment growth at sustainable locations.
 4. The spatial strategy for Winchester Town is set out in Policy WT1. It states that opportunities for economic development and diversification will be achieved through the retention of existing employment land and premises and new development or redevelopment to provide for new business growth to broaden Winchester’s economic base.
 5. The JCS fails to specify the amount of additional employment floorspace required over the plan period. It does not include a strategic employment allocation despite the acknowledgement in paragraph 4.8 of Background Paper 4: Employment Land and Retail Study that *‘The Council’s evidence base identifies a number of challenges for Winchester Town, specifically the need to broaden and diversify the local economy to ensure that it is not over-reliant on the public sector; and the need to rebalance the economy in a way that begins to address the mismatch between in and out commuting.’* Paragraph 4.11 of the aforementioned Background Paper therefore notes that the case for a knowledge based business park is more about generating job growth and changing the employment profile of the town, rather than providing space for projected demand.
 6. Policy WT3 (Bushfield Camp Opportunity Site) is identified as being potentially capable of meeting a future need to diversify the town’s economy, should the case be made for employment on this site and the policy requirements be met. Not only do Bovis Homes and Heron Land Developments maintain that this is an inappropriate site for a knowledge park, there is considerable uncertainty over its delivery.
 7. There is sufficient evidence in the Winchester District Economic and Employment Land Study (EELS) and subsequent Supplementary Report

(EELSSR) to justify the inclusion of a knowledge park as part of a mixed use allocation of land north of Winchester in preference to one at Bushfield Camp.

8. The EELSSR states at paragraph 4.27 that a knowledge based business park at Winchester would cater for the skills of the immediate population and draw on the historic nature of the environment, despite the fact that the report states at paragraph 4.24 that access from Bushfield Camp to Winchester City Centre is indirect and relatively limited. Furthermore, paragraph 3.33 of the same report notes that a proposed business park to the south of Winchester would have a greater potential to appeal to some of the in-commuters who mainly come from the south of the district (i.e. not the immediate population referred to above). It also notes that this could increase in commuting and would be more likely to compete with the South Hampshire Strategic Employment Zone (SHSEZ) at Eastleigh for new economic development. Conversely, a major mixed-use development at Barton Farm is noted as potentially attracting some of the 8,600 workers who currently commute out of the town (i.e. the immediate population) mainly to higher end jobs in London and Basingstoke. A knowledge based business park located on land north of Winchester could offer higher end jobs that would tend to further reduce upper end out-commuting to the north.
9. The EELSSR considers both Bushfield Camp and land north of Winchester (Barton Farm plus land to the north of Well House Lane) as to their suitability for the development of a knowledge based business park. In relation to Barton Farm, the report states that a major mixed-use development in this area would provide a logical extension to Winchester town, which could be integrated into the existing urban area and notes that the site would be unlikely to involve any abnormal infrastructure costs. The area has an attractive environment and relatively convenient local accessibility to the city centre and railway station. The EELS concluded that the Barton Farm area has 'strong potential for the development of a knowledge based business park' (paragraph 4.23).
10. Bushfield Camp is identified as being a prominent site with good access to the M3 motorway (albeit that Bovis and Heron note that the junction is already over capacity leading to significant levels of congestion) however access to Winchester city centre is indirect and relatively limited such that an urban extension in this location would be difficult to integrate with the existing urban area. The site includes areas of landscape and wildlife sensitivity, is less extensive than the Barton Farm area, and is set within an area of attractive landscape which is part of the landscape setting of the city. The report concludes that the site has good potential for the development of a knowledge based business park, but the viability of development could be constrained by the costs of demolition and clearance and provision of road access, public utilities and other infrastructure. It is considered that the business park would need to form part of a wider mixed-use development for both housing and employment to achieve viability but this could be limited by the developable area available.
11. The NPPF confirms that the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth and therefore significant weight should be placed on the need to

support economic growth through the planning system. The failure of the JCS to allocate an appropriate and deliverable site for a knowledge park renders it out of conformity with the general policies and principles of the NPPF.

12. There is no certainty that land at Bushfield Camp will ever come forward for development; if it does, the Policy does not specify the final land use. It has not been included in response to an identified need. Policy WT3 is therefore not sound as it is neither positively prepared, justified, effective or consistent national policy.
 13. Policy WT3 should be deleted and replaced with a policy for a strategic employment allocation at North Winchester.
- ii. *Will they deliver the levels of new employment sought or, if not, what else needs to be done and/or should more (or less) land be identified, for example by allocating new brownfield (PDL)/greenfield sites?*
1. The JCS does not make it not clear what levels of new employment are being sought in Winchester Town. Although paragraph 3.10 acknowledges that there is a need to ensure sufficient land and premises are available to allow existing businesses to prosper and provide opportunities for new businesses and enterprises to look towards Winchester as a location of choice, this need is not quantified.
 2. Policy WT3 (Bushfield Camp) cannot be relied upon to deliver any employment. There is no certainty that Bushfield Camp would be available for development given the current attempts to designate it as a Village Green under Section 15(1) of the Commons Act 2006 (see Plan at Appendix 1), or that it would be financially viable (indeed the studies commissioned by the City Council on this issue to date suggest it would not be financially viable). Other fundamental issues would also need to be overcome including those associated with the impact of development in this location on the River Itchen SAC, the fact that it would add to existing congestion at Junction 11 of the M3 and as a prominent site it would have a significant impact on views from the South Downs National Park. Notwithstanding the site's inherent unsuitability, the Plan does not provide any flexibility to allow an alternative site to come forward.
 3. Paragraph 3.34 of the JCS sets out how the development strategy for Winchester Town (Policy WT1) is proposed to be delivered. Bovis Homes and Heron Land Developments object to the inclusion of Policy WT3 as delivering Policy WT1 on the basis that it is an opportunity site, which may never be delivered. Furthermore as the ultimate use of Bushfield Camp is not specified in WT3 it cannot be said to be delivering Policy WT1.

iii. Should the policies be more specific in relation to the amounts and locations of new employment provision to be sought over the plan period?

1. The policies should be more specific in relation to the amounts and locations of new employment provision to be sought over the plan period.
2. Policy WT3 is an opportunity site and therefore as such it may never be delivered. As the ultimate use of Bushfield Camp is not specified in Policy WT3, it is not clear how it could be relied upon to deliver any employment provision.
3. If the JCS is not more specific in relation to the amounts and location of new employment provision, it is not clear how the Council intend that it be delivered. Policy CP8 states that support for the key economic sectors will be achieved through the retention of appropriate premises and new development to ensure that there is an adequate supply of land and premises. It is not clear how this policy will be implemented or how 'adequate' will be determined.
4. Policy CP8 should specify the amount of additional employment space to be provided and either allocate appropriate sites or set out criteria for the identification of appropriate sites. This issue should not be deferred to a subsequent Development Plan Document.
5. The promotion of mixed-use development is a core land-use planning principle identified in the NPPF. Throughout the preparation of the JCS, Bovis and Heron have consistently promoted the advantages of a comprehensively planned, mixed use development North of Winchester. Such an allocation would accord with the core principles set out in the NPPF, deliver sustainable development and provide the Plan with sufficient flexibility to adapt to changing circumstances.
6. Policy CP8 is not sound as it is not effective. The Policy should be amended to specify the amount, distribution and nature of additional employment floorspace required and the criteria to be used for the allocation of additional floorspace.

Appendix 1

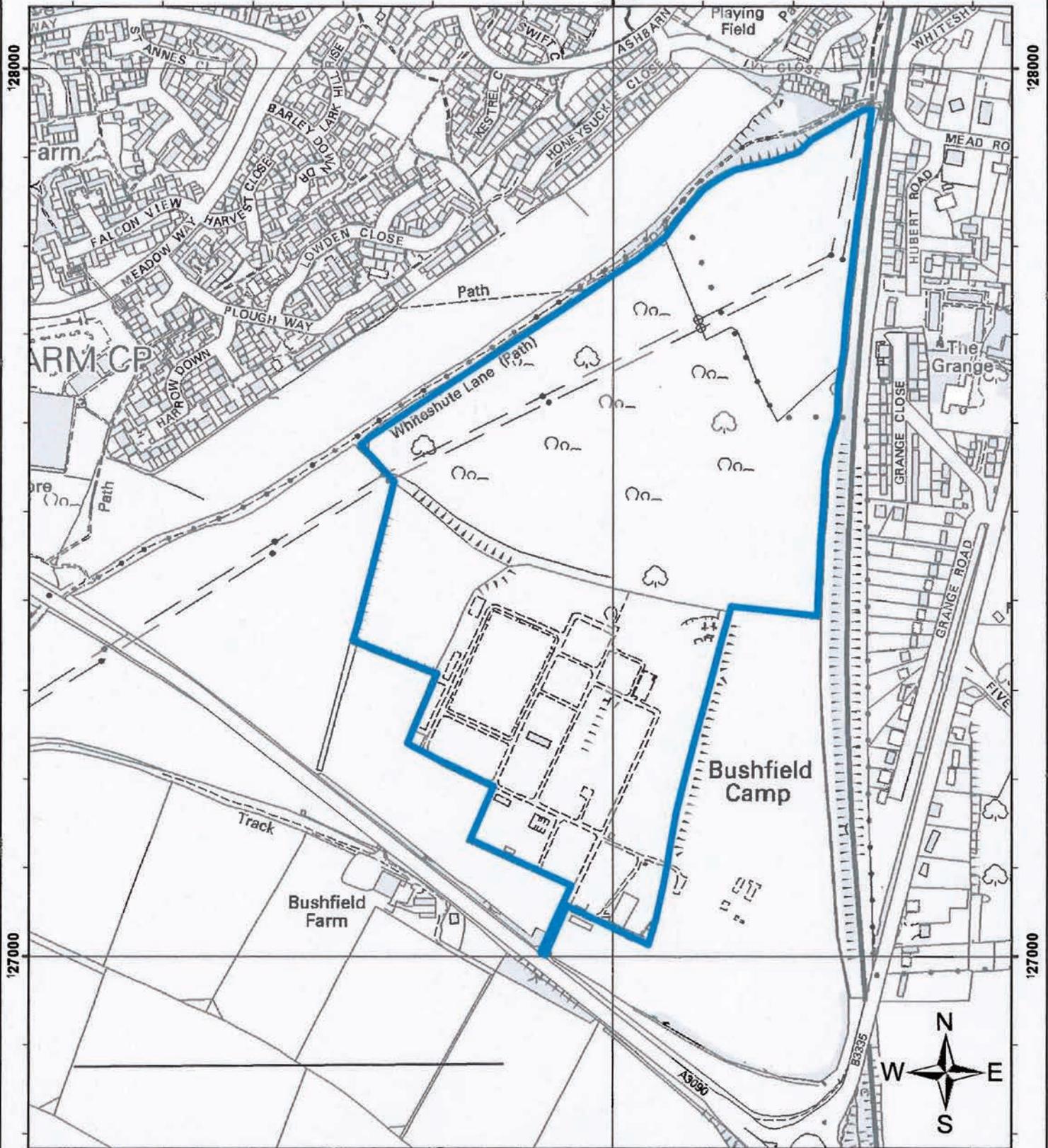
Commons Act 2006 – Section 15(1) Application for the registration of land as a town or village green.

Plan showing extent of land subject to the application.

Commons Act 2006 - Section 15(1) Application for the registration of land as a town or village green

Reference No.02121
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Policies CP8, CP9
and WT3.

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Hampshire
County Council

Commons Registration Team
Culture, Communities and
Business Services
Mottisfont Court
High Street
Winchester SO23 8ZF

Application for the registration of land as a village green in the Parish of Compton and Shawford and in Winchester City

Extent of land subject to
this application shown:-



Scale 1:6000
Drawn: AGK
Checked: AL

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