

WINCHESTER CITY COUNCIL AND SOUTH DOWNS NATIONAL PARK AUTHORITY
WINCHESTER DISTRICT LOCAL PLAN PART 1 – JOINT CORE STRATEGY
FURTHER STATEMENT ON BEHALF OF WINCHESTER COLLEGE

Session/Issue 4

v) *Are policies CP6 and CP7 consistent with the NPPF and/or justified by clear and robust evidence and appropriate to meet local needs for open spaces, services and facilities?"*

1. These further representations are made on behalf of Winchester College ('the College') in respect of **policy CP6**. Paragraph references use those in the Local Plan Part 1 tracked changes version 2 dated 3rd October 2012.
2. The College understands the Council's general wish to resist land-use changes that would adversely deprive local communities of facilities that could still be economically provided, but feels that Policy CP6 as currently drafted is a blunt instrument that will unnecessarily limit the flexibility that government policy requires to be available to educational establishments in a changing world. It needs refinement and explanation if it is not to give rise to problems of practical interpretation.
3. Policy CP6 applies equally to the only shop in a rural settlement as it does to large education establishments with wide catchments. The College is an example of the latter, with facilities spread over a 60ha campus in around 150 separate buildings. As currently drafted the policy is focused on smaller scale, discrete premises and sites the loss of which would demonstrably threaten the existence of a valued facility or service.
4. The complex character and pattern of use of the College campus is the product of centuries of change and improvement as the College has continuously evolved to maintain its standing as an education institution of national as well as local renown. It is not static and requires constant adjustment. In such circumstances, judging the acceptability of the effects of the land-use change in a rapidly changing educational context is much more complex than Policy CP6 implies.
5. NPPF makes the point that plan making and decision taking should not simply be about scrutiny, but be a creative exercise in enhancing and improving places in which people live. Policy CP6 attempts to be both but fails to encourage the latter. In the respect of education, NPPF specifically identifies and encourages change. Thus it requires local planning authorities ('LPAs') to take a proactive, positive and collaborative approach to ensuring a sufficient choice of school places is available to meet the needs of existing and new communities (paragraph 72), and to development that will widen choice. It also requires LPAs to give great weight to create, expand or alter schools, working with schools to identify and resolve planning issues (paragraph 72). Paragraph 162 requires LPAs to assess the quality and capacity of infrastructure, including education, working with providers to meet forecast demands.
6. The College intends to maintain its policy of making the best use of the College's building stock and landholding, although it cannot precisely forecast what changes it may need to undertake over the length of the plan period. In order to secure the

funds necessary to invest in the development and improvement of the education facility, some of those changes may involve the sale or lease of buildings or parts of the College landholding on the open market. Some anticipated changes of this nature are set out in the *Campus Conservation and Development Framework*, a Masterplan for the campus adopted by the College in 2009 and subsequently informally endorsed by the City Council.

7. As its title implies, the *Campus Conservation and Development Framework* acknowledges the College's conservation responsibilities, but it also takes account of its role in providing local facilities, particularly of a recreational nature, for the local community.
8. In order to bring it in line with NPPF, Policy CP6 (and associated text) needs to be amended to recognise that larger establishments must be permitted to plan the provision of the service and facility over the whole of their estate, rather than its individual components. As drafted, the policy does not recognise that the College has continuously to enhance and improve the service and facilities it offers. The College therefore requests that Policy CP6 and supporting text are amended by the addition of the following (additional text in red and underlined):

- (i) Insert after the first sentence of paragraph 5.45:

It is recognised that in the case of larger education and other institutions within the District, facilities may be delivered from a number of buildings, premises or sites. In such instances, development proposals for other uses should demonstrate how the loss of a site or building currently delivering local facilities or services will be compensated for by provision elsewhere.

- (ii) Within the wording of Policy CP6:

Policy CP6 Local Services and Facilities

The Local Planning Authority will support proposals for the development of new, extended or improved facilities and services in accordance with the development strategies set out in Policies WT1, SH1 and MTRA1.

The Local Planning Authority wishes to retain and improve the facilities and services available across the District. Development proposals should not threaten or result in the loss of premises or sites used to provide services and facilities unless it can be demonstrated that:

- the site/premise is not required because the service or facility has been satisfactorily relocated or is no longer needed to serve the locality; and
- the site or building has no reasonable prospect of being used for an alternative service or facility which would benefit the local community.

Where the service or facility comprises a number of individual premises or buildings such as large education establishments, development of part of the service or facility for other uses is considered acceptable providing it does not threaten the continued existence of the service or facility overall.

When considering proposals, account will be taken of:

- whether the loss of the service or facility would cause harm for those living within the neighbourhood, settlement, or rural catchment with a reasonable need to access such facilities in the future; and**
- whether the loss of the facility would have a detrimental impact upon the overall vitality and viability of the settlement.**