



Winchester District Local Plan Part 2 Development Management and Site Allocations

Draft Stage Representations

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5th December 2014

Winchester Town Policies

1. Section 3.3 Housing

a. Winchester Town's net Housing requirement

The Trust is in full support of the proposal that no new green field allocation is needed to satisfy the requirement of 4000 houses in Winchester Town up to 2031 and that the number of houses needed to achieve this total can be built on sites within the defined town boundary.

But the Trust notes that some Winchester City councillors have called for sites to be found for affordable housing on greenfield sites because recently some development sites within the town boundary have been granted permission without having to provide any affordable housing on the grounds of viability, contrary to policy CP4 in LPP1. The Trust's view is that WCC should challenge robustly developers' claims of non viability which should be achieved by reducing land values to take into account the requirement to provide affordable housing in the proportion proposed in policy CP3 in LPP1 and in line with paragraph 3.3.4 that all housing sites above the threshold will need to provide 40% affordable housing.

b. Housing densities and design

There are two further policies that the Trust believes should be included in LPP2 that can help to deliver housing, including affordable housing. Essentially they are about developing at higher densities which is in accordance with policy CP14 in LPP1, making effective use of land. This can be achieved more easily on larger sites than on small ones.

b. Barton Farm

The Barton Farm development is a large site and could deliver higher densities and therefore more housing than the figure of 2000 houses which was fixed in the early 1990s before the advent of PPG3, the first policy document to encourage a higher density policy. The Trust was disappointed to see the first two phases which have so far obtained detailed planning permission were granted at the very low densities of no more than 20 dwellings to the hectare. If the design approach set by these phases is continued for the rest of the development it will deliver a car dominated 20th century suburb like other existing Winchester suburbs. Whereas we should be planning for a 21st century high density suburb by designing and building more terraced housing centred on squares and generous green spaces, designed in a way that encourages more bicycling and walking for shorter journeys and discourages the level of car use which became common in 20th century. Such an approach will contribute to reducing congestion and pollution. **The Trust therefore believes that LPP2 should include a policy that requires a review of the Master Plan to examine the potential for achieving more housing by adopting the approach outlined above.**

c. Infilling

In other existing low density developments in Winchester it is less easy to achieve higher densities but not impossible. Some infilling has occurred where houses have generous gardens and this has sometimes created uncomfortable and inappropriate house design. **This could be reduced if a policy is introduced in LPP2 which discourages individual infilling and back garden development but instead encourages land assembly from neighbouring plots to create an area sufficiently large where a square or courtyard development would be an appropriate and attractive design solution and achieve more housing at a higher density.** Such a policy was advocated by the Trust in the document it published in 2001, 'The Future of Winchester a Strategic Vision' and believes it would make a useful contribution to delivering more well designed housing within the town's boundary.

2 Paragraph no. 3.7.2 and Policy WIN 1 (i) – Special character and setting of Winchester

The Trust supports this policy but the terms 'special character' and 'setting', require more definition so they are in a form that a planning application can be assessed to see if it accords with this policy.

The Trust advocated the designation of a Green Belt around the north, west and south of the City in representations on LPP1, to complement the South Downs National Park to the east, This would provide an appropriate measure to support this policy. The importance the Government attaches to Green Belts is confirmed in the National Planning Policy Framework (2012) in paragraph 80.

The proposal by the Trust for a Green Belt designation was rejected by the Inspector for the Inquiry on LPP1, in his report (February 2013). He said that 'It would therefore partly prejudge complex decisions about the long term future of Winchester, that the Council is not in a position to realistically make at the present time'. He also felt that there were adequate policies to protect Winchester up to 2031.

Following the adoption of LPP2 for the plan period 2011-31, the Trust believes it would be a suitable time to start the process of exploring an option for a green belt and proposes a course of action to be taken by WCC, to support Policy WIN 1(i)

In October 2014, English Heritage published a report, 'The sustainable growth of Cathedral cities and Historic towns'. It stated that Green Belts have been one of the most successful planning policies and are widely appreciated by the public if not developers (para. 4.38)

A Green Belt around Durham was established in principle in 1999 and in detail in 2004. For Durham, the report stated, the Green Belt policy between 2004-14 has been successful, notably in protecting Durham's heritage, in encouraging urban regeneration and in promoting development in the mining villages. Much of what is said about Durham is relevant to Winchester. It said that 'outside the city there are challenges that development should not damage the setting of the town or cause sprawling out from the compact form over the surrounding hills'.

Winchester's setting and compact nature has been recognised in a number of studies and documents over the years including:

Winchester City and its Setting 1998 (WCC)

Winchester District Landscape Character Assessment 2004 (HCC)

Winchester and its Setting 2011 (CWT and Hampshire Gardens Trust)

There has to be a limit to the growth of the City if its character and setting are not to be fundamentally altered and a green belt would be an appropriate way of ensuring that is prevented. The Trust therefore proposes that these documents would be a useful starting point in preparing a consultation document for the creation of a green belt and the following policy is proposed:

A consultation exercise is prepared and undertaken for the designation of a Green Belt around Winchester in conjunction with or following the adoption of the South Downs National Park Local Plan in 2017.

3 Policies WIN 1(iii) and 2(iii) Transport and Access – car parking walking and cycling

The Trust welcomes the encouragement of sustainable transport options etc in paragraph (iii) of Policy WIN 1 but does not believe the wording in paragraph (iii) in Policy WIN 2 ('effectively mitigates adverse environmental or transport impacts within Winchester town centre.') will deliver this.

As stated in its 2001 Strategic Vision document, The Trust will support policies that aim to eliminate through traffic from the centre of Winchester, reduce non essential traffic from the City core and provide parking on the edge of the City Centre. The Winchester Town Access Plan has similar aims and LPP1 supports these and includes the objective of reducing parking by some 500 spaces from the City Centre. The Trust therefore supports these aims and objectives and is concerned to note that they are contradicted to a significant extent by the WCC Parking Strategy requiring the retention of present levels of car parking in the town centre. **The Trust would therefore like to see a precise policy to deliver the aims of WTAP such as the reduction of 500 spaces in the town centre mentioned in LPP1 in place of policy WIN 2 (iii).**

4 Silver Hill Policy WIN 4(iv) Parking etc

This is a city centre development and so, in line with its Strategic Vision document, the Trust believes it should be seeking to reduce the amount of parking rather than replacing the capacity of the Friarsgate car park. At the moment only 133 spaces are available for use in Friarsgate so this should be considered as the upper limit for the amount of public parking that is provided for the future

The Transport Assessment mentions the provision of a car club. For residential parking, a car club should be a requirement for the residents of the housing proposed for the development, if they wish to have access to a car. If this is provided, it would mean significantly fewer car spaces being required for residents' transport needs.

Although the Trust does not object to the loss of the bus station, it firmly believes that all the facilities needed by passengers should be provided to a high standard in the right place for all users of buses serving the centre of Winchester.

5 Walking and Cycling

The Trust is aware that there is an adopted cycling strategy and a walking strategy for Winchester has been agreed by WCC's cabinet. Both of these support the aims of WTAP and the Trust is disappointed to note LPP2 is silent about both of them and would like to **see specific policies in LPP2 for implementing both strategies in Winchester Town as the opportunities arise when funding becomes available and development takes place.**

6 Employment. References to Bushfield Camp Paragraphs 3.2.2 and 3.4.1

The Trust has objected and continues to object to Bushfield Camp being identified in LPP1 as an employment site of around 20 hectares because of its impact on Winchester's setting. If it is implemented it will not be in accordance with policy WIN 1(i).

The development proposals for the Station Approach Area have come forward since LPP1 was adopted (see Policies WIN 5, 6 and 7). To avoid premature development of Bushfield Camp, The Trust proposes that policy wording should be included that: **' no development at Bushfield Camp for employment use should be permitted before allocations of employment land set out in policies WIN 5, WIN 6 and WIN 7 have been permitted, implemented and occupied.'**

7 Retail Paragraphs 3.5.1- 3.5.5

The Trust has seen a copy of a letter from Harvey Cole dated 24 November sent the Chairman of the Planning Committee at WCC suggesting that the amount of retail floor space proposed at Silver Hill in the current planning application will result in an overprovision of floorspace, in expenditure terms. of £33.4 million, compared with the figure given by WCC' s consultants , Nathaniel Litchfield and Partners, who calculated the overprovision as £20.2 million. If Harvey Cole is right, although this does not mean that any policy needs to be changed in the Local Plan, it will be relevant in considering the amount of retail space to be provided in Winchester Town as a whole and will be relevant to retail provision in the wider district during the plan period. Therefore Trust believes the findings of Harvey Cole should be investigated by WCC..

8 Paragraphs 3.2.6 and 3.6.8 Infrastructure

a Public utilities

Para.3.2.6, states that there is concern about the strain additional development would place on existing infrastucture.

No mention is made of the capacity of supplies of water, gas, electricity, sewage treatment and surface water drainage to accommodate the future growth that is being proposed in the plan. Continual renewal and repair is evidence of the existing strain being imposed on this aspect of infrastructure. **LPP2 includes Development Management in its title and should include a statement about the existing capacity of these utilities, and their ability to be managed to provide for the needs of future growth.**

b Land for education

Reference is made in para.3.6.8 to the provision of a new primary school at Barton Farm and expansion of Henry Beaufort School.

Education is a major activity in Winchester. In 2013, 16.642 students were receiving tuition in primary, secondary, tertiary and further education schools, colleges and universities in the town. With 4000 new dwellings being proposed in the plan period, the population of Winchester will increase by about 10.000. To this has to be added the prospect of the continuing expansion of Winchester and Southampton (Art School) universities for teaching and accommodation space.

The recent provision of a new primary school at Westgate and the issues surrounding student accommodation both on and off campus, are indications that **there is a need for LPP2 to assess and identify provision for future educational requirements.**

9 Paragraph no. 3.7.5 Policy WIN 3 – Views & Roofscape

The Trust welcomes inclusion of this policy but believes it needs additional work.

The consideration for views should be widened beyond views to and from the Key Historic Features listed in para. 3.7.6, to include views of landscapes such as St Giles Hill and St Catherine's Hill. The heights of buildings in recent years has caused controversy as being out of character to the adjacent area, most recently in the proposal to build up to six stories in part of the Silver Hill development. **Therefore the Policy should include height as a factor which governs the size of a development.**

Roofscape is a product of building type (church, public building, commercial, residential), floor plan area, building height, materials and topography. Policy on this matter needs to be more explicit, if it is to be helpful and able to be implemented. The Trust acknowledges that a study to define and support a roofscape policy would be complex, but if undertaken it would make the policy more credible. The Winchester Conservation Area Project 2003 contains useful material on views,

roofscape, building heights and massing which could be useful source in helping strengthen the policy.

Station Approach Area

10 Policy WIN5(1)

Discussions have taken place within the Trust and with others about the proposals in the Winchester Station Approach Development Assessment 2014 (Station Assessment). There is considerable criticism about significant aspects of it and WCC has conducted no formal or informal consultation on the document. We are therefore very concerned to see that the Station Assessment is included as part of the policy for this area. It could lead to serious conflicts between what it proposes and other planning policies and aspirations for Winchester. **The Trust therefore believes the Station Assessment should not be included in the policy and that it would be better if its existence is referred to in the supporting paragraphs and include the intention to consult on it as with other planning documents.**

11 Transport and Access

WCC has two roles in this development, one as landowner, where it will legitimately wish to maximise the gain from the development potential of its land and the other as local planning authority when it must consider all the relevant planning policies and wider interests of Winchester, its inhabitants and others who work in and visit the town. The Trust believes that in some of the proposals of the Transport Assessment it appears that the development opportunities are given undue weight to the detriment of the wider Winchester interest and has not complied with the terms of the brief given to the consultants.

This is particularly noticeable with the public realm and transport and access aspects. The station is a major transport interchange area and the brief for the Transport Assessment recognised this by asking for 'a transport and parking strategy to maximise opportunities for walking and cycling, the use and interchange of public transport modes.....' and for 'proposals for improving links from the railway station to the City Centre'. The Station Assessment does not make adequate proposals for managing all the modes of transport in the area of the station square. With the finding by the Station Travel Plan of June 2014 that 45% of people taking a train walk to the station, not enough consideration is given to all the pedestrian routes into Winchester. One example is the route along station road towards the Westgate area which should be substantially improved, including widening.

All this could be clarified and resolved if and when public consultation takes place on the Station Assessment.

12 Policy WIN 5(viii) Parking

Paragraph (viii) refers to the retention of the current quantity of public parking spaces in the station area and to parking provision being consistent with the Council's Parking Strategy. As the station area is an important transport interchange, the managing of conflicts between all the transport modes is important and the location and quantity of parking provided will be relevant in influencing this. It is unclear whether the increase in capacity in the station car park on the East side of the station is being taken into account in assessing the quantity of parking needed and the Trust believes it should be.

The concentration of car parking on the Cattle market site would be a better location than on the Carfax site as it will reduce the need for vehicles approaching from Andover Road and Worthy Road to pass through the congested Albion traffic junction. It is also well located for accessing the town centre on foot.

13 Retention of buildings Paragraph 3.7.14 and Policies WIN6 and WIN7

Mention is made in WIN6(iii) of retaining and respecting the Records Office and the Station buildings but not the former Registry Office. In paragraph 3.7.14 it is stated that there is no requirement to retain the former Registry Office. **The Trust believes it is worthy of retention and its demolition needs to be justified.** It is a heritage asset, both in its own right and by reference to its relationship to the railway station and station square. The station itself could claim to be a candidate for statutory listing as its architect Sir William Tite designed other railway stations which are listed. The former Register Office is of the same period and was known originally as the Railway Refreshment Inn so it is not only part of the setting of the station but also has the railway as a common historical interest.

The other building which can claim to be a heritage asset and so merit being considered for retention, is Highfield Lodge, now the Conservative Club, at the northern end of the Cattlemarket site. Highfield Lodge was the home of G. H. Pointer, owner of Cheesehill Brewery who was involved in the 30 year battle to bring main drainage to Winchester. His speech in 1873 to the Scientific and Literary Association influenced the decision finally to do so. The 30-year battle between the muckabites and the anti-muckabites even drew coverage in The Lancet. The inelegant additions are easily removed, and the tarmac surrounding it would make any building look less than its best. The possibility for integrating it in a development scheme should be considered and so retain a bit of Winchester's history.

14 Extension of Winchester Conservation Area

Extending the boundaries of the Conservation Area is not mentioned in the Plan but in considering the Station Approach Area the Trust has become aware that the Conservation Area Project 2003 which recommends the extension of the Conservation Area in 4 places on page 90. One of these is the area between what is now Queen Elizabeth II Court and Winchester Railway Station which gives additional evidence on the importance of the Register Office. **The Trust recommends that WCC takes steps to implement these extensions and starts the process leading to this. An appropriate policy should be included in LPP2 if it helps to do so.**

Development Management

15 Open Space Provision for New Developments: Policy DM6

The background document Open Space Strategy, identifies specific needs and the deficits and surpluses of open space and informs the wording on DM6. It contains a lot of useful information but it omits a number of matters which are important for new developments:

- a. It does not identify areas in need of protection, the existing open spaces, the accessible surrounding countryside and important connecting paths.
- b. The provision of safe and attractive walking routes to existing open spaces and the creation of a network of paths with safe crossing points at junctions with roads.
- c. Where there is existing open space near to a new development consideration should be given to providing safe access to this for the residents and if it is in need of improvement the developer could be asked to finance this. In some cases this could be of greater value to the residents of the new and existing housing than providing small new bits of open space.

The Trust suggests the wording of policy DM6 should be amended to take these other aspects of open space provision into account in DM6. Some suggested additional wording is included in the policy indicated by underlining.

“Residential development of 15 dwellings and above should provide useable open space on site, in accordance with the Local Plan's space standard for quantity and quality; where there are private gardens the need for further on site provision may well not be required, especially if there is close proximity to existing public open spaces and paths leading into the countryside; what is important

is to ensure that there is safe and easy access for people of all ages and abilities to those spaces on foot. Similarly it is more important to ensure that nearby facilities are attractive, useable and in good condition before providing new on site. The exact form and type of open space should take into account the nature and size of the development and the specific needs, including quantitative and qualitative deficits of open space and recreational facilities, in the local area”.

Heritage Policies

16 Locally listed heritage assets. Policy DM31 and paragraph 6.4.98

The Trust welcomes this policy but is concerned to note that it is proposed to have SPD setting out the selection and review process to be followed. This could cause a significant delay to the start of the selection process. The Trust has made inquiries of some other local authorities and cannot find any one that has followed the route of requiring SPD for detailed guidance when there is a policy like DM31 in place. If further guidance is needed the Trust suggests that a quicker and satisfactory route would be for the cabinet to approve a paper setting out what is needed.

The Trust notes and approves the supporting paragraph 6.4.98 which states that “The absence of any particular heritage asset on the local heritage list should not be taken to imply that it has no heritage value, simply that it does not currently meet the selection criteria or that its importance has yet to be identified.” But to give it real force the Trust believes similar wording ought to be included in policy DM31 **to allow for an asset to be classified as locally significant by the local planning authority even if it does not appear on the local heritage list.** This will have increased and immediate importance if there is a significant delay in starting work on creating a list.