

Winchester District Local
Plan Part 1

Examination

The Church Commissioners
for England
(10451)

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1. Strategy/vision/sustainability (Issue 1)

Does the Joint Core Strategy [JCS] provide an appropriate spatial vision for the district over the plan period, consistent with national guidance in the NPPF and/or justified by clear and robust evidence and, if not, what is the best alternative and why? (Question 1).

- 1.1 In respect of the spatial strategy for Winchester Town, and specifically policies WT1 and WT3 identifying the opportunity site at Bushfield Camp, the policies are entirely consistent with the NPPF.
- 1.2 One of the 12 principles of planning set out in the NPPF (paragraph 17) is to set out a positive vision for the future of the area. Policy WT3 sets out a positive planning solution for the former army camp, which has been subject to speculation over its future since its closure. It recognises its potential for a commercial development opportunity that could help attract inward investment capable of helping to reshape the local employment profile. Policy WT3 is also market relevant and deliverable (see our comments under Issue 2).
- 1.3 A key objective of the NPPF is delivering sustainable development, including building a strong and competitive economy. At paragraph 21 the NPPF states:

‘In drawing up Local Plans, local planning authorities should:

- *set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;*
- *support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances;*
- *plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries...’*

- 1.4 Identifying an opportunity site as part of the strategy for Winchester Town is a clear local response to paragraph 21.
- 1.5 Likewise, the strategy set out under policy WT1 is in accordance with paragraph 161 of the NPPF:

‘Local planning authorities should use this evidence base to assess:

the needs for land or floorspace for economic development, including both the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period, including for retail and leisure development’

- 1.6 As recognised by the DTZ (2011) report at page 29, the case for a knowledge park development (the JCS now refers simply to an opportunity site) is much more about generating job growth and changing the employment profile of Winchester than about providing space for projected demand.
- 1.7 Please also see our more detailed comments made below under Issue 2 (Question 1).

Will the strategy satisfactorily and sustainably deliver the new development needed to meet the objectives over the plan period and, if not, why not and what needs to be changed? (Question 2)

- 1.8 With specific regard to the proposed spatial strategy for Winchester Town (WT1), there is a stated objective to *'broaden Winchester's economic base through growth in sectors including knowledge, tourism, creative and media industries and more particularly start-up premises to encourage entrepreneurship'* (page 40).
- 1.9 The JCS adopts an approach summarised as *'development with a purpose'* (paragraph 3.8), which includes managing growth to improve the social, environmental and economic well-being of the whole community. This is translated into a spatial vision for Winchester Town (paragraph 3.9) that seeks to, amongst other things, seek ensure that:
- 'the local economy thrives on its strengths in higher education, creative and media industries, and other knowledge-based activities'*
- 1.10 This vision will be achieved by positively addressing Winchester's development needs, which include providing land and premises for businesses and opportunities for new businesses and enterprises to look towards Winchester 'as a location of choice' (paragraph 3.10).
- 1.11 At paragraph 3.16, the JCS recognised the Council's Economic Strategy, and its key objectives. These include:
- *'Promotion of the knowledge based industries – to 'future proof' the economy through diversification and promotion of knowledge and low carbon enterprises*
 - *Reduce commuting – to balance the in and out daily commuting flows*
 - *Provision for creative industries – to retain graduates from the universities by providing the right start-up accommodation'.*
- 1.12 It is clear, therefore, that a key purpose of the JCS is to strengthen the Winchester Town economy by embracing growth opportunities, giving the signal that it is 'open for business', whilst at the same time

respecting the town's special heritage and setting (policy DS1), which are part of its commercial and wider attraction.

- 1.13 The opportunity site policy (WT3) is an appropriate response to this objective as there are no more sequentially preferable sites available in the city to capture significant employment growth (this is expanded on in further detail in response to Issue 2). It is also desirable to offer a choice of opportunities within and on the edge of town, if Winchester is to be recognised as an attractive and viable location for business.
- 1.14 As stated in Background Paper 4 (paragraph 4.11), land at Bushfield Camp has the potential to respond to opportunities from the commercial market that would help capture a more diversified economy in Winchester. Without policy WT3, the JCS will be ill equipped to capture future employment growth opportunities that may emerge over the plan period, which could make a significant contribution to rebalancing the local economy, in the wake of significant public sector cuts¹. The smaller-scale potential employment opportunities within the city can also contribute to this economic strategy, but are unlikely to be able to accommodate new HQ buildings or a bespoke business cluster, such as a knowledge park, which is needed to achieve a transition in the local economy to more highly-paid jobs (an objective of the Economic Strategy 2010-2020).
- 1.15 For further comment relating to the appropriateness of the Winchester Town strategy, please see our response made under Issue 2.

Are any objectives, policies or proposals inconsistent with national guidance and, if so, is there a local justification supported by robust and credible evidence? (Question 4).

- 1.16 In respect of policies WT1 and WT3, the spatial strategy is entirely consistent with the NPPF. Please see our comments made under Issue 1 (i) and Issue 2 explaining how these policies are in compliance with national policy and government strategy.

Is there clear evidence demonstrating how and why the preferred strategy was selected, including in terms of appropriate consultation with the public, representative bodies, neighbouring authorities, service and infrastructure providers and other interested parties? (Question 5).

¹ The Economic Strategy 2010 – 2020 identifies that the County town of Winchester has a higher than average number of public sector employees, the main employers being the County Council, City Council, Hampshire Police, Winchester Prison and Winchester and Eastleigh NHS Trusts. DTZ (2011) project jobs in the public sector in Winchester District to decline by 1,300 between 2009 and 2025.

- 1.17 In accordance with the NPPF, Winchester City Council has used a proportionate evidence base for its plan-making. Underpinning the economic strategy for Winchester Town are the following key evidence base documents:

Winchester District Economic and Employment Land Study, Final Report, October 2007, SQW Consulting

- 1.18 This report identified a shortage of modern employment sites and premises in the Winchester town area (paragraph 4.9) (i.e. the spatial area defined in the City Council's core strategy). A recommendation of the report was to consider encouraging knowledge-based industries to help address the wider economic role of the town in the district and the south Hampshire sub-region (paragraph 5.13).

Winchester District Economic and Employment Land Study: Supplementary Report, January 2009

- 1.19 This update in 2009 identified the role that a knowledge park development could play in rebalancing the local economy. Paragraph 4.16 of the report states:

'Over the longer term, therefore, there appears to be a sound logic for developing a knowledge based business park in the Winchester town area in line with the conclusions of our original study in 2007. Knowledge based companies are often attracted by the heritage and environment of cities like Winchester, York and Edinburgh. Their labour requirements can often be met by local people who, for the same reasons, have been attracted to or have decided to live and remain in the area. At present a good proportion of the highly skilled people who live in Winchester town travel to work in London and elsewhere to apply their skills and so a knowledge based business park could reduce net commuting and help to modernise the structure of the local economy.'

- 1.20 The report provides some comparators including MEPC's Milton Park at Didcot, the Oxford Business Park and Green Park at Reading (paragraphs 4.17 to 4.20).

- 1.21 Locations for a knowledge park were also discussed. Barton Farm, the site of a residential allocation of 2,000 dwellings and now benefiting from planning permission, was seen as having potential. Bushfield Camp was also considered to be good location, with excellent access to the M3, an attractive environment and land that has been previously developed (paragraph 4.25).

Winchester Economic Strategy 2010 to 2020

- 1.22 The adopted Economic Strategy includes a number of key outcomes it is aspiring to achieve. The first 'outcome' is that Winchester '*exploits its reputation as a cultural stronghold, using this as a means to stimulate a modern and creative approach to business*'. Within this is an objective to

create 2,000 new high-value employment opportunities in Winchester town by 2020. A key action related to this objective is listed as further exploring the potential to attract high-value enterprise to Winchester, especially in the knowledge industries.

- 1.23 The progress indicator associated with this first outcome is '*LDF policies support development of a knowledge park*'.

Review of Employment Prospects, Employment Land and Demographic Projections, DTZ, August 2011

- 1.24 Prior to pre-submission consultation on its local plan, the Council commissioned DTZ to update its employment land evidence in response to the '*changing economic environment*'.
- 1.25 DTZ acknowledged that Winchester Town has a strong creative sector and is therefore well-placed to out-perform national trends in declining manufacturing if this sector strengthens by focus on product development, design and marketing, and by tapping into the universities' resources. The DTZ review presented a 'radically different assessment of employment land requirements' (section 3.6) compared to those identified by SQW. Across the district the requirement is assessed to be an additional 15.7 hectares of employment land, down from 44 to 84 hectares in 2007. This is explained by employment projections being significantly downgraded, the focus of growth now being in the business services sector (rather than manufacturing, distribution and retail), and a shift towards higher densities.
- 1.26 According to DTZ, there could be a case, however, for increasing the amount of floorspace in Winchester Town to avoid risks to the town's economy, namely the significant public sector cuts.
- 1.27 Also according to DTZ (page 29) an implication of its updated employment land requirement is that the case for a knowledge park is much more about generating job growth and changing the employment profile of Winchester than about providing space for projected demand.

2. Economy/employment/retail (Issue 2)

Are the employment policies and proposals, including for Bushfield Camp [Policy WT3], consistent with the NPPF and/or justified by clear and robust evidence? (Question 1)

The National Planning Policy Framework (NPPF)

- 2.1 The Church Commissioners for England consider that policy WT3 is consistent with the economic growth objectives of the NPPF (please refer to

comments submitted to the Council dated 30 July 2012, appended to this report and comments provided in response to the questions in Issue 1).

- 2.2 Comments on the evidence base underpinning the spatial strategy for Winchester Town have been made under Issue 1 (Question v) although further comments about how policies WT1 and WT3 are in accordance with the evidence base are made below.
- 2.3 In assessing the JCS's compliance with the NPPF it is important to note what it requires of local authorities.
- 2.4 An over-arching test of local plans is that they are positively-prepared (paragraph 182) and that they reflect the NPPF's presumption in favour of sustainable development (paragraphs 11 to 16).
- 2.5 According to the NPPF (paragraph 7), sustainable development includes an economic role:

'development that contributes to building a strong, responsive and competitive economy, supporting growth and innovation in the appropriate places'.

- 2.6 The Core planning principles of the NPPF (paragraph 17) include the requirement for the planning system to:
- Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs
 - Respond positively to wider opportunities for growth.
- 2.7 In respect of plan-making, the NPPF (paragraphs 150 to 158) requires local plans to:
- Be aspirational but realistic
 - Set out the opportunities for development
 - Includes clear policies on what will or will not be permitted and where
 - Promote flexible use of land
 - Use a proportionate evidence base.
- 2.8 In relation to planning for business needs, the NPPF (paragraphs 160 and 161) encourages local authorities to:
- Have a clear understanding of business needs
 - Work closely with the business community, neighbouring authorities and the local enterprise partnership to understand local needs and how they may be changing
 - Use the evidence base to assess both the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period.

- 2.9 To deliver sustainable development, in respect of the economy, the NPPF seeks to build a strong and competitive UK economy to respond to the twin challenges of global competition and a low carbon future (paragraph 18).
- 2.10 To achieve this objective, local planning authorities are challenged to plan proactively to meet the development needs of business and contribute to reshaping the economy so it is fit for the challenges of the 21st century (paragraph 20). This should be achieved by (paragraph 21):
- Setting out a clear economic vision and strategy
 - Identifying strategic sites for local or inward investment and meet any anticipated needs over the plan period
 - And, crucially, being flexible enough to accommodate needs not anticipated in the plan to allow a rapid response to changes in economic circumstances.
- 2.11 The strategy for Winchester Town, with policy WT3 as an integral part, is a positive and proactive response to the evidence base, which identifies the need to reshape and rebalance the local economy in the wake of recession and public sector cuts. It provides the JCS with an effective degree of flexibility to respond to opportunities to capture employment growth that may emerge over the plan period. Independent comment from the Academy of Urbanism (September 2011, copy appended) recognised the current absence of a policy basis to capture significant inward investment opportunities, which gives support to the inclusion of an opportunity site policy in the spatial planning strategy.
- 2.12 Policy WT3 provides a clear and broad policy framework for managing the development opportunity at the former army camp, on the southern edge of the city, which accords with the NPPF's presumption in favour of sustainable development. The policy will allow the utilisation of this previously developed land only if a suitable proposal comes forward to achieve sustainable development, i.e. development that contributes to building a strong, responsive and competitive economy (NPPF paragraph 7).
- 2.13 The Government's key objective of strengthening and rebalancing the economy has been further emphasised in the HM Treasury's Budget Report (March 2012). The strategy outlined in the Budget Report '*lays the foundations for a more stable economy, built on enterprise and private sector investment*' so that the UK is well-placed to compete in the knowledge-based global economy (paragraph 1.4).
- 2.14 Identifying an opportunity site in the JCS is an appropriate local response to this national strategy.

Locations for an opportunity site

- 2.15 Work undertaken by SQW Consulting on behalf of the City Council in 2007 and updated in 2009, identified that land at Bushfield Camp was in principle an appropriate location for an opportunity site. As set out in our appended

Review of Alternative Sites, Bushfield Camp remains the obvious location for the opportunity site policy. More recently, in its review of the economic evidence base, DTZ (2011)² recognised the purpose and value of including an opportunity site in the JCS.

Commercial market assessment

- 2.16 A study by property experts Knight Frank LLP, on behalf of the Church Commissioners, supports the identification of land at Bushfield Camp as the location for the opportunity site under policy WT3 (report appended).
- 2.17 Designation of the development opportunity in the core strategy is seen to be of utmost importance, as it will give credibility to the opportunity site in the commercial market. This will allow the opportunity to be effectively marketed, within the local region and on a broader geographical basis, as will avoiding the more restrictive designation of a ‘knowledge park’, which is a difficult concept to define, and, as far as we are aware, is without direct comparators in the UK to date.
- 2.18 The second stage of credibility would be obtaining planning consent for development, which is clearly more achievable if this is supported by planning policy.
- 2.19 Knight Frank LLP has assessed that the commercial occupier demand likely to be of relevance to Bushfield will be derived from a core area between Junction 5 of the M3 moving south, together with the M27 from Nursling in the west to Portsmouth/Havant in the east. In its assessment of demand, Knight Frank LLP has identified that there is a significant quantum of lease event activity (1.36m sq ft of potential lease breaks or expiries) in this core area between 2013 and 2017. Occupiers who are seeking to upgrade accommodation and move to new space are driving demand. The research undertaken by Knight Frank LLP, indicates that there could be strong interest from businesses looking to secure more suitable premises in this period.
- 2.20 The site is considered to meet the principal criteria required for a successful commercial opportunity site, including the capacity to provide a range of differently sized accommodation opportunities.
- 2.21 In accordance with the NPPF, the opportunity at Bushfield Camp has been shown to be commercially realistic if it is supported by a designation in the plan.

² Review of Employment Prospects Report, DTZ (August 2011)

Previously developed land

- 2.22 Identifying land at Bushfield Camp for the opportunity site policy is also consistent with the NPPF's preference for reusing land that has been previously developed (PDL). Unlike the alternative options on the edge of the city (please refer to our alternative sites assessment review appended to this report), that are also being promoted, the opportunity at Bushfield Camp involves redeveloping the footprint of the former army camp, i.e. PDL. This would achieve the wider objective of helping to resolve the future of this key site on the urban edge.

Evidence base

- 2.23 The NPPF is clear that the evidence base should be proportional and that details of form, scale, access and quantum of development are only needed in appropriate circumstances (paragraph 157). In the case of the opportunity site policy (policy WT3), its purpose is to provide a framework for managing the development opportunity should an appropriate use or uses emerge over the plan period. It would not be proportionate at the JCS stage, therefore, to include development-specific details.
- 2.24 To supplement the Council's evidence base, however, the Church Commissioners have provided technical studies covering the following issues:
- Delivering the Vision (Roger Tym & Partners) – this report explored the vision of a knowledge park, what this might look like, and how it would help to strengthen the local economy and help address commuting issues
 - Cultural landscape appraisal (Terence O'Rourke) – which assessed the ability of the site to accommodate development which respected the important landscape setting
 - Transport and utilities assessment (Gifford) – provided an initial exploration of how travel demand could be successfully managed
 - Geotechnical assessment (Gifford)
 - Archaeological evaluation (Wessex Archaeology)
 - Ecology strategy (Terence O'Rourke)
 - Arboriculture assessment (Barrell Treecare) – this information was shared by the City Council to inform the scope of a Tree Preservation Order, confirmed earlier this year.
- 2.25 This information, much of which has been available to the Council since preferred options stage, has not been published as part of the evidence base. This work has identified the potential for a landscape-led master plan, which could successfully integrate development, in an appropriate form and scale into this sensitive setting, thereby unlocking the development potential of this previously developed land and resolving the future of this sensitive location. No extraordinary costs of development have been identified.
- 2.26 In response to this evolving evidence base, land at Bushfield Camp has been included in the emerging core strategy (since preferred options in 2009), and

has therefore been subject to thorough public consultation. The Church Commissioners have participated in the consultation process at each opportunity.

Conclusions

- 2.27 Policy WT3 is a positive response to a wider opportunity for growth. The spatial framework for Winchester Town is therefore entirely consistent with the NPPF and justified by robust evidence, and the JCS can be considered sound in this respect.
- 2.28 Bushfield Camp is a site that is likely to be attractive to the commercial market, presuming it is given credibility by identifying it in the spatial planning framework. It therefore has the potential to make a significant contribution to meeting the objective of the JCS to strengthen and rebalance the local economy.
- 2.29 In its representations at pre-submission stage, however, the Church Commissioners have identified some amendments to the wording of policies WT1 and WT3 to better explain the purpose and justification of the opportunity site policy, and to better express the wider benefits that the land at Bushfield Camp can deliver for the community. A copy of these representations is appended.

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? (Question 2).

- 2.30 Policy WT3 is not an allocation to meet projected employment land need, therefore it is not, in this respect, key to the spatial strategy. It is an opportunity should a bespoke land requirement come forward over the plan period, which would help to reshape the employment profile of the city by delivering private sector growth. Together with the redevelopment opportunities within the city, which are of limited scale, identification of an available opportunity site on the edge of the settlement is an effective strategy to achieve the local economic and wider objectives, which are explored in further detail now.
- 2.31 As explained in response to Question 1, policy WT3 is an appropriate and justified response to the evidence base and local and national economic objectives. Policy WT3 is complementary to, yet distinctive from, the other economic policies of the JCS, which address projected demand. It will ensure that the plan has a policy basis to respond to significant private sector-led investment opportunities that may emerge over the plan period and could help rebalance the local economy in the face of growing sub-regional and global competition.

- 2.32 Without the opportunity site policy, the Council's aspiration to future proof the economy through diversification and promotion of knowledge and low carbon enterprises (paragraph 3.16, policy WT1 and the Economic Strategy 2010-2020) will be undermined and it will mean continuation of the *status quo* for the local economy, which, as observed by the Academy of Urbanism (report appended), is not well placed at present to attract significant inward investment
- 2.33 Policy WT3 is about addressing the qualitative employment offer of Winchester Town, in accordance with the NPPF (paragraph 161). This appropriately responds to the evidence base which has identified via local agents that the local economy suffers from a lack of modern employment floorspace and that there are limited opportunities for economic growth in the town centre (SQW, 2009 paragraphs 4.13 and 4.25).
- 2.34 As observed in the Economic Strategy 2010-2020, Winchester needs to do more to address the commuting problems arising from an imbalance in local house prices and the city's employment profile. The Strategy recognises that the public sector accounts for a large proportion of job opportunities, and that these are generally low paid. The result is that many public sector employees working in the city are forced to commute into the area as they cannot afford local house prices.
- 2.35 In addition, the Economic Strategy recognises that Winchester's own economically active population consists of many graduates and professionals in the knowledge sector (such as engineering, computing, accounting and other business services). The Strategy reports that around 10,000 Winchester residents commute away from the city for their work, often to Basingstoke and London.
- 2.36 In this context, the Economic Strategy is clear that professional Winchester can do more to provide well-paid jobs locally: more opportunities are needed to enable professionals to live and work in the city, building upon the success stories like IBM at Hursley and Arqiva at Crawley Court. This is achieved, the Strategy concludes, by improving the employment infrastructure, and positioning Winchester as a location for new business, especially new low-carbon enterprises.
- 2.37 With proactive marketing as an excellent location for business, in accordance with the spatial vision and including identifying development opportunities in the spatial planning strategy, Winchester could realistically seek to attract demand for a bespoke corporate campus, perhaps similar to Rolls Royce's HQ, Chichester or McLaren, Woking, or perhaps a business cluster based on research and technology, such as Surrey Research Park or Cambridge Biomedical Campus. Without clear signals to the commercial market, however, such high-value and prestigious developments are unlikely to even consider Winchester as an option, despite its obvious inherent attractions, such as the high quality environment and connectivity to other major centres in the region.

- 2.38 With the evidence base identifying a lack of existing modern business premises, and limited scope to address this within the few redevelopment opportunities in the town centre, the opportunity site on the edge of the city is clearly an effective response. Indeed, a key outcome for the Economic Strategy is that Winchester exploits its reputation as a cultural stronghold, using this as means to stimulate a modern and creative approach to business, by identifying a site for a knowledge park in the core strategy.
- 2.39 By identifying the development opportunity at Bushfield Camp in the JCS, the City Council is translating the objectives of its Economic Strategy into its spatial planning strategy and working towards its desired economic outcomes. It is also fully in accordance with the objectives of the NPPF to plan positively to build a strong and competitive economy.

Should the policies be more specific in relation to the amounts and locations of new employment provision to be sought over the plan period? (Question 3)

- 2.40 WT3 is purposefully open-minded as to what type of development may be appropriate, whilst sending a powerful signal to the commercial market that this site is a potential development opportunity. Without this signal Winchester is likely to continue to struggle to attract significant major inward investment and will struggle to make a successful transition from its traditional reliance on the public sector for job creation.
- 2.41 In terms of location, Bushfield Camp was identified by work undertaken by SQW Consulting as preferable location for an opportunity site. While there are undoubtedly other opportunities within the city for (smaller-scale) economic development, Bushfield Camp, because of its potential scale, remains the obvious opportunity to capture an opportunity that could genuinely help reshape and broaden the local economy.

Is it appropriate in principle and reasonable in practice to safeguard existing employment areas and/or should more flexible criteria [such as in relation to economic viability] be used to help make more effective use of brownfield sites [PDL]? (Question 4)

- 2.42 As is clearly identified in the evidence base (DTZ, 2011) WT3 is about capturing bespoke growth opportunities, it therefore is not competing with existing employment sites or potential new sites within the city. Policy WT3, as part of the strategy for Winchester Town, is therefore entirely consistent and complements the policy of safeguarding existing sites. Policies CP8, CP9 and WT3 taken together form a well-balanced employment strategy.

Is the presumption of “town centres first” consistent with national policy in the NPPF and/or justified by clear and robust evidence and appropriate in the local context? (Question 6)

- 2.43 As clarified in the evidence base (DTZ, 2011 and Background Paper 4), policy WT3 is about capturing unforeseen employment growth opportunities to help strengthen the local economy. The policy is clear that any uses that would compete or detract from the town centre would not be supported. Only limited retail uses, if any, are likely to be permissible at Bushfield Camp, if they were clearly complementary to the principal use (as is the case at several existing business parks, for example MEPC Milton Park in Oxfordshire).

3. Environment – Policies CP11 to CP14 (Issue 9)

Are the policies consistent with the NPPF and/or justified by clear and robust local evidence and if not, what needs to be changed and why? (Question 1).

- 3.1 The Church Commissioners wish to rely on their written representations at pre-submission stage on this issue.
- ii) **Are the targets for renewable energy in policy CP11 appropriate, reasonable and realistic, in the light of national policy? (Question 2).**
- 3.2 The Church Commissioners wish to rely on their written representations at pre-submission stage on this issue.

4. Environment – Policies CP15 to CP20 (Issue 10)

Is policy CP15 likely to prove effective in protecting and enhancing existing and delivering new green infrastructure? (Question 2).

- 4.1 It should also be noted that in addition to policy CP15, policy WT3 (Land at Bushfield Camp) has the potential to deliver new green infrastructure. Of the 43 hectares in the ownership of the Church Commissioners on the southern edge of Winchester, around 20 hectares (focused on the footprint of the former army camp) is identified for redevelopment, with the remainder (23 hectares) to be gifted as public open space in perpetuity.

Is policy CP16 likely to provide effective protection for designated sites and appropriate mitigation, where necessary? (Question 3).

- 4.2 As well as policy CP16, policy WT3 affords appropriate protection to the natural environment in respect of the development opportunity at Bushfield Camp.

Is policy CP18 suitable in principle for a CS and does it define appropriate gaps? If not what needs to be changed and why? (Question 5).

- 4.3 Policy CP18 should be reviewed in light of the spatial strategy set out in the JCS. The Compton Gap boundary should be reviewed in respect of policy WT3, which identifies land at Bushfield Camp for development should an appropriate opportunity come forward. In this case, it would be appropriate to review the function and boundary of this local gap in Part 2 of the WDLP.

Are policies CP19 and CP20 likely to provide effective protection for the South Downs National Park and other areas of heritage and landscape character, whilst allowing some limited, suitable and appropriate development to continue? (Question 6).

- 4.4 Development of land at Bushfield Camp (policy WT3) has the potential to impact the setting of the South Downs National Park, and the important historic landscape setting of Winchester. Policies CP19 (South Downs National Park) and CP20 (Heritage and Landscape Character), alongside the strict provisions of policy WT3, will ensure that only development proposals that are conservation-led will be supported. Together these policies provide a suitably clear and robust framework to manage the impacts of development, whilst allowing appropriate opportunities for sustainable growth to come forward in this location, in accordance with the NPPF's presumption in favour of sustainable development. The JCS can therefore be considered to be sound in this respect.
- 4.5 Land at Bushfield Camp is in a sensitive location, and, as was confirmed through the Blueprint consultations, there is public interest about the future of this site. This robust policy framework is therefore justified. As summarised in previous written representations on behalf of the Church Commissioners, however, independent comment from the Academy of Urbanism (September 2011) (appended to this report) suggests that the concerns about the impact of development in this location may be overstated.
- 4.6 This assertion is consistent with detailed cultural landscape appraisal work undertaken on behalf of the Church Commissioners, in liaison with the City Council's landscape officers (please also refer to our comments under Issue 2). This appraisal has helped to demonstrate that a high-quality development can be accommodated whilst respecting the sensitive landscape setting (thereby according with policy DS1). It has identified a series of development principles and objectives that could be used to help manage the visual impact of development in this location, in accordance with policies DS1 and WT3.

5. Transport – Policy CP10 (Issue 11)

Is the policy suitable and appropriate to deliver the necessary transport infrastructure improvements with new developments, including in terms of rail and bus services, park and ride, cycling and walking and, if not, what else needs to be done and why? (Question 2).

- 5.1 It is noted that the Highways Agency has expressed concern that the JCS is not justified in terms of managing transport demand, including in respect of policy WT3 (Land at Bushfield Camp). Policy WT3 is not an allocation but an opportunity site, and therefore it is not feasible, in the absence of a specific use or uses for the site, to be precise at this stage in terms of what highways infrastructure will be needed, or how travel demand will be managed. This is entirely in accordance with the NPPF's emphasis on using a proportionate evidence base.
- 5.2 In exploring the development potential of the site through the JCS preparation process, the Church Commissioners' appointed transport consultant has held initial discussions with Highways Authority to agree a scope for a Transport Assessment.
- 5.3 There is no evidence to date to say that travel demand from development of the site cannot be managed to an acceptable level of impact, on either the local or strategic highway network. Together, the provisions of policies CP10 and WT3, will ensure that development in this location will only be supported if travel demand can be managed to acceptable levels. The JCS can therefore be considered to be sound in this respect and supported by proportionate evidence at this stage.

6. Infrastructure/delivery/flexibility/monitoring and implementation (Issue 12)

- i) **[Infrastructure] - Bearing in mind the funding required, is the overall strategy economically viable and practically achievable in the timescales envisaged and in the forms proposed and, if not, what should be changed to enhance delivery prospects? (Question 1).**

- 6.1 In respect of policy WT3 (Land at Bushfield Camp), this is likely to be a private-sector development with infrastructure requirements funded by the developer.

[Delivery] - Is the necessary public and private sector funding likely to be available to deliver development on the strategic sites and elsewhere in the district, including via the proposed Community Infrastructure Levy? (Question 2).

- 6.2 Please see the comments to Issue 12 (Question 1) above. The Church Commissioners for England, owner of land at Bushfield Camp, confirm that the site is available for development and can therefore be considered available deliverable.

[Flexibility] - Is the CS reasonably flexible to enable it to deal with changing circumstances and, if not, what changes/contingencies would improve the ability to respond to new issues arising during the plan period, such as a lack of investment in major projects? (Question 3).

- 6.3 Policy WT3 gives the JCS flexibility to respond positively to opportunities for private sector led economic growth, in accordance with the NPPF (paragraph 21). Without it, it will be business as usual and Winchester is likely to struggle to attract high value inward investment and would fail to achieve its objective to broaden the local economy in the face of declining employment opportunities and expectation of further public sector cuts. (Please refer to our comments made under Issues 1 and 2).

Appendix 1



Marketing Report

Bushfield Camp, Winchester

Prepared on behalf of The Church Commissioners for
England

Opportunity Site - A Commercial Appraisal

Date of Report October 2012

Knight Frank



Marketing Report

Bushfield Camp, Winchester

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England

Opportunity Site - A Commercial Appraisal

October 2012

Contact details

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Executive summary

Address | Bushfield Camp, Winchester

- Bushfield Camp is a unique “opportunity site”, providing the key ingredients for delivery of high quality commercial accommodation on the edge of the City of Winchester.
- A key driver is to reverse the out-commuting prevalent in Winchester’s higher socio-demographic groups at present, by delivering a compelling employment opportunity for these groups, with accompanying economic spin-offs for the City.
- Appeal to a broad range of occupier markets is seen as critical in a competitive South East real estate market.
- A wide range of commercial occupiers could be attracted to the site from across the South East if the appropriate designation is ratified. A core market area in the central/South Hampshire belt is most likely to generate activity.
- Absolute priority is to secure a designation in the Core Strategy as an “Opportunity Site”, providing scope for development to accommodate a range of functions, to optimise its appeal to the market.



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1 Introduction

- 1.01 The Church Commissioners for England (CCE) have approached Knight Frank LLP, as experts in the South East office market, to review the policy outlined in the Winchester City Local Plan, Part I – Joint Core Strategy, which makes reference to the subject site as an “Opportunity Site”.
- 1.02 Through our understanding of the dynamics of the occupier markets and how these respond to development opportunities, we are confident that Bushfield Camp can offer a deliverable opportunity site, meeting the needs of both the City of Winchester and potential occupiers.
- 1.03 We commence the report with an overview of the site, followed by a summary of Knight Frank LLP’s credential in delivering this report. The combination of accessibility, proximity to the vibrant and attractive City of Winchester, and the unique prospect of a self-contained commercial campus/park provide that Bushfield Camp must be endorsed as a site within the Winchester District, capable of satisfying the objectives of wider economic development policies. This will be achieved by attracting employment-generating development, undertaken sensitively and appropriately.
- 1.04 We then comment on the ability of Winchester to demonstrate that it is ‘open for business’ through the delivery of this site, and can achieve the above objectives. The report then considers the site’s location characteristics, commercial suitability and credentials, on a generic and specific basis, and puts forward a qualitative assessment of the opportunity in a market-facing context. We identify the principal competing region, from an occupier perspective, as well as considering the potential to draw demand from further afield.
- 1.05 Finally, we examine recent trends in take up and offer predictions for future occupier demand, which may emanate from the competing region, as well as further afield in the South East and even internationally.
- 1.06 We have had regard to the Winchester City Council Local Plan evidence base, including:
 - Reports prepared by SQW Consulting in 2007 and 2009.
 - The Winchester Economic Strategy 2010-2015 prepared by Winchester City Council.
 - The review of employment prospects, employment land and demographic predictions authored by DTZ in August 2011.
 - The viability and valuation report prepared by Vail Williams in 2009 and 2010.
 - The infrastructure study and delivery plan report prepared by Winchester City Council in 2011 and February 2012.



- The site assessments relating to biodiversity, landscape, experiential, historic environment infrastructure and contamination, civil aviation height restrictions and physical implications prepared by Winchester City Council in 2008.
 - The Academy of Urbanism's "place partnering" visit to Winchester in September 2011 and the Winchester Vision document prepared by Winchester City Council.
- 1.07 CCE have also prepared a further range of technical reports through specialist consultants.
- 1.08 Knight Frank have had regard to this documentation to ensure that their assessment of site suitability correlates with the opportunities and limitations relating to biodiversity, cultural landscape, transport and utilities, geotechnical, archaeological and tree surveys and other relevant issues.
- 1.09 Knight Frank have also reviewed the report prepared by Roger Tym & Partners, in conjunction with Drivers Jonas LLP (now Drivers Jonas Deloitte), dated November 2009, which aims to define the concept of a "Knowledge Park" and a vision for the Winchester Knowledge Park specifically, together with proposals on its delivery in the context of the CCE's objectives. The Knowledge Park concept is considered further in Section 4 below.

2 Bushfield Camp – Overview

- 2.01 The site is located to the south of the City of Winchester, in the proximity of Badger Farm and St Cross. It affords easy access to the city centre, the M3 motorway (Junction 11) and Park & Ride services.
- 2.02 The site comprises 43 hectares in total and this report considers specifically the development that could be proposed on 20 hectares of the site, which forms the footprint of the old army camp.
- 2.03 The Draft Core Strategy prepared for Winchester District Local Plan, identifies the site in policy WT3 as an "Opportunity Site". This supersedes an earlier version of the Core strategy, which proposed a "Knowledge Park". Roger Tym & Partner's (RTP) report of November 2009 explained the concept of a Knowledge Park and its relevance in providing a significant, new employment opportunity for the City of Winchester. This report outlined the economic vision that would facilitate knowledge-related businesses clustering in Winchester; acting as a catalyst for development, raising the productivity of the local business area, by assisting innovation-based businesses, increasing the dynamism of the local economy, and with this increasing economic resilience. The RTP report also acknowledged the local environmental vision to improve the quality of life, strengthen the environment and deliver a low (or zero) carbon development.
- 2.04 Winchester City Council commissioned SQW Consulting to prepare a report to inform



on the economic and employment aspects of the Core Strategy and the strategy which should be adopted for underpinning and strengthening the district's economic base. In 2007, imperatives included:

- Advancing the concept of smart growth – focusing on higher value-added activities in specific urban areas.
- Seeking to actively support the growth of Winchester's creative and cultural industries which should be recognised as a distinctive local cluster, with clear knowledge-based assets stemming from the University of Winchester.
- Understanding and addressing the economic character and needs of Winchester's outbound commuters – generally, from the higher socio-economic groups.

2.05 SQW Consulting produced a supplementary report in January 2009. Three strategic options were tested:

1. Growth within current plan boundaries
2. Step-changing growth beyond current boundaries
3. Consolidation within existing town boundaries

2.06 Option 2 was found to offer relative advantages over the others, by helping to address the outward commuting issue and to realise the economic development potential of the town. A business park would provide higher income job opportunities in Winchester and would reduce the scale of out-commuting to Basingstoke and London.

2.07 Bushfield Camp was one of 9 employment sites identified in discussions with the Council.

2.08 Knight Frank endorses policy WT3 of the Draft Core Strategy, which broadens the definition of the site to that of an Opportunity Site, as opposed to the earlier version of the Core Strategy, which proposed a Knowledge Park.

2.09 This report sets out to demonstrate that since 2008, economic conditions have deteriorated which has impacted upon corporate activity across all occupier sectors. Market activity (office take up) has reduced by 22% in key Thames Valley markets and Knight Frank Research shows activity outside this core market, for example in the M3 corridor and SE Home Counties has reduced still further by between 25-30%.

2.10 Notwithstanding this, by endorsing Bushfield Camp as a site capable of delivering solutions for the optimum breadth and depth of employment opportunities, Winchester City Council can meet their own aspirations for economic growth through this unique site.

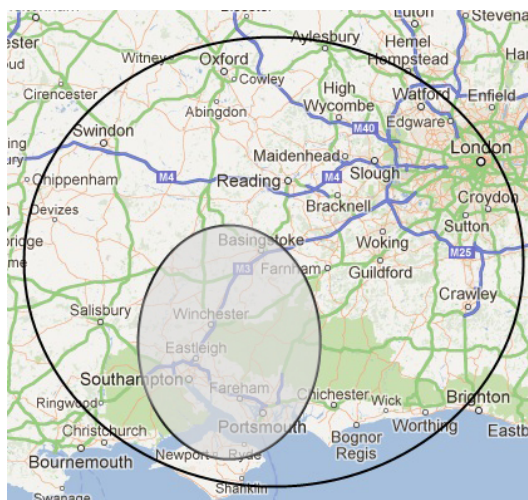


3 Knight Frank – Overview of Experience and Capability

- 3.01 Why are Knight Frank qualified to review the Bushfield Camp opportunity on behalf of CCE?
- 3.02 This report has been authored by Emma Goodford MRICS, Head of South East Offices at Knight Frank. Emma is a Propriety Partner at Knight Frank LLP and has been advising clients across the South East region throughout her career. She has 25 years' experience in this market area.
- 3.03 A copy of Emma's CV can be found in Appendix 1.
- 3.04 Knight Frank LLP is the largest privately owned property consultancy in the UK. It operates in the commercial property market from 12 offices throughout the UK, as well as a far greater number of local and regional residential estate agency premises.
- 3.05 Knight Frank LLP is also considered one of the leading national consultancies in the field of office property, with business parks and other campus-type facilities being a particular speciality. In recent years, Knight Frank LLP has advised on a large number of the most significant business parks, both developing and established, around the UK.
- 3.06 Office agency, development and business park advisory services for the South East are delivered from Knight Frank's 55 Baker Street headquarters in Central London, through its South East Offices team, which comprises 9 full time professionals, all qualified to MRICS or FRICS status.
- 3.07 The team has, in recent years, been involved with a large proportion of the most significant office and business park developments in the key M3, M4 and M25 corridors, including the following:
- Green Park, Reading
 - Farnborough Business Park
 - City Place, Gatwick
- 3.08 In each of the above instances, Knight Frank LLP is/was involved on behalf of the original owner/developer, thereby providing a great depth of experience of advising and consulting on these developments from inception, including full input into master planning, phasing, building configuration and product mix.
- 3.09 In addition to the above, we also have involvement in many other business parks throughout the South East, which are now in piecemeal ownership but nevertheless our experience in the business park field is reinforced. These include Arlington Square Business Park in Bracknell, Ancells Business Park in Fleet, and Thames Valley Park in Reading.
- 3.10 While the wider South East provides potential context for Bushfield Camp, in terms of learning lessons from other commercial development sites, as well as providing the wider landscape for occupier identification, there nevertheless remains a geographical



core area which is particularly relevant to Bushfield Camp. This extends from the mid-section of the M3 from Junction 5 (Hook) southwards to Southampton and the entire length of the M27 from west (Nursling) to east (Portsmouth/Havant). This core area is considered most likely to generate the majority of occupier activity and interest that will have relevance to Bushfield Camp. This is provided (shaded) in the map below.



3.11 Within this core area, we provide below case studies on the following key projects.

Guillemont Barracks – Known today as Sun Park, M3 Junction 4A

- 3.12 Guillemont Barracks was formerly in the ownership of DERA. It was sold in the early 90s to a private developer, Stax Properties, who appointed Knight Frank to advise on the opportunity to create a business office campus.
- 3.13 The site comprises 38 acres, positioned immediately to the north of Junction 4A of the M3. In 1993, outline planning was achieved for just under 400,000 sq ft of office development in a range of individual buildings.
- 3.14 With the benefit of planning consent, the site was sold by Stax Properties to MEPC. As advisers to MEPC, Knight Frank LLP subsequently advised on the sale of the site, for £25m, to Sun Microsystems. Sun Microsystems were seeking to satisfy a large scale campus requirement of 390,000 sq ft for their own occupation. They developed three headquarter buildings through to completion and occupation and erected the steel frames of two more, which could accommodate expansion.
- 3.15 In 2009, Sun Microsystems were taken over by Oracle Corporation. Subsequent to this, the Guillemont Park site was purchased by Delancey. Knight Frank LLP now act as advisers to Delancey and provide marketing and leasing advice, together with alternative use consultancy and agency.

Chineham Park, Basingstoke

- 3.16 Knight Frank LLP act as advisors to MEPC, the owner and developer at Chineham Park, Basingstoke. Set in 95 acres, Chineham Park accommodates over 60



companies, employing 3,500 people in circa 800,000 sq ft of built space. Chineham Park is located on the northern side of Basingstoke town centre, accessed from Junction 6 of the M3 via the Ringway and the A33. Major occupiers include Motorola, Gist, Level 3 and Arjo Wiggins.

- 3.17 Knight Frank LLP are currently advising on leasing and marketing and have provided advice on speculative development, master planning and park amenities/facilities.

The Forum, Solent Business Park

- 3.18 Knight Frank advised PRUPIM (Prudential) on the purchase of 30 acres in the heart of Solent Business Park. This had previously been earmarked for the expansion of Digital/Compaq. Purchased in 1999, the land was masterplanned by Michael Auckett Architects to accommodate up to 600,000 sq ft in 11 buildings. The master plan created a series of lakes, landscaping, car parking, pathways and park amenities. Emma Goodford worked with the team of consultants, advising on the masterplan concept. To date, 295,000 sq ft has been developed in 5 buildings. Occupiers include Regus, Randstad, Specsavers, Datacard and until recently, Meridian TV and Amey.
- 3.19 Emma Goodford also provides advice to occupier clients as part of the service Knight Frank LLP offer in tandem with their Global Corporate Services Consultancy team. Tenant Representation provides an insight of the various inter-competing issues that an occupier considers when formulating a property strategy. This includes Workplace Analysis to interrogate current working patterns and future trends, property specific advice (location, services, brand/image, financial viability), demographic criteria (current workplace and future recruitment prospects), financial and accounting implications.
- 3.20 In 2011, Emma advised Astellas Pharma Europe Limited on the largest corporate acquisition in the South East. Contained in Appendix 2 is a case study, which summarises the acquisition of the former Electronic Arts headquarters at Hillswood, Chertsey. This provided 100,000 sq ft self-contained headquarters, designed by Norman Foster together with an adjacent site which could accommodate a further 100,000 sq ft extension. This strategy involved Astellas combining three current occupations into a single headquarters facility, the exit from three residual lease liabilities and an acquisition on a freehold basis.
- 3.21 A combination of Emma Goodford's market knowledge, combined with her consultancy and advisory roles to developer clients and occupiers, enables her, together with Knight Frank Research, to provide an assessment of the Bushfield Camp project and its future development potential.



4 Planning Overview and Development Potential – Proposals Considered to Date

- 4.01 As indicated in the introduction, Roger Tym & Partners (RTP), with input from Drivers Jonas LLP, prepared a report in November 2009 on behalf of CCE. This explained that the vision for the Bushfield Camp site was predicated on economic, environmental and low carbon visionary statements and how, at that time, they intended to develop a Knowledge Park.
- 4.02 This report recognised that there was no formal definition to the term “Knowledge Park”, which was considered to be a hybrid between a science and a business park.
- 4.03 We are aware of a number of similar park concepts which exist and indeed flourish in the South East. Each has its own specific characteristics, historical background and in some instances, planning requirements. Nevertheless, a thread of commonality exists between these parks, which may be considered a useful model from which to base the “Knowledge Park” concept. They include:
- Milton Park, Abingdon
 - Oxford Science Park
 - Cambridge Science Park
 - Surrey Research Park, Guildford
 - University of Southampton Science Park
 - Norwich Research Park
- 4.04 In each instance, the proximity or affiliation to a university with speciality subjects in relevant fields is a catalyst in the development of the “Knowledge Park”. A similar relationship with the creative and knowledge-based disciplines of the University of Winchester is envisaged at Bushfield Camp.
- 4.05 The RTP report examined how commercial development at Bushfield Camp would support economic and employment strategy, by developing high quality and diverse floor space offerings that could accommodate highly skilled jobs for Winchester’s outbound commuters.
- 4.06 A clear approach to delivery of the Knowledge Park was envisaged, whereby occupiers would be carefully selected, a clustering effect would be a catalyst for further growth and a range of property products would be made available on flexible leases. It also indicated that the entire project could take up to 20 years to develop to a state of full occupation.
- 4.07 Having had regard to the Knowledge Park concept, we must now review the subsequent identification of the site in the Draft Core Strategy as an “Opportunity Site”,
- 4.08 We commence this with the report’s challenge to Vail Williams’ assertion that



knowledge park development at Bushfield Camp would struggle in terms of commercial viability.

- 4.09 Knight Frank agrees with the RTP report in challenging Vail William's assertion, in so far as it may be applied to a slightly wider commercial use for the site. . Firstly, in creating a new unique destination at Bushfield Camp, within the city of Winchester but with a wider regional appeal, it is not appropriate to solely use the existing local market comparables in order to ascertain viability.
- 4.10 The general shortage of new or modern offices and commercial accommodation within Winchester has resulted in extremely limited evidence being created that provides a meaningful comparable for the delivery of brand new, campus style accommodation at Bushfield Camp. This shortage of relevant comparables is primarily due to the historic and physical constraints of Winchester town centre and the limited quantum of business park accommodation (largely confined to the small business park at Kings Worthy).
- 4.11 The context for new development at Bushfield Camp, and the likelihood of occupier requirements with specific needs, may determine that commercial transactions will be focused more on delivery of accommodation of the appropriate size, configuration and quality, rather than with reference to headline rental evidence from the immediate local area, which may be misleading. The focus on the solution, rather than solely on pricing, is considered particularly relevant when viewing Bushfield Camp as a regional property product.
- 4.12 Since the preparation of the RTP report in 2009, we can see that the current WT3 policy now identifies the site in the draft Core Strategy as an Opportunity Site. In our view, to achieve commercial development success, the site must be able to accommodate the broadest range of occupier sectors.
- 4.13 Based on a detailed landscape and environmental appraisal, Terence O'Rourke has suggested that the site could deliver approximately 600,000 sq ft of development, in a sensitive, sustainable master plan.
- 4.14 At Section 9 below, we detail occupier demand in the competing region and, when this is applied to a development of the size envisaged by Terence O'Rourke, it is clear that the life of the project could be upwards of 15 years. The flexibility provided by designation, together with the criteria to be satisfied when development takes place is, in our view, the favoured way forward for this site.
- 4.15 Assuming Bushfield Camp is designated as an opportunity site is it considered suitable for employment generating uses, subject to the credentials considered below.
- 4.16 This next section gives a qualitative assessment, covering all aspects relating to successful business campus development. These observations are drawn from Knight Frank LLP's experience of master planning, marketing, leasing and financially assessing the business park and campus developments across the South East and by reference to site specific issues.



5 Location Characteristics

- 5.01 This section considers the location characteristics of Bushfield Camp, firstly on a generic basis and then specifically, to test the suitability of the site for Business Park/employment generating use.
- 5.02 We consider the location and the context of the site, adjacent to the City of Winchester. Our comments are divided into a number of sections, each commenting on generic and then specific factors.

5.1 Macro Location

Generic

- 5.1.1 The South East economy is ranked as the second best performing economy in the UK, outside of central and Greater London. In this context, a site allocated for business/employment use would be positioned to benefit from demand that this region may generate.
- 5.1.2 The range of business sectors active in the South East show a diversity which has allowed the region to show some resistance to the downturn in the economy which followed the banking crisis in 2008, nevertheless occupier demand/take up is currently 22% below the 10 year average.
- 5.1.3 Key sectors which are generating demand for offices include; financial and business services, technology and communications, pharmaceutical and healthcare, utilities and manufacturing (with fast moving consumer goods predominantly driving this sector).

Specific

- 5.1.4 The Review of Employment Prospects, Employment Land and Demographic Projections report prepared by DTZ, on behalf of WCC, considered Employment projections by applying Oxford Economics projected employment growth rates by sector for Hampshire and the Isle of Wight, to the current sector employment profile in the Winchester District (2009).
- 5.1.5 Total employment will increase from 2012 driven by the services sector (which accounts for 95% of all employment in Winchester District) with production and construction expected to decline beyond 2014/15. Total employment is expected to grow by 7,580 jobs (11%) from 2009-2025. Specific to Winchester growth is forecast in the services sector, which will generate a further 8,010 jobs in Winchester to 2025 (an increase of 13%), the main sectors being business services, health, distribution and retail, hotels and catering and other services (which include arts and recreation).
- 5.1.6 In line with many other regional UK centres, Winchester is expected to show a minor reduction in Financial Services and Public Sector/Administration. These are in line with tighter financial regulation, a risk averse approach and the continued uncertainty in the Eurozone plus the tightening of fiscal policy in the public sector



affecting policing, education and health.

- 5.1.7 Knight Frank considers the Bushfield Camp location as being capable of benefitting from the robust nature of the local economy and, assuming services sector employment continues to grow as forecast, Winchester will benefit from the development of a business park capable of capturing occupier demand that this growth will generate.

5.2 Micro Location

Generic

- 5.2.1 Proximity to an affluent town or city centre can be demonstrated as a key criteria which leads to the success of a business park. This is due to the relevance of a range of factors.
- 5.2.2 The quality of residential accommodation, providing lifestyle for all sections of the workforce from support to managerial staff; the provision of secondary and further (college and university) education, defining the provision and quality of the local workforce; and finally the availability of amenities in the local environs, including retail, hotel and recreational facilities.

Specific

- 5.2.3 The adjacency of Bushfield Camp to the City of Winchester itself, is a significant advantage that will contribute to the potential success of a business park development. Winchester and the surrounding hinterland are generally considered extremely attractive as a place to live. Quality and breadth of provision of housing supports managerial, administrative and support workforces.
- 5.2.4 Current commuters leaving Winchester every day can therefore be encouraged to both live and work in the city, if business opportunities can be created to allow this to happen. Local educational facilities, at all levels, also allow employers to draw on a quality workforce located on the doorstep.

5.3 Communications

Generic

- 5.3.1 To achieve success, a business park must offer a comprehensive cross section of communication opportunity. Excellent road, rail, air transport are key factors as are both public and private transport by car, bus and bike.

Specific

- 5.3.2 We understand that Bushfield Camp will be accessed via the existing/previous site entrance from the A3090 Badger Farm Road. The site is within close proximity to Junction 11 of the M3, which provides the essential link needed for the site to be considered suitable for business park/knowledge park development.
- 5.3.3 Winchester rail station has dual advantages. To the north, it accesses Waterloo in 58 minutes (fastest service) and to the south there is a direct rail link to



Southampton Airport Parkway which access the airport for international travel. While Heathrow Airport carries 60-70m passengers annually, Southampton is considered an excellent alternative by many corporate occupiers, particularly for European access.

- 5.3.4 Locally, the Bushfield Camp location is served by the Park & Ride bus route to central Winchester via Badger Farm Road (864 car spaces currently) adding another dimension for access to this pitch. We would envisage that the master plan for the park would accommodate a network of roads, cycle pathways and pedestrian routes to provide for diversified means of travel connecting the site to other parts of the city.

6 Masterplan – Park Design and Market Positioning

- 6.01 As described in Section 3 above, Knight Frank LLP has a considerable track record in advising land owners and developers in master planning business parks. Design has evolved significantly since the establishment of the early forerunners in the mid 1980s, which included Globe Park, Marlow and Stockley Park, Heathrow.
- 6.02 Terence O'Rourke have undertaken feasibility studies to assess the quantum of space that would be suitable for development at Bushfield Camp and the high quality design must be sensitive to the land holding and the surrounding area. Several factors are key, which are described below.

6.1 Infrastructure

- 6.1.1 The design and development of the entrance to the park, creating a sense of arrival and destination is critical. Thereafter, roads, paths and cycle ways are designed and developed to achieve a cohesive design. The provision of private or community parking is also key to the success of edge of town development.
- 6.1.2 Planning standards have demonstrably tightened since the late 1990s, with greater emphasis on public transport, but as the workforce is drawn from a disparate range of locations, the need to allocate parking remains a key priority for corporate occupiers.
- 6.1.3 We understand that Hampshire County Council parking standards are to a maximum of 1 space per 30 sq m (subject to overall accessibility considerations). Delivering this ratio, or close to it, at Bushfield Camp would provide an adequate provision for a development in this location, in our opinion.

6.2 Buildings

- 6.2.1 As well as being of a high-quality, and appropriate to the landscape setting, the design of buildings must combine modern specification, flexibility and sustainability credentials, to appeal to the widest range of office and commercial occupiers.
- 6.2.2 A range of building sizes, designed to provide stand-alone HQs, or be combined to accommodate larger requirements should be designed. Architectural style will be



driven by the architectural team and for a park of this size several architects may be commissioned to design buildings creating a breadth of choice.

- 6.2.3 The design must incorporate an assumption of phasing and “protect” early phases from later phases, minimising disruption to the early occupiers. While a master plan may show specifics, it must be designed to be adapted as demands change over the years and as occupiers are accommodated through pre let design.

6.3 Amenities

- 6.3.1 The Bushfield Camp location affords access to nearby retail facilities (particularly the Sainsburys supermarket off Badger Farm Road) as well as the leisure/amenity provided in the city itself and the nearby Itchen Valley.
- 6.3.2 Increasingly, business parks in excess of 500,000 sq ft provide a range of amenities situated on the park. This is a reaction to the working population’s increasing demand for a work-life balance during the working day. The proximity of Winchester itself to Bushfield Camp may dilute the onsite requirements of occupiers, however.
- 6.3.3 By reference to competing business park schemes in the region, a typical spread of amenities might include neighbourhood retail, child’s day nursery, pub, healthcare facility, hotel, health and fitness club. These facilities help create a community for businesses, and also for residents from surrounding areas.

7 Achieving Commercial Credibility

- 7.01 Of utmost priority in bringing forward Bushfield Camp is the need to secure the appropriate designation in the Core Strategy. The site will then achieve the first-stage credibility which will be necessary in order to then progress towards a planning application, which is CCE’s intention.
- 7.02 After reaching this initial milestone, there are several factors which an occupier will consider when making their selection of the location for their new office premises. An extant planning consent and agreed undertaking connected with any associated Section 106 agreements would then logically follow. We would expect a park of this nature to demonstrate a proposed master plan and ideally have developed main access points with some element of estate servicing and landscaping. The provision of services (power and telecommunications) is also a key consideration.
- 7.03 Our experience as consultants on a range of business parks across the South East region emphasises that planning permission is critical to the success of Bushfield Camp if it is to become established as a key Business/employment opportunity in Winchester. At this early stage the allocation of the site as an “Opportunity Site” enables the owner to take a specific planning proposal to the next stage.



8 Promotion/Marketing

- 8.01 Establishing a strong brand is critical to the success of a business park. The development of a branded set of marketing collateral will be essential. This will include site based collateral such as marketing boards, marketing suite, plot presentation, web based materials, plus brochures and an advertising campaign.
- 8.02 The marketing campaign will promote the unique selling points for the park, emphasising strengths and opportunities while addressing weakness and threats. This will largely be a SE UK focused promotional campaign but through the involvement of an international marketing and leasing consultant, international audiences can also be captured.
- 8.03 Research will be utilised to identify potential occupiers which will analyse growth sectors, particularly business services, identify lease events, which in the current market are a key driver for relocation, predict merger and acquisition activity which may lead to office requirements and enable a targeted occupier marketing campaign to take place.

9 Demand

- 9.01 As indicated in sections 1 and 3 above, we consider that the majority of commercial occupier demand, likely to be of relevance to the development at Bushfield Camp, will be derived from the core area, defined as being the lower part of the M3 from Junction 5 going south, together with the M27 from Nursling in the west to Portsmouth/Havant in the east.
- 9.02 Certainly for organisations or businesses seeking new or relocation accommodation of 20,000 sq ft or less, this core area is likely to form the realistic limit of relocation for many. This is due to a number of factors, including in particular the relocation payments or constructive dismissal compensation cases which are a significant factor in the market at present. Other key factors include proximity to clients and suppliers, longevity of local business relationships, and, even in 2012, residential addresses of senior members of staff.
- 9.03 As provided above, in order to maximise the commercial appeal of Bushfield Camp and benefit from the economic growth for Winchester this would deliver, a range of differently sized (and possibly differently priced) opportunities will need to be provided. The “seed bed” requirements of many knowledge based industries will form an important part of this. Given the likelihood of a local affiliation/connection, for such smaller organisations this core area therefore needs to be a particular focus for identifying such occupiers.
- 9.04 Again with regard to this local market area and locally driven demand, we give considerable regard to the relevance of relocations driven by lease breaks and expiries. These provide a significant source of occupier relocation demand as existing leases approach breaks or expiries, with occupiers thereby having the



chance to reconsider the quality and longevity of their existing accommodation.

- 9.05 Appendix 3 indicates the quantum of lease breaks and expiries registered by Knight Frank between 2013 and 2017 in the core area. The overall quantum of such lease events is well in excess of 1m sq ft across these 5 years and provides significant target market, particularly for any smaller units of accommodation that may be deliverable or delivered at Bushfield Camp.
- 9.06 Take-up also provides a useful guide as to likely levels of future activity. Appendix 4 details take up in the core market are over the past 10 years. This largely follows the general economic cycle but also demonstrates a healthy year-on-year market with average annual take up of circa 150,000 sq ft.
- 9.07 However, the above comments do not preclude Bushfield Camp from providing a suitable solution for organisations from further afield; in particular, the larger campus-type solutions, commercial premises totalling, say, 150,000 sq ft or above.
- 9.08 By reference to Appendix 5, which is a schedule of lease events in the Thames Valley office market between 2013 and 2017, a significantly higher annual prevalence of lease events is apparent, with a total of around 13m sq ft of lease event driven opportunities. This accurately reflects the greater overall quantum of commercial space in the Thames Valley versus the M3/M27 area and also provides an additional marketplace which may be tapped into particularly for large scale organisations which may be considered relocation targets on a more footloose basis.
- 9.09 However, such requirements are generally longer terms strategic moves, so whilst lease events may be exploited to best effect, these often do not play a major part in such a relocation, the other business benefits significantly outweighing the property cost.
- 9.10 The suburban South East and in particular Surrey, Hampshire and Berkshire is home to a large number of major blue-chip organisations who seek a campus environment in striking distance of London and the international airports, but with a number of significant associated benefits.
- 9.11 These include: the ability to secure bespoke facilities designed to the occupier's particular requirements; ring-fenced accommodation, providing autonomous security to the appropriate level; large, flexible floor plates, allowing greater business integration such as are generally only found on out of town locations such as business and science parks; easily accessible locations preferably with close proximity to motorway junctions; and finally, an attractive low density environment with appealing landscaping, providing an attractive work-life balance – and in locations within close proximity to a wide range of attractive residential property for highly trained and remunerated professional/managerial staff.
- 9.12 Across the South East, a large number of significant businesses operate from such campuses, including the following:
- Exxon Mobil (Leatherhead)



- Unilever (Leatherhead)
- Siemens (Frimley)
- MacLaren Racing (Woking)
- Oracle (Reading)
- Centrica (Windsor)

9.13 In addition to the above, in Hampshire itself, we would point to the following campus environments, either purchased or leased by significant occupiers seeking to match the above occupational criteria.

- CSC Computer Science, Royal Pavilion, Aldershot (site purchased by Knight Frank) (300,000 sq ft approx)
- Sun Microsystems/Oracle Campus at Guillemont Barracks, Junction 4A, M3 (280,000 sq ft approx)
- QinetiQ Campus, Farnborough (1m sq ft approx)
- Raymarine, North Harbour, Portsmouth (100,000 sq ft – re-let to Pall Europe)
- IBM Campus, North Harbour, Portsmouth (600,000 sq ft- IBM presence now downsized to circa 300,000 sq ft)
- Ordnance Survey, Nursling near Southampton (100,000 sq ft approx)
- Lloyds Register/University of Southampton Centre of Excellence (70,000 sq ft approx).
- Zurich Insurance, Solent Business Park, near Fareham (160,000 sq ft approx.)

9.14 By reference to the above, we consider there to be significant evidence within Hampshire of major organisations from a broad range of sectors, who might consider Bushfield Camp as a viable location for a facility of this nature, fulfilling or being capable of fulfilling all of the above key criteria which typically apply to such relocations.

9.15 For the avoidance of doubt, we did not exclude from this opportunity group the possibility of either attracting relocation from further afield within the UK or indeed new facilities being developed by an organisation from overseas as a first step into the UK.

10 Competition

10.01 Levels of potential competition for Bushfield Camp, as a solution for occupiers may be considered to follow the same principles as demand in Section 9 above. For smaller units of accommodation, a more local market context is likely to be relevant,



in particular the prevalence of existing built stock suitable to smaller occupiers of say, 20,000 sq ft and below.

- 10.02 Such occupiers will almost certainly acquire accommodation that is built and immediately available to let, as opposed to taking pre-let commitments. Larger enquiries will be increasingly likely to have the sophistication required to consider fully pre-let options from plan, although this does not preclude them from considering existing stock, should their timetable dictate.
- 10.03 As an Opportunity Site, which can accommodate a range of commercial uses, Bushfield Camp would find its primary competition as stated above in the lower M3/M27 area. A limited number of key sites would probably provide the most likely competition.
- 10.04 Southampton Science Park (formally Chilworth Science Park) would present probably the most relevant competitor scheme in close proximity, particularly with reference to scientific or research-led operations. We are aware that this currently offers a range of accommodation sizes immediately, up to circa 16,000 sq ft. In addition, we are aware of the opportunity to purchase and on a long leasehold basis to construct bespoke premises.
- 10.05 Slightly further afield, competition would include Solent Business Park near Fareham, which provides a low density campus environment with circa 500,000 sq ft of vacant land immediately available via two landowners, PRUPIM and Goodman.
- 10.06 Also worthy of mention in the greater Southampton area is Adanac Park, at Nursling on the western side of Southampton, a 75 acre campus which has already secured a preletting to Ordnance Survey and current planning permission allows a further 5 large occupiers of circa 100,000 sq ft each.
- 10.07 At the eastern end of the M27 is North Harbour Business Park, formally owned by IBM and now owned by Highcross with IBM as a tenant of circa 300,000 sq ft. Here, significant pre-lets may be secured in a series of buildings from 25,000 sq ft upwards with a total quantum deliverable of in excess of 1m sq ft.

11 Conclusion

- 11.01 We have demonstrated above our market experience and credentials in providing this report for the CCE. We have considered the locational attributes of the site, together with Winchester itself, and combined these with our understanding of local and regional occupier markets, particularly with reference to business parks, and other campus-style accommodation. We consider that Bushfield Camp meets the principal criteria necessary to deliver such a solution, particularly assuming the ability to pursue a wider audience of commercial functions rather than those captured by the more prescriptive “knowledge park” concept.
- 11.02 In conclusion, Knight Frank LLP strongly supports the pursuit by CCE of the designation of Bushfield Camp as an “Opportunity Site”, thereby optimising the



prospect of commercial development which is likely to support and indeed, enhance, economic growth for the City of Winchester.



Appendix 1 - Emma Goodford CV



Emma Goodford



Proprietary Partner

Qualifications

MRICS

Career

2006	Proprietary Partner
2006	Head of South East Offices
1996	Partner
1992	Associate
1987	Knight Frank LLP

Major clients

AXA REIM, Barclays Bank Plc, Doughty Hanson & Co, JTI/Gallaher Ltd, Liberty Property Trust, PRUPIM, Quadrant Estates, PGS, IVG, The Crown Estate.

Emma Goodford heads the South East Offices Department based in Baker Street, Central London.

25 years' experience in the M25 and south east UK office markets, specialising in development and consultancy for town centre, mixed use and business park schemes. She takes a direct role in consultancy for masterplanning business parks, structuring and co-ordinating marketing campaigns for agency instructions, and negotiation and disposal advice to developer and institutional investor clients.

The department she heads provides office agency, Tenant Representation/occupier acquisition, development brokerage, consulting and lease advisory services and valuation advice.

Recent transactions

Kings Hill

Kent

www.kings-hill.com

2million sq ft business/mixed use campus. Masterplan consultancy, disposal/marketing co-ordination and transaction advice. Advisors to Liberty Property Trust UK, Doughty Hanson and Kent County Council since 1993, and 850,000 sq ft has been leased to date.

City Park, Brighton

200,000 sq ft, three building campus. Leased on behalf of Mountgrange to Legal & General. Development consultancy and leasing advice provided.

PGS (Petroleum Geotechnical Services)

Receiving the Brief of relocating three PGS offices within the Greater London area, to a new UK Headquarters at The Heights, Weybridge, Surrey, comprising 75,000 sq ft. The project involved search, negotiation, financial appraisal, building consultancy and legal advice.

Astellas Pharma Europe Ltd

Rationalisation of 3 office properties in Staines on Thames. Identification and negotiation to agree the freehold purchase of the former Electronic Arts HQ, Building 2000 Hillswood Chertsey- designed by Norman Foster plus adjacent site for expansion. This was the largest SE occupier acquisition in 2012.



Appendix 2 - Case Study – Astellas Pharma HQ Acquisition

CASE STUDY

Knight Frank



ASTELLAS PHARMACEUTICALS LIMITED – HEADQUARTERS ACQUISITION

Assignment Acquisition of new UK Headquarters and relocation from existing facilities.

Size 100,000 sq ft

Transaction Agreed Purchase of 2000 Hillswood Business Park, Chertsey from Electronic Arts, together with adjacent development land.

Deal Freehold purchase for owner –occupier (confidential price) and additional consented expansion land for up to 100,000 sq ft.

Date September 2011

Summary Astellas is one of the top 20 pharmaceutical companies in the world, employing 16,000 people globally, and is primarily involved in developing best in class products in key therapeutic areas. In 2011 global sales reached almost 1 trillion yen.

The acquisition of 2000 Hillswood represented an opportunistic consolidation of several offices located in and around Staines to produce a single Headquarters function.

Knight Frank Knight Frank provided:

- Services**
- ◆ Initial staff assessment and workplace study
 - ◆ Full financial appraisal of existing liabilities
 - ◆ Property search and report
 - ◆ Identification, negotiation and acquisition
 - ◆ Legal consultancy
 - ◆ Building consultancy – surveys
 - ◆ Rates consultancy
 - ◆ Initial fit out and planning consultancy

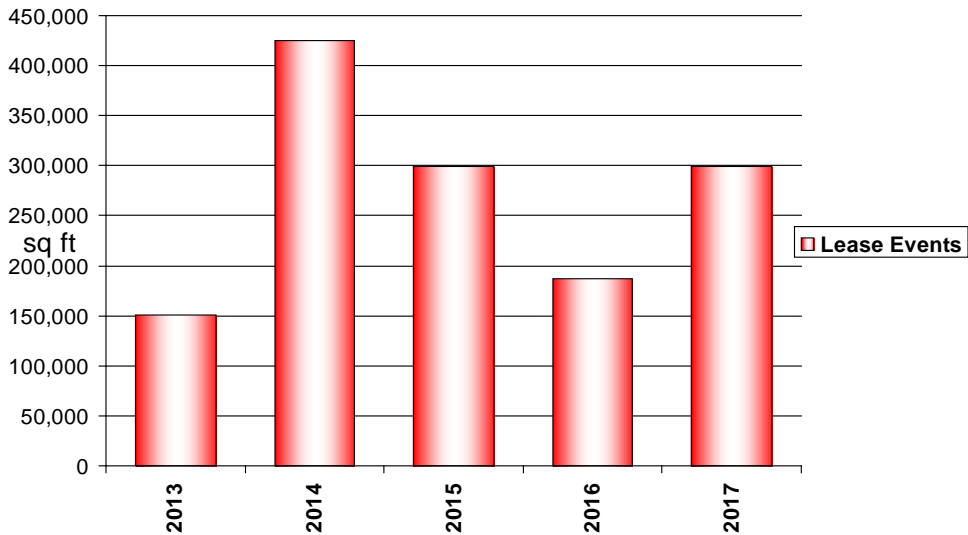
Client Comment *“Knight Frank played a key role in helping Astellas acquire our new 100,000 sq ft EMEA headquarters. Whilst we had been considering moving from 3 separate buildings in to one for some time, once the decision to go ahead was taken, their help and insight ensured we could complete the deal very quickly & move from first offer to exchange in just 8 weeks.”*

Allan Wilton, Director Procurement



Appendix 3 - Lease Breaks and Expiries in the Core Area (2013 – 2017)

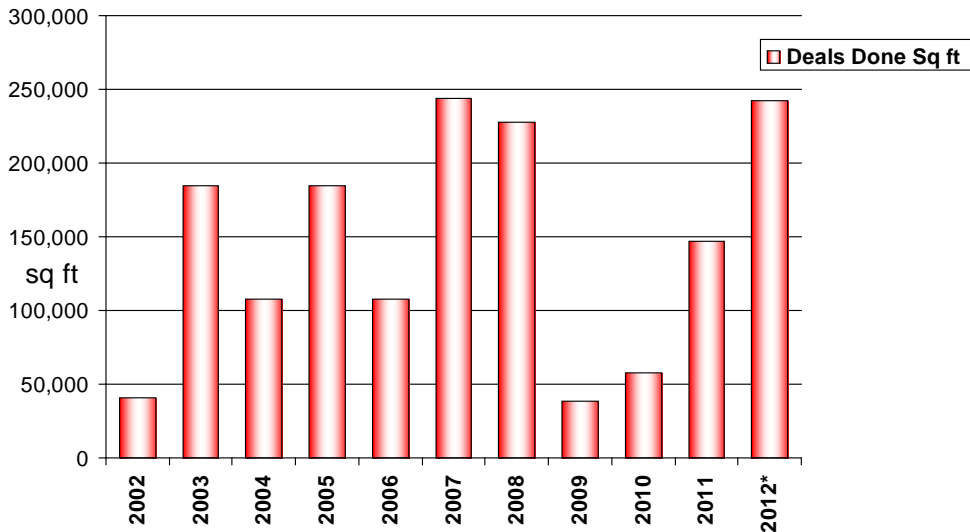
Southern M3 & M27 Business Park Lease Expiries & Breaks





Appendix 4 - Office Take Up in the Core Area (2002 – 2012)

Southern M3 & M27 Annual Business Park Deals Done 20,000 sq ft +

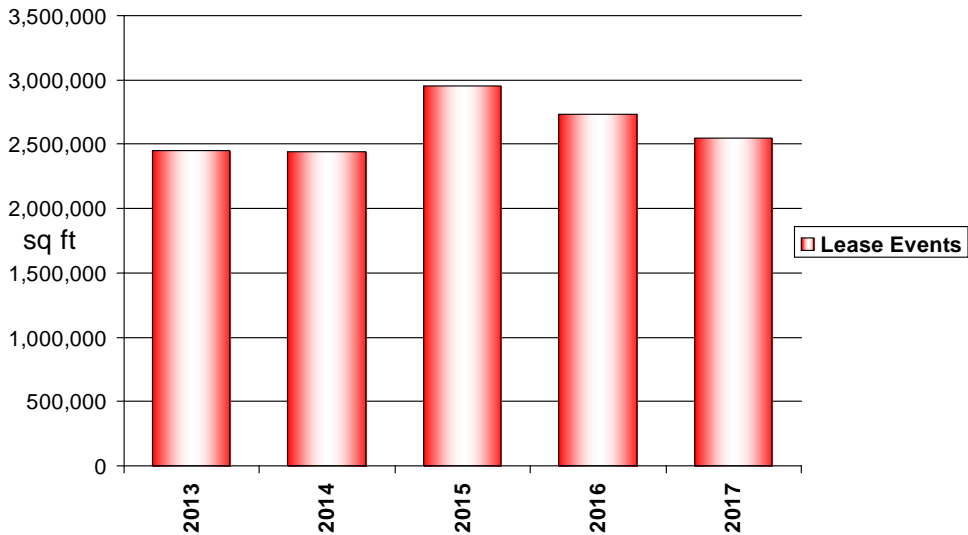


* Year to date



Appendix 5 - Lease Breaks and Expiries in the Thames Valley (2013 - 2017)

Thames Valley Lease Expiries & Breaks



Appendix 2

Appendix 2

Assessment of Alternative sites

1. Introduction

- 1.1 Appointed by Winchester City Council, SQW Consulting Ltd undertook an employment land review in 2007. This included identifying potential opportunity sites to help deliver economic growth and diversify the local economy.
- 1.2 The following sites were identified by SQW as meriting consideration as opportunities for economic development:
 - Bushfield Camp
 - Bar End
 - Barton Farm
 - Littleton Royal Training Barracks (Sir John Moore Barracks)
 - Former HMS Dryad
- 1.3 This study is now more than 5 years old and therefore needs refreshing and revisiting in light of the evolving understanding of what type(s) of economic development an opportunity site is likely to deliver.
- 1.4 Since 2007, the UK economy has been hit by recession and in 2012, continues to be facing difficulties, but with signs of slow recovery. In publishing its National Planning Policy Framework (NPPF) earlier this year, the Government has identified a clear need to restructure the economy to meet the *'twin challenges of global competition and of a low carbon economy'* (paragraph 18).
- 1.5 Winchester like most other cities in the UK, needs to plan for its economic future if it is to remain buoyant. This has been recognised in the City Council's Economic Strategy 2010 to 2020.
- 1.6 The evidence base for the Winchester Local Plan Part 1 identifies that the local economy is heavily dependent on public sector jobs and should do more to create and retain more private sector employment opportunities. A key outcome of the Economic Strategy is to deliver a 'knowledge park' for the city, to help diversify the economy and capitalise on the local economy's strengths in the knowledge-based and creative industries. This is something different from standard B uses in terms of quality and format.
- 1.7 The need for this boost to the qualitative offer or employment accommodation in Winchester has grown since 2007 and the onset of economic recession, the climate of public sector cuts and increasing global and inter-regional competition.

- 1.8 Winchester CC employed consulted DTZ to refresh its economic evidence base in 2011¹. According to DTZ (page 29) an implication of Winchester's updated employment land requirement is that the case for a knowledge park is much more about generating job growth and changing the employment profile of Winchester than about providing space for projected demand.
- 1.9 The table presented in Appendix A summarises the findings of the SQW assessment in 2007, and expands it to reflect on the original opportunity sites in the context of a growing need for local economic restructuring. It also updates the assessment of opportunity sites to include other sites that have emerged through the consultations on the emerging core strategy since 2007. These sites are identified in Appendix B.

2. Additional site opportunities

- 2.1 In addition to the potential opportunity sites identified by SQW in 2007, the following sites have been mentioned during consultations on the emerging core strategy:
- Carfax site
- 2.2 This site adjacent to Winchester station may be available for redevelopment over the plan period. It has excellent accessibility in terms of public transport, given its edge of centre location by the station. It is, however, a constrained site in terms of available land and is relatively remote from the strategic road network. It maybe suitable for further consideration for small-scale employment development, but is too constrained to be attractive for a larger-scale, employment opportunity.
- Cattle Market Car Park
- 2.3 Comments applied to the Carfax site apply to Cattle Market site: good accessibility by public transport and a potential opportunity for small-scale employment development.
- Winchester Police HQ, Romsey Road
- 2.4 Should Hampshire Police release the site for redevelopment, it is likely to have potential for some small-scale employment development. The site may also be suited for residential development. In common with the Carfax and Cattle Market sites, this is a relatively small site meaning it is not suited to a larger-scale employment opportunity.

¹ Review of Employment Prospects, Employment Land and Demographic Projections, DTZ, August 2011

3. Review of opportunity site assessment

3.1 The potential opportunity sites for the Winchester Town spatial area fall into three broad categories:

a) Opportunities for redevelopment within the city

3.2 There are opportunities within the established development boundary of Winchester that could, disregarding availability and deliverability issues, be appropriate for redevelopment to provide new business accommodation. Many of the sites benefit from excellent accessibility. They are, however, unlikely to be able to accommodate the quantum of floorspace necessary for a knowledge park or similar business cluster development. There are also significant availability and deliverability issues that would need to be resolved before the it would be appropriate to consider the sites as development opportunities within the core strategy.

3.3 The sites falling into this category are:

- Carfax site
- Cattle Market
- Winchester Police HQ

3.4 Each of these sites is likely to be appropriate for further consideration to provide smaller-scale economic development over the plan period, and through the WDLP Part 2.

3.5 Bar End is also a theoretical opportunity within the city, with greater scope in terms of land scale to capture a large-scale employment opportunity. This site would involve loss of playing fields, which would presumably need to be reprovided in a suitable location. The City Council is not promoting this site as a development opportunity.

b) Edge of settlement opportunity sites

- Barton Farm

3.6 Land at Barton Farm to the north of the city, and Bushfield Camp to the south, are the two sites identified on the edge of the settlement and with realistic prospect of being successfully integrated into the city over the plan period.

3.7 Barton Farm is allocated for a strategic housing scheme to deliver the majority of housing need for the city over the plan period. Provision of a knowledge park or other large-scale, bespoke business development would therefore be in conflict with the strategic purpose of this allocation.

- Bushfield Camp

3.8 Land at Bushfield Camp, the footprint of the former military camp, is considered by Winchester CC not to be appropriate for strategic housing. There are constraints to development, notably the historic landscape setting, that would need to be addressed but the site, owned by the Church Commissioners for England, is available and remains a development opportunity worth detailed consideration. This opportunity is reflected in the WDLP Part 1 under policy WT3.

- Land north of Well House Lane (Bovis Homes/Heron Land)

3.9 This site north of the Barton Farm housing allocation is being promoted by Bovis Homes/Heron Land as a potential sustainable location for a knowledge park of around 20 hectares. While in principle this site is of a scale that has potential to be suitable for a knowledge park development in the future, until the strategic housing development at Barton Farm is well advanced, it is remote from the city rather than genuinely edge-of-settlement. It is a greenfield site.

c) Other potential opportunity sites

3.10 Some sites identified by SQW as potential opportunity sites are remote from Winchester city and can therefore be categorised separately. St John Moore Barracks to the northwest of the city, is an operational MoD site (Army Training Regiment) and there is no indication that this is, or will soon be, available for redevelopment.

3.11 The Former HMS Dryad site is outside of the Winchester Town spatial area and therefore not an option for capturing employment opportunities that could help to strengthen the Winchester Town economy.

4. Conclusions

4.1 An objective of the WDLP Part 1, and the vision for Winchester Town, is to diversify the local economy through the promotion of the knowledge, tourism, creative and education sectors (policy WT1) and in response to this vision the Council has identified an opportunity site to accommodate a knowledge park or similarly bespoke business cluster development so that the city is better prepared to respond to opportunities to help restructure the local economy.

4.2 Many opportunities within the established city are not suitable for this purpose, in terms of physical constraints and timescales for deliverability. Of the available sites on the edge of the city, land at Barton Farm is identified for strategic housing and is therefore already playing a major part in the growth strategy of Winchester Town. The site now benefits from planning permission.

4.3 Land north of Well House Lane is being promoted for a knowledge park. In principle this land may be suitable in the future for employment land, but until the scheme at Barton Farm is substantially built-up, this location is not genuinely edge-of-settlement. It should not therefore, be the first option for an

opportunity site if there are other options available now on the edge of the city.

- 4.4 Land at Bushfield Camp therefore remains the obvious location for this opportunity. It is available early in the plan period should a bespoke development need emerge. It has development constraints, notably potential impact on the historic landscape setting of the city, but with an appropriate policy framework to strictly manage the type, design and form of development, it is the most appropriate option in Winchester Town for the objective of capturing a major employment growth opportunity over the Plan period.

Appendix A - Bushfield Camp – Review and update of the SQW Sites Assessment (2007)

Site name	Description	Local Plan status	SQW assessment description	SQW score	Further comments at 2012
Bar End (north of M3 Junction 10) SQW site 38)	<ul style="list-style-type: none"> • South West Winchester, north of J10 of M1 • Open land • Informal playing fields 	<ul style="list-style-type: none"> • Countryside • Adjacent to East Hampshire AONB • Central section of site susceptible to 1 in 100 year floods 	1. Large flat open area	8	<p>Positives:</p> <ul style="list-style-type: none"> • Good links to strategic road network • Proximity to the town centre • Part of site previously developed • Direct relationship to southern boundary of Winchester City <p>Constraints:</p> <ul style="list-style-type: none"> • Loss of playing fields/green infrastructure • Potential open views to South Downs National Park • Potential noise issues associated with proximity to M3 • Part of site susceptible to flooding <p>Conclusion: WCC owned land; loss of a significant community recreation asset, would need to be reprovided. Not suitable for</p>
			2. Potentially good market demand	8	
			3. Very attractive environment	8	
			4. No apparent development constraints but major infrastructure required	7	
			5. Potentially very good site access and accessibility	8	
			6. Could reduce net out-commuting	7	
			7. Potentially strong contribution to evolving employment sub-regional growth strategy	7	
			8. Major boost for growth of knowledge base activities	8	
			9. In sequential terms is edge of settlement	7	
			10. Boost economic image of Winchester	8	

					an opportunity site in the WDLP Part 1.
					76
Bushfield Camp (SQW site 39)	<ul style="list-style-type: none"> • Large area of search on former MOD site • Part of site overlooks Winchester City • Retains many roads, pathways and foundations of old buildings 	<ul style="list-style-type: none"> • Countryside • Winchester-Compton Local Gap • Part of site allocated for provision of facilities for open sports, informal recreation and small-scale tourism • Site is also considered to offer an opportunity for providing a Park and Ride facility • Large area is locally designated as a SINC 	1. Large sloping area	7	Positives: <ul style="list-style-type: none"> • Good links to strategic road network • Proximity to the South Winchester Park & Ride, with regular bus services passing the site to/from town centre. • Part of site previously developed (footprint of the former military camp) • Direct relationship to southern boundary of Winchester City • Opportunity for much of the land in same ownership to be gifted to WCC as public open space. • Site is available and being promoted by the landowner for redevelopment. • Development potential of site identified through emerging local plan policy (policy WT3)
			2. Potential fair market demand if feasible	7	
			3. Attractive downland	7	
			4. Existing structures to be removed, large investment in infrastructure needed	6	
			5. Reasonable site access and good accessibility to M3 J11	7	
			6. Could have neutral effect on in / out commuting	6	
			7. Could potentially contribute to evolving sub-regional growth strategy	6	
			8. Provide boost to growth of local knowledge based activities	7	
			9. In sequential terms the site is identified as a rural area	6	
			10. Boost economic image of Winchester	7	

					<p>Constraints:</p> <ul style="list-style-type: none"> • Potential to impact the historic setting of the city of Winchester • Potential to impact views from the South Downs National Park. • Development in the local gap; boundary and function of the Compton Street Local Gap. <p>Conclusion:</p> <p>Subject to addressing impacts of development, especially on the historic setting and SDNP, the part of the site previously developed is available and suitable for an appropriate form of development. This is recognised in the WDLP Part 1 (policy WT3).</p>
66					
Barton Farm (SQW site 40)	<ul style="list-style-type: none"> • Northern edge of Winchester, adjacent to B3420 • Open farmland 	<ul style="list-style-type: none"> • Countryside • Reserve site for major mixed use development area comprising 	<ol style="list-style-type: none"> 1. Rolling open farmland 2. Potentially promising market demand 	<p>7</p> <p>7</p>	<p>Positives:</p> <ul style="list-style-type: none"> • Identified as major developed site, therefore principle of appropriateness for development

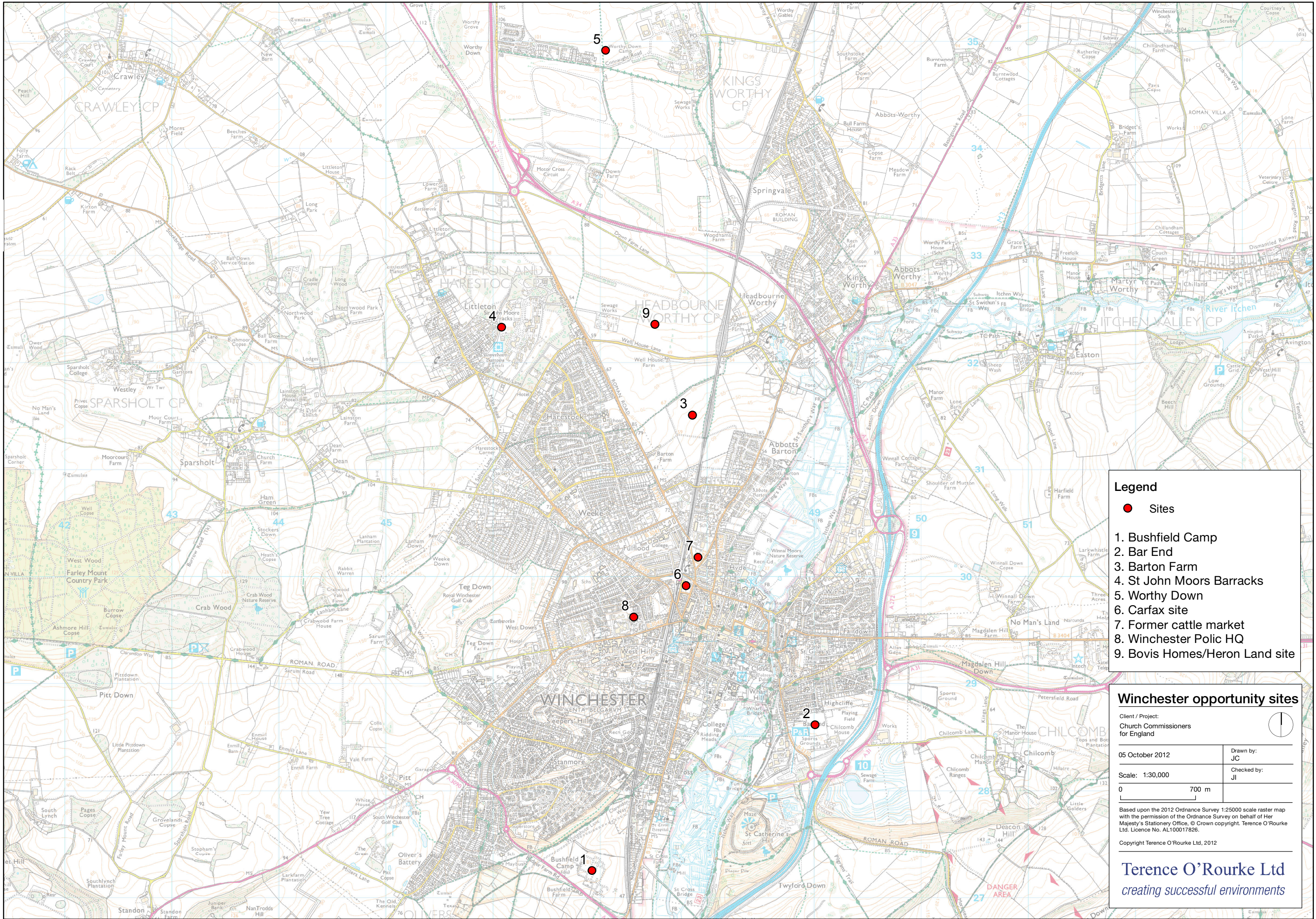
		<p>approximately 2,000 dwellings</p> <ul style="list-style-type: none"> • Development only to be permitted if the LPA is satisfied there is a compelling case for providing additional housing 	<p>3. Very attractive landscape</p> <p>4. No apparent development constraints but major infrastructure required</p> <p>5. Potentially good site access but distant from the motorway</p> <p>6. Could reduce net-out commuting if developed alongside housing</p> <p>7. Potential contribution to evolving employment sub-regional growth strategy</p> <p>8. Boost to local knowledge based activities</p> <p>9. In sequential terms is edge of settlement</p> <p>10. Boost to local economic image compatible with conditioned urban extension</p>	<p>8</p> <p>7</p> <p>6</p> <p>7</p> <p>6</p> <p>7</p> <p>7</p> <p>8</p>	<p>already accepted</p> <ul style="list-style-type: none"> • Directly adjacent to settlement boundary • Close proximity to Winchester railway station (0.8 miles) <p>Constraints:</p> <ul style="list-style-type: none"> • Southern part of the site forms part of a dry valley, which is sometimes subject to flooding • Potential noise issues associated with proximity to railway line, which bounds the site's eastern edge • Distant from the strategic road network • Site now benefits from permission for mixed-use development, including 2000 homes and Park & Ride facility. <p>Conclusion:</p> <p>The principle of development is now established with granting of planning permission for a strategic mixed-use</p>
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					development. The approved scheme does not include scope for a major employment development therefore is not suitable for further consideration as an opportunity site.
70					
Little Royal Training Barracks SQW site 41 (Sir John Moore Barracks)	<ul style="list-style-type: none"> • North Winchester • Operational MOD complex fronting main road in attractive landscape setting 	<ul style="list-style-type: none"> • Countryside • Central and southern parts of the site form part of Winchester – Littleton Local Gap • Development in this area that would physically or visually diminish Local Gap will not be permitted 	<ol style="list-style-type: none"> 1. Slightly sloping extensive site 2. Potentially fair market demand 3. Attractive site 4. No apparent development constraints but would need to be cleared 5. Good access but poor location related to motorway 6. Neutral effect on in / out commuting 7. Potential contribution to evolving sub-regional economic growth strategy 8. Boost to knowledge based economy in Winchester 	<p>8</p> <p>7</p> <p>8</p> <p>7</p> <p>6</p> <p>6</p> <p>6</p> <p>7</p>	<p>Positives:</p> <ul style="list-style-type: none"> • Partly previously developed • Relatively good local road access (Andover Road) <p>Constraints:</p> <ul style="list-style-type: none"> • Forms important local gap separating settlements of Winchester and Littleton • Poor links to strategic road network • Currently occupied by operational MOD complex – no indication of the site becoming available for redevelopment. • Remote from Winchester city

			9. In sequential terms is edge of settlement	7	Conclusions: Not a viable option for an opportunity site, given the remoteness from Winchester city, and no indication that the site is or likely to become, available for redevelopment.
			10. Boost to economic image of Winchester	7	
69					
Former HMS Dryad SQW site 42.	<ul style="list-style-type: none"> • Extensive MOD complex • Landscaped grounds with high security • May become available for development 	<ul style="list-style-type: none"> • Countryside 	<ol style="list-style-type: none"> 1. Extensive undulating landscape 2. Uncertain demand for science park in this off-centre location 3. Very attractive environment 4. No apparent development constraints 5. Site access indirect, some way from M27 6. Wide area labour catchment 7. Potential major contribution to area growth policy 8. Major contribution to promoting knowledge based activities 9. Sequentially the site represents 	<p>8</p> <p>6</p> <p>8</p> <p>8</p> <p>6</p> <p>5</p> <p>7</p> <p>7</p> <p>4</p>	<p>Positives:</p> <ul style="list-style-type: none"> • Previously developed site <p>Constraints:</p> <ul style="list-style-type: none"> • Not within Winchester Town spatial area • Relatively remote, off-centre, rural location • Poor links to strategic road network • No indication that the site is available for redevelopment <p>Conclusion: Not part of the Winchester Town spatial area, so not an option for an opportunity site to</p>

Former HMS Dryad SQW site	<ul style="list-style-type: none"> • Extensive MOD complex • Landscaped grounds with 	<ul style="list-style-type: none"> • Countryside 	<ol style="list-style-type: none"> 1. Extensive undulating landscape 2. Uncertain demand for science park in this off-centre location 	<p style="text-align: center;">8</p> <p style="text-align: center;">6</p>	<p>Positives:</p> <ul style="list-style-type: none"> • Previously developed site <p>Constraints:</p>
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Appendix B



- Legend**
- Sites
1. Bushfield Camp
 2. Bar End
 3. Barton Farm
 4. St John Moors Barracks
 5. Worthy Down
 6. Carfax site
 7. Former cattle market
 8. Winchester Polic HQ
 9. Bovis Homes/Heron Land site

Winchester opportunity sites

Client / Project:
Church Commissioners
for England

05 October 2012	Drawn by: JC
Scale: 1:30,000	Checked by: JI

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Terence O'Rourke Ltd
creating successful environments

Appendix 3

**THE ACADEMY
OF URBANISM**

THE ACADEMY OF URBANISM
Place Partnering visit to Winchester

22 – 23 September 2011



Image Tom Lonsdale

1. Background

- 1.1. The Academy's Place Partnering programme offers places selected as finalists in the Academy's Great Places awards the expertise and experience of Academicians to help them tackle obstacles to longer term and broader success. It is offered as a diagnostic service, to help, encourage and challenge the diverse interests that influence the success of places to recognise and tackle the issues and opportunities that are of greatest importance. (A copy of the prospectus for participating places is at *Appendix 1*.)
- 1.2. The visit to Winchester was at the invitation of the City Council. In early conversations with the Academy, City Council representatives recognised the potential value to the *Town Forum*, the body that brings together the various interests and influences on the success of Winchester town. The Town Forum is in the process of reviewing its vision and strategy, and the benefit of an external perspective was immediately apparent. The visit was arranged to fit the review process and this report will inform the later stages and, we hope, the future of the Forum.
- 1.3. The visit was on 22 and 23 September 2011. The Academy Panel comprised a chairman, a rapporteur, and three panel members. They met a total of twelve representatives from the Council and local organisations. The people involved are listed in *Appendix Two*. In the interests of open discussion both during and subsequent to the visit, opinions and positions are not directly attributed, and we have tried to reflect the tone and intention of what was said by all.
- 1.4. The conversations we had were friendly and helpful, in a manner we came to realise is characteristic of Winchester (of which, more later). They were also rigorous and challenging. Panel members, through a total of 12 hours intensive questioning of Winchester representatives gained a sufficient understanding of circumstances to offer a reasoned assessment of the relationship between the various perspectives and objectives, and their chances of a successful outcome. The initial conclusions of the Panel were well received by Council representatives at the end of our visit, and we trust this report will be similarly received by all parties engaged with the Town Forum. The Academy wants to ensure that its involvement is helpful, and will present its diagnosis to the Forum, if invited, at the appropriate time.

2. Local context

- 2.1. Winchester town is defined as the six wards that make up the built up area of the historic city of Winchester, plus the two contiguous parishes of Badger Farm and Oliver's Battery. This is to distinguish it from Winchester City, which defines the much larger administrative area of the District Council. The Winchester Town Forum was established in 2002. It is comprised of WCC Ward Councillors, with representatives of other bodies invited to participate.
- 2.2. Its *Vision* was first published in 2006. Since then, the City Council has undertaken the *Blueprint* initiative, carried out to strengthen public engagement in long term planning for the future of the whole District. The insights of this exercise informed the representations that the Panel received, and helped focus attention on the issues facing Winchester town in particular. Winchester town centre now also has a Business Improvement District (BID). This is nearing the end of its first five years, during which it has achieved significant improvements for town centre businesses and users. It will be seeking continued support from those businesses in 2012. The City of Winchester Trust (CWT) is a well-established

Civic Society which was established to resist, initially unsuccessfully, the insensitive and unnecessary demolition of an historic area of the town, but with considerable success has continued to protect the character of Winchester for over 50 years, without objecting to innovative change which it sees as an essential part of the city's evolving character. Winchester Action on Climate Change (WinACC) was established in 200[7?] by residents wanting to address and reduce Winchester District's carbon footprint, identified as one of the highest in Britain. Their action plan promotes changes to travel and lifestyle in and around Winchester town, as well as across the District.

3. Diagnosis

3.1. We present our analysis and assessment under the headings of the Town Forum's current vision, to help it fit the review process. The diagnosis offered is agreed by all members of the Panel; there was no dissent on any of the issues we address in this report. The Panel also considered matters of process – the way the Forum operates and addresses the issues that fall within its remit.

3.2. Heritage

3.2.1. This is given the highest priority by the *Vision* and was a recurrent theme in all the Panel's conversations during the visit. The panel heard continual references to the attractiveness and importance of Winchester's historic buildings, the importance of its setting and the remarkable juxtaposition of the town and the surrounding countryside. These have been well researched by Wintonians and external experts. They are well understood and widely valued. We heard concerns that new development, particularly large scale development, could threaten these characteristics and that the planning system could not guarantee new development of a standard high enough to enhance its setting. The Panel shared concerns about the limitations of the planning process, but felt that concentrating primarily on the appreciation of Winchester's heritage and setting is becoming a constraint. The heightened local awareness and appreciation of Winchester's built and natural heritage reinforces strongly-held opinions that result in some residents objecting to just about everything. One panellist suggested that this awareness was acting as a cage – preserving something of value and interest to be admired, but constraining natural growth and development. The heritage that is admired and valued is the consequence of change over millennia, and another panellist detected an attitude in the town that "people were willing to accept change, as long as nothing was different". The quality and consequences of development may be unpredictable, but that cannot be a justification for avoiding it. Local and future needs have to be met, or the attributes of Winchester will fossilise. The vision and actions of the Town Forum should help to strengthen and supplement the Council's planning powers, to secure the best possible development. Winchester is in a strong position to do this. The Panellists were impressed not only with the historic character of the town, but also the generally higher than average quality of new development. By embracing the principle of change, local interests could have greater influence over it – setting standards rather than responding to what developers propose. The Panel suggested that greater use of design codes, review panels, planning briefs and other forms of active engagement in the design process could help to overcome local apprehensiveness over the quality of new development.

- 3.2.2. The Panel heard frequent reference to the setting of Winchester, and we were given summaries of the LDA study (1998) which concluded that “the historic, aesthetic, visual and nature conservation qualities of Winchester and its setting are exceptional”. This setting was described to the Panel as a bowl, with a sharp distinction between the edge of the built up area and the countryside, and green wedges penetrating close to the centre of the town. While the Panel acknowledged the attractiveness of the setting of Winchester, we felt that the setting was more intellectual concept than actuality. The visibility of the countryside from the town, and the views of the town from specific viewpoints are rightly valued as important elements of Winchester’s character and should be protected. The ‘bowl’ is, however, significantly modified by ridges and valleys within and beyond it. The urban area already ‘spills over’ the bowl into the surrounding area, and the green wedges are actually the remnants of countryside enclosed by the outward expansion of past phases of urban development. In most approaches to Winchester the town cannot be seen, either because of the topography, or because of the dense cover of mature trees on streets and private land. It was this sylvan setting that the Panel found most distinctive about Winchester, and most important to protect. Many of the trees are mature and approaching senility. Ensuring the density of tree cover remains will not only protect the historic character, but also help to assimilate new development. Badger Farm is a good example of how the impact of a major new urban extension can be absorbed over time by a well-designed and densely planted landscape.
- 3.2.3. The Panel heard concerns about the cumulative effect of continued expansion on the character of Winchester and its relationship with the surrounding countryside. Panellists were asked at what point we felt such expansion would result in a fundamental change in character. The Panel drew a distinction between the distance of the edge of the town from the centre, and the nature of the edge itself. The former raises issues of access, and of the distribution of activities and services within the boundary. These are matters that Winchester, along with many other historic places, has managed over centuries, and we will address the implications under later headings. The latter is a matter of urban design and development management.
- 3.2.4. The Council as local planning authority has the power to control the location and form of development in a way that protects the ‘edginess’ of Winchester’s periphery. As one panellist pointed out; an onion, while growing successive rings, always look like an onion.
- 3.2.5. We will address the housing issues associated with Barton Farm later, but examine it here, in the context of setting, as many to whom we spoke referred to the intense local interest this aspect of the delayed decision on the Cala Homes appeal. The Panel visited the Barton Farm area. The site sits beyond the bowl in which the town centre sits, and there is no intervisibility. The site of the proposed development seems to be visible only from the surrounding roads, and the railway. It is understandable that such a large scale development should be controversial, particularly as here has been nothing similar for thirty years, but the panel felt that its impact on the setting of Winchester would not be significant. Panellists noted that the approach along the Andover Road has at present long-established development on the west side, as it passes the Sir John Moore Barracks, Harestock and Weeke. While some of the ‘green wedge’ would be lost, there seemed to the panel to be no reason why development could not be assimilated relatively easily into its setting, by maintaining the tree screens that dominate approaches to the town.

3.2.6. Panellists were taken by a reported comment from one of the leading opponents to the development of Barton Farm who said something to the effect that they would not object to the development if it were assured to be of a quality that “he would be proud to take his guests across the road and explain that this is such an exemplar that people come from a far away as Scandinavia to admire it”. The Panel feels that that is a laudable and reasonable expectation. If the decision is taken by the Secretary of State to approve the development, all parties involved in the Forum should work with the developer to achieve that outcome. If the appeal is dismissed, the town will still have to face the inevitability of growth. If it is not located at Barton Farm, similar capacity and eventually more, will have to be found somewhere.

3.3. Business

3.3.1. Local representatives emphasised the importance and significance of the scale of public sector employment to the economy of Winchester. The historic importance of Winchester as the County Town of Hampshire, and the public administrative and service activities concentrated here as a result will be an important component of its future success. Some reported local opinion suggested that the inward commuting that these activities generated was unsustainable in terms of energy use and environmental quality.

3.3.2. The Panel feels that in this context a wider perspective of sustainability is required. The County town role of Winchester is important to the wider area, to Hampshire and to the region as a whole. The prosperity that the concentration of public activities generates affects a wide area, and diluting this in the interests of short term environmental benefits could have long term unsustainable consequences. The Panel was told that public sector employment in the town could reduce in the near future by 1500 jobs as a result of current and predicted spending cuts. We feel that further destabilisation by relocating services would serve no-one's interests.

3.3.3. There remains however a significant imbalance between public and private sector employment, and this anticipated contraction of the public sector could have a significant effect on the local economy, at least in the short term. The Panel applauded steps to diversify employment, and stimulate new business activity. The BID has been energetic and successful in promoting the town centre, and the consequent recorded increase in footfall, if replicated in local business turnover, is extraordinary. The Panel applauds the efforts of the BID team, and hopes that it secures the votes necessary from local businesses to secure a second five year term.

3.3.4. There is a strong desire to attract new high-added value businesses to the town, and although most places have similar aspirations, the Panel agrees that Winchester has more potential than most to exploit the skills already present, and the quality of its environment. Winchester is constrained in attracting new, young start-up businesses by the cost of housing. We will return to this issue later, but the provision of cheap, flexible business space is already proving successful, and there is obviously demand for more. It was also suggested to the Panel that businesses being established at the other end of the career cycle, by established and experienced mature people interested in establishing their own businesses were better able to meet the high costs of a Winchester base. The Panel thought this was an interesting insight, and worthy of further exploration with local business organisations and academic institutions.

- 3.3.5. The Panel feels that the Town Forum's perspective on business development is unduly constrained by its declared boundary [eg it does not include the impact of IBM]. The Panel were made aware of the total number of people commuting into and out of Winchester daily, but the number that travel from the contiguous and local settlements – in particular Kings Worthy – would give a more useful understanding of “local” employees, and households who depend on Winchester town for employment and services. There are also significant employers located in the surrounding area. Not only do these provide employment for Winchester residents, but they may also be important contributors to future economic growth. There is no mention in the vision, for example, of IBM. Its Hursley campus is only three miles [check] from Winchester town centre, and must be by far the largest private sector employer of Winchester residents. While its location may not be the most sustainable, IBM's potential to stimulate further activity in high-value added business ought to be exploited, and embraced by the Forum.
- 3.3.6. Just as Barton Farm is generating concerns about the setting of Winchester to the north of the setting, so aspirations to develop Bushfield Camp by its owners the Church Commissioners is generating concerns about Winchester's southern border. Having viewed the area from Badger Farm to the east and Badger Farm Road to the south, panellists feel that concerns regarding its impact may be overstated. While this east facing downland is an important component of Winchester's setting (especially seen from the National Park), the previously developed area of the former military camp though only lightly screened has scope for further planting. With this it should be possible to accommodate the ‘knowledge park’ proposed by the land owners, if carefully designed, on this area without compromising views. Panellists noted that economic development policies related almost exclusively to diversification through incremental growth of small businesses. Winchester at present has no basis on which to respond to an approach from a new major employer to locate locally. If Rolls Royce had decided to move to Winchester rather than Chichester, or Vodaphone to Winchester instead of Newbury, what would Winchester have done? Planning is not good at accommodating unexpected opportunities, but the Town Forum could identify possibilities without allocating them in statutory plans. The Panel did not have time to visit Morn Hill, but understands that development here was the consequence of a response to such an opportunity.
- 3.3.7. Perhaps more importantly, the Forum should know how it would respond to the unexpected declaration by a major employer to move out of Winchester. Local representatives referred to the discussions over many years about the future of the Police headquarters. The importance of major employers to the status and economy of Winchester as County town are recognised by some, but active encouragement of, and engagement with public and private sector employers could strengthen the long term sustainability of the town. The negative aspects of accommodating large scale employment in a small historic city can be mitigated by planning and transport measures, such as park and ride, of which, more later.
- 3.3.8. We discussed the role of Winchester as a conference town, and the constraints of hotel accommodation on strengthening this aspect of the economy. The size and status of the University of Winchester is an important contribution to the town's attractiveness and capacity, but the Panel feels that the economic potential of the conference market, without major investment in facilities, is likely to be limited. Additional hotel space will help to maximise use of current facilities as well as strengthen the town's tourism offer.

3.3.9. In discussion of the ratio of inward to outward commuting, local representatives referred to the potential development of the 'Carfax' site opposite the railway station entrance. Panellist agree that this could be a good location for new office accommodation for businesses employing people that currently commute out of Winchester, notably to London. This site is owned by the County and City Councils, and there are sites in the vicinity owned by others, notably the surface car parks serving the station, that may offer further development potential. We heard concern that there may be pressure to accommodate residential development on this site in order to maximise its development value, but the Panel feels that designation for commercial development should give the local planning authority sufficient control to ensure the most appropriate use. This would also be a suitable location for a hotel. A planning brief for the site, and possibly a wider area should ensure that the scale of development is sympathetic to the local context and views across the town.

3.4. Retail and leisure

3.4.1. Just as housing and heritage discussions are dominated at present by Barton Farm, so discussion of retail activity in Winchester is dominated by the long-standing proposals for Silver Hill. The Panel did not explore the plans in detail, but having walked the town centre, sees the logic of accommodating retail growth in a purpose-built extension to the retail core. The low level of vacancies, and the competition for units that do become available shows strong retail performance. The quality of the town centre as a place to visit and shop in, and the opportunity to combine shopping with other service and leisure activities helps Winchester to compete with larger centres in the sub-region.

3.4.2. While the High Street may be predictably dominated by familiar national names, the Panel found the peripheral streets to have a healthy mix of independent retailers, restaurants, pubs and other attractions. BID surveys show that footfall has increased by nearly 40% since it was established, which if accurate, is a remarkable success. The historic buildings of the core do well to accommodate modern trading, and infill development is generally well-designed and sympathetic. It may be more difficult to achieve this at Silver Hill, with the scale of development apparently necessary to make it viable, but it will take pressure off the High Street, and enable the town to hold on to and attract the national retailers that shoppers expect, and provide the footfall on which the independent retailers depend.

3.4.3. The Panel heard concerns that further growth of Winchester would put unsustainable pressure on the town centre as it struggles to meet the needs of a growing population. The Panel feels that such fears may be overstated. There is scope for the town centre to grow, for access to be improved and controlled, and for local centres to expand (as Weeke is doing) to meet local needs. Many historic towns in Britain are facing similar challenges, and there are examples of how this can be done. [eg Norwich, Cambridge and Exeter]

3.4.4. We heard of recent expansion of the market into the High Street and its successful trading despite concerns expressed by some High Street retailers. The market was in full swing during the Panel's visit. The High Street is a distinctive, attractive and popular space. The market increases the retail offer and is likely to be particularly attractive to visitors. It does however take up a lot of space in the relatively narrow pedestrianised area. This makes some areas congested and obscures many shop fronts, particularly with the style of stall used. The Panel feels that the Broadway (as intended) would be a more appropriate location for the market. Although this will be

compromised by bus routes until the Silver Hill development is introduced, steps could be taken to rationalise public car parking and taxi ranks to allow space for at least some stalls. Panellists applaud the ambition to make major improvements to the Broadway once the bus station is relocated.

3.4.5. The capacity of the town centre may be increased by developing the surface car parks following rationalisation of access (which we turn to later). Panellists feel these could be used for a variety of uses, including hotel accommodation, to encourage visitors to stay and spend more in the town.

3.5. Housing

3.5.1. Future housing provision is the issue that seems to attract the greatest attention locally. As we have already discussed, the proposals for Barton Farm have raised the debate to fever pitch, and current changes to national development policies and planning processes are complicating the picture. The Secretary of State's decision is imminent, and if it is to grant consent, as we have said, the Forum should work with all interested parties to secure the best possible development. If it is refused, the issue will not disappear. At some time in the future, the demand for housing will become irresistible and this site, accepted generally as the best available for large scale development, will come forward again. The Panel feels strongly that the Forum should acknowledge and tackle the inevitability of growth, and concentrate on ensuring that when and where it happens, it is carried out to the highest quality and in the best interests of the present, and most importantly the future, residents of Winchester.

3.5.2. The demographic projections set out in the Council's *Blueprint* make clear the consequences of restricting development to accommodate local changes only. An ageing population will become increasingly dependent on a shrinking economically active cohort that cannot afford to live in Winchester. Local representatives explained that this issue had been recognised and accepted relatively easily in the District's smaller towns and larger villages, where these consequences were already apparent, but denied so far in Winchester town, possibly because these issues are not yet at crisis point in the larger population. One panellist suggested that the issue might be brought into sharper focus by extrapolating the demographic generation for a further 20 or 30 years to emphasise and illustrate the unsustainable consequences of not allowing growth. Another suggested that the issues might be illustrated further by using the fictional characters of the *Blueprint* document, which have apparently been so useful in helping people to focus on the current issues. Projecting their circumstance in the future, under different scenarios could help people grasp the long term consequences of short term avoidance of change. In reality, change of some form will happen, even if the town adopts a 'do-nothing' policy, as its demographic profile evolves.

3.5.3. Accommodating new housing through urban intensification is well-established in Winchester. Panellists heard that some interests in Winchester object to the loss of larger houses and gardens while others see this as a sustainable alternative to urban extension. The Panel agrees with those who see the future of Winchester as requiring both, and encourages the Forum to promote standards and scrutiny that will ensure the best development in all circumstances. The Panel were generally impressed with the standard of infill and estate development in Winchester. Panellists suggested that visits by interested parties to successful projects elsewhere [eg. Hammarby, Stockholm; Accordia Cambridge; Bruges and Ghent; Delft; Edinburgh; Lincoln] in Britain and Europe could identify better solutions and broaden awareness of Winchester's

achievements so far. The possibility of media criticism of such 'extravagance' could be avoided by inviting the press representatives to participate, and perhaps to use twinning links as a starting point. The Academy of Urbanism has strong links with communities in Europe, and could help to broker and facilitate reciprocal visits.

3.5.4. Panellists share the local exasperation over the provision of 'affordable' housing. It is difficult to achieve significant provision through the development of small 'windfall sites' which are usually, and sometimes deliberately, below the threshold for such provision. If approved, the Barton Farm develop will provide 40% affordable homes, but with residential values as high as they are in Winchester, the Panel accepts that the likelihood of these making a significant contribution to local needs is small. This is not, in the view of the panel a reason for not proceeding. The population projections show that Winchester will need more economically active people in the future, and for this reason alone, major new housing development will be necessary, if the medium term stability and prosperity of the town is to be secured. A number of local representatives referred to the failure of social housing policy and finance, and the value locally of retained council housing. The Panel agrees that the future of affordable housing, locally and nationally, requires a radical overhaul of housing provision, the regulation of the housing market, and the way social housing is financed. These will not be resolved by local action, so in the meantime the Forum partners should do what they can to ameliorate a deteriorating situation. One way might be to identify sites suitable for 100% affordable houses for adoption, not as 'exception sites', but as a local planning policy allocation. Sites already in public ownership would be an obvious place to start. The promotion of Localism by the Government, and the desire by many agencies, public and private, to tackle the affordable housing issue provides a fertile context for innovation.

3.6. Transport

3.6.1. It was reported to the Panel that traffic congestion and access to the town centre are a major local issue, used by some to resist further growth. The Panel takes the view that access for cars is causing congestion, and that by restricting such access, significantly greater town centre capacity could be released for pedestrians and new development. The park and ride facilities reduce if not remove the need for commuting workers to drive into town. The reduction of cars parking in the town allows the amount of parking to be reduced, reducing the incentive for cars to drive into and around the centre. (Some congestion is likely to be caused by drivers searching for parking spaces.) Converting long stay parking spaces on the edge of the town centre to short stay, allows the short stay spaces around Friarsgate and North Walls to be closed and redeveloped. This will no doubt cause short term consternation, but experience in places like Durham and Bury St Edmunds suggest that the advantages will soon become apparent. The historic town centre is easily walkable for able-bodied people, and facilities for those less mobile can be maintained. Removing traffic will improve walkability, extending the range and increasing the attractiveness of pedestrian routes.

3.6.2. WINACC has prepared a persuasive overlay of the supposedly car-friendly Bluewater Park shopping centre in Kent on the centre of Winchester. This shows that the distance from the more peripheral car parks is no greater than from car parks used by Bluewater customers. Greater footfall between these car parks and Winchester town centre would increase the commercial potential along these routes. Removing cars seeking parking from town centre streets would allow them to be restricted to service and public transport vehicles only, closing them to through traffic. This would reduce pollution,

improve safety and environmental conditions, and encourage investment in areas like St Georges Street. It may help to prioritise access to all spaces in the town centre, in descending order: pedestrians, service vehicles, buses, cyclists, cars gaining access, and general traffic.

- 3.6.3. Reduced traffic flows would allow more streets to be pedestrianised or given pedestrian priority, and the one way system to be abandoned, allowing service vehicles to take shorter routes and public transport to serve better the most popular origins and destinations.
- 3.6.4. Public transport is apparently not well-used. It is expensive to operate and expensive to use by those who do not have a bus pass. Panellists questioned whether in the long term it would be better to provide public transport free at the point of use for all, recovering costs by other means. This would significantly increase use, reduce car use, encourage leisure activity and diversify the evening economy of the town centre. Such services could be linked to the park and ride buses which already provide a free service and could be used more intensively in off-peak periods for short central trips. These would be quicker as a result of reduced congestion and two-way streets.
- 3.6.5. The Panel understands the complex relationships between local and highway authority, and the income derived from public car parking. These should not constrain those engaged with the Forum in pursuing the benefits of radical changes.

3.7. Culture

- 3.7.1. The historic city of Winchester with its Cathedral, Crown Courts, Royal and military origins, Winchester College, Bishop's Palace, hospital, university and art school has cultural foundations of which the diverse components of the local community are justifiably proud. They have attracted an educated populace with high expectations and a willingness to promote cultural activities and events. Panellists were also made aware of the fragmentation into different communities of interest, and the possible reluctance to join forces and co-operate. Winchester increasingly promotes its festivals, but this could be more effective if they were better co-ordinated and mutually promoting, and linked to other town centre improvement strategies, as for example, in Birmingham and Lincoln. The Panel felt there was a risk that events~organisers and the town as a whole interpret the enthusiasm of those involved as widespread popular support. This can breed complacency, and the reputation of the town and particular events can be devalued if they are not constantly refreshed and promoted to new markets. The Forum could provide the medium through which stronger mutual recognition, co-ordination and promotion could be encouraged.
- 3.7.2. The Panel observed that the expansion of the Discovery Centre on Jewry Street appears to be a real asset to the town, while the River Park leisure centre is still in need of improvement.
- 3.7.3. The town has a small theatre, but no music venue for smaller orchestra or rock music tours. It has no gallery for touring exhibitions. The opportunity to develop town centre sites may provide a suitable location in the future, and the Forum could encourage private and public sector institutions, especially the universities, to support additional cultural facilities appropriate to a growing town. There are many and diverse models that may inform future ambitions for Winchester: the Pallant House Gallery, Chichester; the Turner Gallery, Margate; the New Art Gallery, Walsall; the Barbara Hepworth

Gallery, Wakefield; Salts Mill, Saltaire; Lakeside Arts Centre, Nottingham; the Albany Empire, Deptford. Local representatives referred to the need for start-up facilities for artists, artisans and small creative businesses. The Panel agreed that these would assist not only cultural development and diversity in the town, but also increase its general attractiveness to investors.

3.8. Environment

3.8.1. The environmental benefits of traffic and transport changes are obvious, and the concentration of the population in a high density, high quality environment will help to reduce the carbon footprint of Winchester by reducing the need and desire to travel. As we have said in the context of the heritage of the historic city, fears of doing damage to the environment should not result in paralysis. We heard of frequent comparisons, from local people and visiting admirers, of Winchester with the walled hill towns of northern Italy. While this may be flattering to some, it is a simplistic and unhelpful comparison. We can learn much from other places, but Winchester is not a hill town, it has not had a town wall for many centuries, and it is not surrounded by vineyards. It plays an important role in the economy and society of Hampshire and the South East of England, and has to strengthen its relationship with its hinterland. It is not in a position to pull up its drawbridge however attractive that might sometimes seem. The Forum has a role in promoting a realistic role for Winchester which takes a wide and long term approach to sustainability to balance short term focus on energy saving and waste reduction.

3.9. Community

3.9.1. This element of the Forum's visions was not challenged during the Panel's visit, possibly because it focuses on the activities of the voluntary sector in Winchester, which was perhaps under-represented among the people we met. The main aspect of community activity addressed in our conversations that is not summarised above is education. The role of the state and private schools in the town seems well-established and uncontroversial. The importance of the Sixth Form College, Peter Symonds, was made clear to us, as was the increasing profile of the University of Winchester. We presume there is some forum for discussion and co-ordination among education providers outside the Town Forum, but the latter could be an important medium for connecting education, business, culture and environmental interests and ensuring that education at all levels is providing future generations of Wintonians with the skills and understanding to strengthen the sustainable success of the town.

3.9.2. The Panel felt that more could be made of the character assessment that has been carried out for the town, using it to promote greater awareness of local distinctiveness among the resident communities of the different areas, as has been achieved in Lincoln to good effect. As well as informing appropriate approaches to change, it can engender civic pride in individuals, and greater self-esteem for local communities.

4. The future of the Forum

4.1. We have referred already to the fragmentation of interests in Winchester. This seems to be a historic feature of a historic city which has been dominated for centuries by Royal patronage, the Church, the Law, the Military and public administration. The Forum should be just that -

an opportunity for the aspirations and expectations of the diverse interests of the town to be aired, in public, and conflicts recognised and resolved.~The Panel detected a remarkable degree of consensus among the representatives we spoke to, given the diversity of interests and priorities. We think this is a false consensus that focuses on the minor matters that are common ground and avoids the big issues on which there remains dissent and conflict. As the voting members of the Forum are all City Councillors, this consensus tends to be managed to minimise the potential for political point-scoring on a closely balanced council. The Forum and the City Council are excellent at caretaking by consensus, but appear constrained from exploring realistic policies for the future.

- 4.2. The Forum could either change its constitution or establish a subsidiary body within which dissent could be aired and argued over without forcing City Council members to adopt a particular position (at least at the outset). This could help reduce the intense scrutiny of matters that are of little importance by people with the time and inclination to endlessly debate pet issues, when they could be helping the town recognise its role in stimulating economic activity regionally and nationally at a time when other parts of the Country are at a disadvantage. We were told that the possibility of a Town Council to represent the six unparished wards of the town had been debated in the past and that the Forum was widely accepted as a sensible alternative. It was suggested at least once that the City of Winchester Trust acts *in loco parentis* for an elected parish/town council as far as planning matters are concerned. While this may be local shorthand, there is an important distinction between a lively and dedicated Civic Society, and a democratically elected third tier of local government. This should be acknowledged.
- 4.3. The social and economic challenges for some members of the Winchester community are acknowledged and addressed, but the combination of a well-educated and articulate community, living in a town blessed with few significant problems, tends to result in lengthy argument over minutiae~that is possibly stifling the creativity and progress that has shaped the heritage of Winchester over centuries. This is reflected in the lack of impetus behind the Local Strategic Partnership, and perhaps the Forum itself.
- 4.4. The Panel is certain that the Forum, in its future role, has to be the place for arguing and resolving where the future shape and nature of Winchester as a growing place, rather than a place for agreeing its finer qualities and the means of protecting them. The Panel heard that resistance to change arises from fear - of mediocrity in future development, of the loss of the familiar, and of the devaluing of the historic city's heritage.
- 4.5. The Forum has to damp down these fears and encourage local groups and individuals to tackle the real challenges of affordable housing, an ageing population, and an imbalanced economy. A confident community, valuing the past but focussing on the future, should be able to avoid mediocrity by asserting what it wants and expects from new development . With well-articulated policies and standards, what will be new development tomorrow can in time become the familiar and valued heritage of generations to come.
- 4.6. As part of our Place Partnering programme, the Academy will be establishing and facilitating a mutual support network among those places that participate. We hope that this will strengthen local capability, capacity and confidence, and we look forward to maintaining contact with the Winchester Town Forum through this medium.

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Appendix 4

Part B – Please use a separate sheet for each representation

Name or Organisation : The Church Commissioners for England (2201)

3. To which part of the Local Plan Part 1 does this representation relate? Please state which

Paragraph number	Policy number	WT3 Bushfield Camp Opportunity Site	Key Diagram/ Proposals Map

4. Do you consider the Core Strategy is :

	Yes	<input checked="" type="checkbox"/>	No
4.(1) Legally compliant			
4.(2) Sound			<input checked="" type="checkbox"/>

*If you have entered **No** to 4.(2), please continue to Q5. In all other circumstances, please go to Q6.*

5. Do you consider the Local Plan Part 1 is **unsound** because it is not:

- (1) Justified
- (2) Effective
- (3) Consistent with national policy

6. Please give details of why you consider the Local Plan Part 1 is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Part 1, please also use this box to set out your comments.

Please refer to the attached representation, which sets out how the Church Commissioners for England suggest that policy WT3 should be amended to ensure that it is fully justified and the plan sound in respect of this policy.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the Local Plan Part 1 legally compliant

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Rep number:

or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to the attached representation, which sets out how the Church Commissioners for England suggest that policy WT3 should be amended to ensure that it is fully justified and the plan sound in respect of this policy.

(Continue on a separate sheet /expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the invitation of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a change, do you consider it necessary to attend and give evidence at the hearing part of the examination? *(tick as appropriate)*

No, I wish to communicate through written representations

Yes, I wish to speak to the Inspector at the hearing sessions

9. If you wish to participate at the hearing part of the examination, please outline why you consider this to be necessary:

The Church Commissioners for England are landowners of the site identified in policy WT3 (Bushfield Camp). They are therefore a key delivery partner and stakeholder. The Church Commissioners support the inclusion of the opportunity at Bushfield Camp, as is set out in their representations, but have identified some proposed changes that will better explain why the policy is justified. They wish to reserve the right, therefore, to participate in the hearing and ensure that the plan is sound in this respect.

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Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing part of the examination.

10. Do you wish to be notified of any of the following? Please mark all that apply. We will contact you using the details you have given above unless you specify an alternative address.

(1) when the Local Plan Part 1 has been submitted for independent examination

(2) when the Inspector's Report is published

(3) when the Local Plan Part 1 is adopted

Data Protection Act 1998 and Freedom of Information Act 2000

Representations cannot be treated in confidence. Regulation 30 of the Town and Country Planning (Local Development) (England) Regulation 2004, as amended, requires copies of all representations to be made publically available. The Council will also provide names and associated representations on its website but will not publish personal information such as telephone numbers, emails or private addresses. By submitting a representation on the Pre-Submission Local Plan Part 1 you confirm that you agree to this and accept responsibility for your comments.

Signature:

Ann Bartaby

Date:

9 March 2012

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Date received:

Consultee ID:

Rep number:

Proposed changes to policy WT3: Bushfield Camp Opportunity Site

The Church Commissioners for England strongly support inclusion of Bushfield Camp in the Core Strategy as an ‘opportunity site’ and recognition at paragraph 3.34, that the Council is committed to continuing to work positively with the landowner.

There are, however, a number of minor changes to the detail and wording of the policy, which the Church Commissioners identify would help to ensure that the policy (and the plan) is sound.

Justification test

While the Church Commissioners strongly support the identification of land at Bushfield Camp as an opportunity area in the plan, they are concerned that the policy as drafted does not fully explain why the policy is justified.

As drafted, policy WT3 does not fully reflect the strategic importance of the site. At paragraph 3.39, it is stated that the site is not a strategic allocation as the policy does not specify a particular use, but that its aim is to “ensure the delivery of wider outcomes”.

A key element of the ‘wider outcomes’ that development of the former camp area would deliver, is the provision of a significant area of public open space (approximately 23 hectares). As well as making a significant improvement to the informal recreation provision in Winchester, this would effectively safeguard the majority of the land in perpetuity, and is therefore of strategic importance to the future pattern of growth in Winchester.

As is recognised at paragraph 3.38, a positive planning solution for the site is most likely to be achieved by including the site within the strategy for Winchester Town rather than staying silent and risking “unplanned or piecemeal planning outcomes”. The supporting text (paragraph 3.34), recognises that the site has been subject to many development proposals in the past, which have attracted significant community interest and concern for a comprehensive solution for the site. It should be noted that without a clear planning policy position regarding the site, speculative development proposals are likely to continue to come forward. This is especially the case as the Core Strategy recognises the needs to look beyond the established boundaries of Winchester to meet all the varied development needs of the community over the plan period.

The recent report by the Academy of Urbanism (September 2011) for the Town Forum, recognised that Winchester currently has no basis on which to respond to an approach from a major employer to locate locally, or indeed, to one of the existing major employers wanting to expand locally. Policy WT3 provides the Core Strategy with a potential land resource that could accommodate such unexpected opportunities. Maintaining the status quo will perpetuate the city’s weakness for attracting new investment, as identified in the Academy’s report, with consequential risks to the continued buoyancy of the local economy. No other opportunity sites have been

The Church Commissioners for England (2201)

identified in or around Winchester, so it is entirely justified that the unique opportunity at Bushfield Camp is recognised in the plan.

Consistency with national policy

In respect of policy WT3, the Core Strategy is responding effectively to key aspects of Government policy, although the supporting text does not reflect this.

The Government's Plan for Growth (March 2011) states at paragraph 2.9:

“The Government is committed to ensuring that the planning system does everything it can to support growth. This statement of Government policy is capable of becoming a material consideration in local planning decisions with immediate effect and local authorities should press ahead and put in place development plans that are pro-growth.”

The draft National Policy Planning Framework (NPPF) places a strong emphasis on planning positively for sustainable growth, and for example, identifies an urgent need to restructure the economy to meet the twin challenges of global competition and a low carbon future. In the spatial strategy for Winchester Town, the Core Strategy refers to the Vision for Winchester and one of its key objectives to “encourage people to do business here”. As the Academy of Urbanism report identified, Winchester currently is not in a strong position to accommodate major inward investment, therefore it needs opportunity areas if it is to capture growth in the future.

By including the opportunity area policy for Bushfield Camp in the Core Strategy - recognising the limited opportunities within the established boundaries - the Council will be positively planning for sustainable development. This is in line with these key Government objectives, ensuring that the plan has flexibility and capacity to accommodate growth.

Proposed changes to the plan

As stated above, the Church Commissioners support the identification of land at Bushfield Camp as an opportunity site under policy WT3. To ensure that the policy is sound, minor changes and additions to the wording of the policy and its supporting text would help to fully explain why the policy is of strategic importance to the future of Winchester, thereby fully justifying its inclusion in the Core Strategy.

The proposed changes are as follows, with additions in bold and underlined:

Paragraph 3.34

The future of the site, which is in **single** private ownership, has been the subject of uncertainty, detailed discussion and various planning proposals over many years. **Interest in the site is expected to continue, particularly with the need to look beyond the established boundaries to meet the development needs for the whole community.** Previous site assessments have concluded that “the scope for any form of built development is limited”, however, the Council is committed to working positively with the landowner to identify a sustainable solution for the site, given its sensitive location **and the benefits of removing the derelict structures.**

Paragraph 3.38

A positive planning solution is needed for the site, which contributes to the spatial development strategy for Winchester Town and the importance of its setting. It must also ensure that the important characteristics of the site are retained, including realising the recreational potential ~~of the area~~ **on the edge of the City, which amounts to around 23 hectares of land**, and prevent an unplanned or piecemeal planning outcome. The characteristics of the site may suit a form of development that requires such a unique location, possibly business or institutional uses, rather than traditional housing or other uses which could and should be accommodated within or adjoining the town.

Paragraph 3.39

The site is not a strategic allocation because the aim of this policy is to enable possible future uses for the site to be explored which also ensure the delivery of wider ~~outcomes~~ **spatial planning objectives**. Its development should help realise the Vision for Winchester and the Community Strategy's aims for the wider District, and must be compatible with the policy framework set out in this Core Strategy.

Paragraph 3.40

Consequently Bushfield Camp is identified as an 'Opportunity Site'. This status recognises the **strategic** opportunity for the site to contribute towards social, economic and environmental aspirations for Winchester and for a form of development which ensures that the key aspects of the site are retained in perpetuity. **Inclusion of this opportunity site in the Plan will help to deliver sustainable growth opportunities that may not otherwise be possible.**

Policy WT3 Opportunity Site – Bushfield Camp, Winchester

First bullet

- limits the total area of development to 20 hectares of land, prioritising use of the previously occupied area **but allowing for appropriate strategic landscaping.**

Final paragraph

Only schemes which incorporate an innovative and progressive approach **to satisfying these criteria and other relevant policies and spatial planning objectives of the Plan**, resulting from assessing the needs of the town and community views **aspirations**, and satisfy the above criteria and other relevant policies of this ~~Plan~~ will be favourably considered.

Rosemary Morton
Programme Officer Local Plan Part 1
Winchester City Council
c/o Strategic Planning
City Offices
Colebrook Street
Winchester
Hampshire
SO23 9LJ

Sent by email: rmorton@winchester.gov.uk

30 July 2012

Dear Ms Morton,

Winchester District Local Plan Part 1 - submission

Thank you for the opportunity to add to comments submitted on behalf of the Church Commissioners for England at the pre-submission stage (reference 2201).

Proposed Modifications

We welcome the proposed modifications to the text of policy WT3: Bushfield Camp Opportunity Site (**modification 47**), namely the reference to allowing space for strategic landscaping, and need for mitigating (as well as minimising) the impacts on the strategic highway network. Also, the minor clarification of the site's ability to exploit the proximity to the South Winchester Park and Ride is supported. There is a clear opportunity, we consider, for development of the site to exploit and help sustain, the bus services from the park and ride to the city centre.

Modification 48 is also generally supported, although we would wish to reserve the right to query the detail of this text at the examination. This modification helps to clarify the justification of the opportunity site policy.

A new reference is made to the policy being related to currently unidentified needs. This is considered to be an appropriate reference but must be seen in the context of

Planning
Design
Environment

the evidence, including the Employment Land and Retail Study (Background Paper 4, June 2012). This paper makes reference to the Review of Employment Prospects Report (DTZ, August 2011). In section 4, this points to the evidence base demonstrating that there is a real need to broaden and diversify the Winchester Town economy to ensure that it does not remain overly reliant on the public sector. This is clear evidence of the need to provide the infrastructure to facilitate this, namely the provision of appropriate sites for employment purposes.

We consider that paragraph 4.11 of Background Paper 4 summarises the position accurately:

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. Policy WT3 therefore identifies land at Bushfield Camp as an 'opportunity site', which is 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.

The opportunity site will enable the local plan to respond to future need should a knowledge park scheme, or other employment generating scheme, become desirable for the sustainability of the local economy during the plan period. Its allocation will give a clear signal to the market of the existence of a highly attractive site. The wider benefits that a knowledge park development could have for the local economy are recognised in the adopted Winchester Economic Strategy 2010-2015.

In our pre-submission representations, we referred to the Academy of Urbanism report (September 2011) for the City Council, which recognized that a significant weakness for Winchester was the lack of space for the arrival of a new major employer, or relocation of an existing employer needing room to expand locally. Such needs are not always evident at the adoption of a local plan, but can quickly emerge through the plan period, particularly when the wider economic climate is in a state of transition. Without deliverable opportunity sites, the local economy is at risk of missing out on opportunities to capture new investment, particularly in an increasingly competitive regional economic context.

In relation to proposed **modification 35**, which includes adding an acknowledgement that there is a shortfall of recreation land in Winchester Town, we would wish to re-emphasise the ability of the opportunity at Bushfield Camp to provide a significant area of land for public open space as a part of the release of part of the site for development. We support the modification, in this respect, and consider it further justifies the inclusion of policy WT3 in the Winchester Town strategy, which requires land to be laid out for public use. This would make a significant strategic contribution to the city's green infrastructure.

We do not support **modification 37** at this stage. This suggests that an area around Winchester station "lends itself" to redevelopment, with its mix of commercial, retail,

residential and office space. While this may be an obvious area to seek redevelopment opportunity, with its high accessibility, it is not stated where there is evidence to support this assertion, for example land ownership. Therefore, the plan is potentially unsound if it assumes there is redevelopment potential without evidence of availability and deliverability, and a clear strategy for development opportunities within the city.

National Planning Policy Framework (NPPF)

Building a strong, competitive economy

Published since the pre-submission consultation, the NPPF is clear that a key priority of the Government is to build on the country's inherent strengths in meeting the twin challenges of global competition and a low carbon future. Following clear statements in the Budget, the NPPF confirms that the planning system is seen as central to enabling and delivering sustainable economic growth and local authorities are challenged to plan proactively to support business needs and support a modern economy (paragraph 20).

Policy WT3 is a proactive response to the local economic challenges facing Winchester, notably the cuts in the public sector, which emerged strongly in the consultation exercises and evidence base. The opportunity site is part of a vision for the town to build on its strengths, including in the knowledge and creative industries (policy WT1).

Local authorities are encouraged to identify strategic sites for local and inward investment "to meet *anticipated needs*" over the plan period (paragraph 21; our emphasis). Policy WT3 conforms with this approach, and especially in the absence of other available land assets to meet such needs, land at Bushfield Camp, part of which is previously developed, is a suitable site to be identified.

While there may not be an identified, quantified need for the opportunity site at this time (as stated in proposed modification 48), the NPPF is clear that policies should be flexible enough to accommodate needs not anticipated and to allow for rapid response to changes in economic circumstances. Policy WT3 gives the Local Plan this flexibility.

Promoting sustainable transport

The NPPF encourages plans to locate development that is likely to generate significant movement, in locations where the need to travel will be minimised. As it recognized in policy WT3, land at Bushfield Camp is well related to the South Winchester park and ride to exploit the bus connections to the city centre. The policy also has wider emphasis on accessibility and there are likely to be opportunities in this location, on

the southern side of the city, to improve pedestrian and cycle access and connectivity from the surrounding neighborhoods to the city centre.

The opportunity site also gives potential for Winchester Town to address the city's commuting issues, for example by providing more high-value employment opportunities for the city's skilled population (paragraph 3.16).

Conserving and enhancing the natural and historic environment

Protection of the natural and historic environment is another key objective of the NPPF. Policy WT3 recognizes that land at Bushfield Camp can only be developed within strict criteria that will seek to ensure that the environmental and historic importance in this location is respected. As noted in the evidence base, the site has been subject to development proposals in the past, and there is a lot of public interest in its future. The opportunity site policy is a proactive response to the importance of this location within the setting of the historic city.

Without this criteria-based policy, which covers to some 43 hectares on the edge of Winchester (Map 5), should development pressures grow over the plan period, the site would be more vulnerable to further speculative proposals. With this opportunity policy within the strategy for Winchester Town, the local authority has appropriate control over the site's future and is better placed to secure the wider benefits (social, economic and environmental) that can be delivered alongside development of the former camp area.

Ensuring the vitality of town centres

Inclusion of policy WT3 in the strategy for Winchester Town also conforms with the NPPF's key objective of protecting the health and vitality of town centres.

Paragraph 3.38 of the Local Plan Part 1 indicates that the site is not suited to uses that could and should be accommodated within or adjoining the town centre. With this opportunity policy the local authority can manage the site's future and ensure that any development proposals that come forward are only supported where they complement the overall strategy for Winchester Town. The main focus for development in Winchester Town is within the established development boundaries, but policy WT3 gives flexibility to capture growth that would not be appropriate or possible within the constraints of the existing urban fabric.

We thank you again for this opportunity to add to our representations and trust that these comments will be given due consideration at the examination.

Yours sincerely,

pp

A handwritten signature in black ink, appearing to be 'Ann Bartaby', written in a cursive style.

Ann Bartaby
Director

cc John Weir, Church Commissioners for England