

Winchester District Local Plan Part 2 – Development Management and Site Allocations

Examination – July 2016

Winchester City Council

Response to Inspector's Questions:

Matter 14 **Winchester Town
Policies WIN1-4
Question i) and ii)**

Library Reference: WCC FS 14



Matter 14: Winchester Town - Policies WIN 1- 4

Inspector's Questions:

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

Introduction and background:

1. The introductory section to the Winchester Town part of LPP2 received a number of representations raising matters in relation to housing need/settlement boundary, employment land, open space, traffic and transport, and the Council has prepared a further statement Winchester Town General (Matter 14a), which covers these issues.
2. The report to the Council's Cabinet (Local Plan) Committee (WCC4) included a detailed summary of the alternative sites promoted for development that would fall within the Winchester Town area. That report concluded that given the scale of 'over-provision' expected from the sites already allocated or identified as part of the housing supply, additional sites would result in an even greater level of provision in conflict with the LPP1 housing requirement for Winchester (Policy WT1). Consequently there is no need or justification for extending the settlement boundary or for making additional housing allocations (see Matter 14a).
3. There is an extensive evidence base for the Town area covering a range of economic, social and environmental matters. In addition, the Council has initiated a number of development projects in relation to the Town. These are supported by technical reports and documentation and, where applicable, these have informed the preparation of this part of LPP2.
4. A representation comments that while there is reference to Winchester being internationally recognised, it is not designated as a World Heritage Site. However, this is not an issue for LPP2 as the Council is not in a position to make such a designation. Historic England (50084) specifically supports the introductory parts to this chapter, including the reference to 'internationally important heritage', as part of a positive strategy for the conservation and enhancement of the historic environment in accordance with the NPPF.
5. Whilst LPP2 includes some site specific development proposals for Winchester Town, it is anticipated that over the Plan period numerous proposals will be submitted to and considered by the Council. WIN1, WIN2 and WIN3 therefore, provide more general non-site specific policy guidance.

6. The following focuses on the issues raised in relation to Policies WIN1-4.

Policy WIN1 and WIN2

7. Policies WIN1 and WIN2 have been expressed to reflect the aspirations in the 'Vision for Winchester' (EBWT13), updated in 2012. The Vision for Winchester is prepared by Winchester Town Forum, the body of elected Members representing those Wards in the town which do not have Parish Councils, and sets out what it wishes to achieve over a five year period. That document identifies a number of objectives to be achieved, many of which fall outside the land use planning system, but others that have synergies with the consideration and implementation of development proposals.
8. There are various requests for these policies to be more prescriptive, but this is not considered necessary as LPP2 includes a number of development management policies that require the necessary detail at the planning application stage for those proposals that will come forward during the Plan period. To make the policies more rigid could potentially put them in direct conflict with advice in the NPPF which seeks a more balanced approach to decision making. These policies, and similar issues were raised at the Draft Plan stage, where these matters were considered by the Council at its Cabinet (Local Plan) Committee on 6 October (WCC4). The Council concluded that the policies reflect both the development strategy in LPP1, under Policy WT1, and the Vision for Winchester.
9. A number of representations request this part of LPP2 to be more specific in relation to mitigating transport impact, through reducing congestion and improving air quality. There are already a number of plans and strategies in place that cover these elements and which are reflected in LPP2 as necessary. It is not appropriate for these details to be repeated, particularly as these strategies and programmes are more likely to be updated in advance of a local plan review.
10. The Sustainability Appraisal (ref SUB4 Appendix VII) comments on the changes between Draft and Pre-Submission Plan and acknowledges that '*Some of the additional text may help to reduce the significance of negative effects - for example the now approved walking and cycling strategies can support sustainable transport modes and encourage a modal shift ...*'
11. These policies distinguish between those matters that apply to the whole of the Town area (WIN1) and those focused on the central commercial area (WIN2). A representation comments that neither WIN1 or WIN2 are shown on the Policies Map, this is an omission and the Council proposes to amend the map as necessary (Appendix C).

12. Given, the more general nature of these policies, a representation questions how these will be monitored. It is anticipated that various schemes and strategies coming forward in Winchester, will contribute to the delivery of both WIN1 and WIN2. The Monitoring Framework in Appendix D of LPP2 identifies how this will be recorded, with the key aims of the policy (target/direction) listed against the indicator which will be used to monitor that aspect of the policy, and where the information will be sourced from. See also the Council's Further Statement on Matter 16.

Policy WIN3

13. The background and justification for this policy is set out in document WCC4, reflecting the many and varied references to views into and out of Winchester which have been documented over the years. The approach expressed in WIN3 is supported by Historic England (50084), as part of a strategy for the conservation and enhancement of the historic environment in accordance with the NPPF. Whilst the recently adopted High Quality Places SPD (EBT24) includes general guidance on this matter, and therefore some suggest there is no need for WIN3, the Council considers it justified to include a policy of this nature for Winchester Town given its valued landscape and heritage setting.
14. Some representations request the reference to St Catherine's Hill (para 3.7.10 LPP2) should be deleted as this lies beyond the administrative boundary of Winchester District. However this is an important feature in the landscape with significant historical importance, and important views within the Local Plan area, to and from St Catherine's Hill, should be afforded a high degree of protection in line with other historic views in the town. Other comments consider the policy to be overly restrictive for the implementation of micro-generation equipment, but bullet (iv) as currently expressed allows for flexibility on this matter, and does not preclude the use of such technologies.

Policy WIN4

15. Given, announcements with regard to the Council's position in relation to Silver Hill, the Council prepared a Background Paper [Silver Hill, Winchester](#) (OD17), to set out the planning history and key considerations in relation to the site, which also suggested a way forward. Further, information is also on the Council's website [Silver Hill/Central Winchester Regeneration](#). A further representation (52024) makes specific comments in relation to OD17, and challenges the retail need for the development proposed on the site. This is covered in Matter 14a, which concludes that, despite delays with the site coming forward, there is a retail need established in LPP1 for Winchester which will be met over the Plan period, through both this site and those covered by Policies WIN2, WIN5-7 and WIN11.

16. The purpose of the Background Paper was to provide a summary of the complex history and circumstances of the Silver Hill site and it does not form part of the policy guidance in LPP2. Since publication of the Background Paper, the Council at its meeting of Cabinet on [29 March 2016](#) agreed to prepare a Supplementary Planning Document (SPD) for the area, an indicative timetable for the preparation of the SPD is set out at Appendix A. The Council's Cabinet will consider on 6 July 2016, ([CAB2821](#)) a report to agree the terms of reference for the Central Winchester Regeneration Informal Policy Group, who will be tasked with the preparation of the SPD. Whilst the work on this document will no doubt include updated evidence on retail needs, it is not for LPP2 to re-visit the 'objectively assessed needs' identified in LPP1.

17. The Council maintains that Policy WIN 4 therefore provides an appropriate framework for preparing the SPD, which will then contain more detail of how this key town centre site will be developed. The site also lies within the Conservation Area and has a number of known constraints. The process of preparing a SPD has to be inclusive to gain credibility and weight, and while this might delay the submission of a planning application, the development of Silver Hill is expected to be delivered within the Plan period.

18. Other representations in relation to Policy WIN4 refer to matters of detail and the need for clarification of the term 'comprehensive'. To clarify this element of the policy modifications are proposed (see Appendix B). A further representation requests that the uses listed in the first bullet are extended to include reference to '*community*', given the accessible, central location of this site. It may be possible for consideration to be given to some form of community provision through the SPD process, in developing proposals for the site and therefore it is proposed to make a minor amendment to WIN4 (i).

19. A number of representations refer to parking on the site, reflecting previous comments on transport matters in central Winchester. These are covered under Matter 14a, however, in relation to Policy WIN4, it is proposed to amend bullet (vii) to clarify this matter, as it will be necessary for more details on parking and transport impacts to be determined through the SPD process, including the results of the District Car Parking Strategy (EBT14) currently being updated, and it would not be appropriate for WIN4 to be more prescriptive at this time.

20. A representation from the Environment Agency (50083) confirms their support for the policy and reference to the requirement for a flood risk assessment given parts of the site may be at risk. Likewise Historic England (50084) has agreed an amendment to clarify the need for an archaeological assessment.

21. The Council, therefore, proposes to amend WIN4 to not only clarify its intentions but to ensure consistency with other policies in LPP2 and to

refer in the supporting text to the preparation of a Supplementary Planning Document. These modifications are appended to this statement (Appendix B). The Policies Map also needs to be clarified to illustrate the area covered by WIN4 in that part of WIN4 also lies within the prime shopping frontage (DM7), this is subject to a proposed Modification by the Council (see Appendix C).

Response to further written submissions

22. Whilst further submissions have been submitted for Matter 14, many of these cover matters such as land supply and settlement boundary, which are dealt with under Matter 14a Winchester Town General.
23. 50146 – comments that WIN1 does not have sufficient flexibility to allow for sustainable sites on the edge of settlements to come forward to contribute to the supply of housing and requests that Policy WIN 1 should be amended to refer to development within and adjoining Winchester Town rather than simply to the defined settlement boundary to allow proposals that are consistent with the identified principles to come forward, As currently drafted, it is in conflict with the spatial planning vision for Winchester in Policy WT1 of LPP1.
24. The Council maintains that the purpose of WIN1 is not to direct development to certain locations, but to establish a set of principles to be applied when preparing development schemes within the defined settlement boundary. Whilst Policy WT1 of LPP1 does refer to within and adjoining the defined built-up area, this reflects the location of the strategic allocation at Barton Farm, which remains outside the defined boundary, it will be necessary to adjust the boundary at the time when this development is completed, this is consistent with the approach taken by the Council, as detailed at para 19 of the [Settlement Boundary Review](#) (EBT5). This representation also comments Policies WIN 1 and WIN 2 do not refer to infrastructure requirements and are therefore not deliverable. Both WIN1 and 2 as set out in the supporting commentary provide principles to be taken into account when preparing detailed schemes, to deal with the many and varied applications that will come forward over the plan period in Winchester Town, as they are not site specific it is considered that they provide the necessary level of policy guidance.
25. 50153 – comments that the allocation of additional land outside the settlement boundary would comply with the requirements of WIN1 – see Matter 14a Winchester Town General.
26. 50162- reiterates matters in relation to the sustainability appraisal – see Matter 14a.
27. 51467; 51960; 52084 – reiterate requests to amend settlement boundary.

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28.51988 – reiterates issues already covered – see Matter 14a

29.52024 – see response in paras 15-21above

Conclusion

30. Policies WIN1-3 provide general policy guidance to ensure that development proposals in Winchester Town reflect those matters of importance to both the social and economic position of the Town, and to ensure that its highly valued environment retains its intrinsic features and characteristics, in accordance with Policy WT1 of LPP1 and NPPF paragraphs 150 – 154.

31. Policy WIN4 carries forward a previous 2006 Local Plan allocation, updated to establish a positive planning framework for a mixed use scheme on this important site, which lies within the defined town centre and the Conservation Area. The policy, therefore, is not prescriptive in terms of land uses and quantities, the existing evidence base supports the general references to social, economic and environmental issues and additional evidence undertaken to inform the preparation of the SPD will direct the final outcome for the site, which will be required to comply with policies in LPP1 and LPP2 and other guidance as necessary.

Appendix A Proposed timetable for the preparation of Central Winchester SPD

Cabinet Project Initiation	29 March 2016
Confirmation of project start post election (inc Town Forum) (Allow time for Local Plan Part 2 Examination and report)	June/July 2016
Call for submissions and discussion with interest groups and other community engagement	August – December 2016
Preparation of draft consultancy briefs for approval	January – March 2017
Confirmation of consultancy briefs and procurement	April/May 2017
Consultancy reports prepared	Summer 2017
Public engagement process following publication	September/December 2017
Preparation of and consultation on draft SPD	Feb - April 2018
Approval of draft SPD and consultation	June 2018

Appendix B Proposed Modifications to WIN4

Text to be ~~deleted~~/ text to be added

3.7.11 No change

3.7.12 The development of Silver Hill is expected to provide substantial improved retail floorspace which will contribute to meet the town's retail needs during the Plan period. up until at least 2024. ~~Planning consent has been granted for a mixed use development on the site, and the relevant Compulsory Purchase Orders confirmed~~ The site is controlled by various land owners and subject to a range of constraints as set out above. A Supplementary Planning Document should be prepared in the first instance to establish the quantities, types and disposition of land uses. Any subsequent planning applications for all or part of the site should demonstrate compliance with the Supplementary Planning Document once adopted and the following policy other relevant policies in the Development Plan:

Policy WIN4 –Silver Hill

Development proposals for a comprehensive mixed-use development within the area known as Silver Hill, as shown on the Policies Map, will be granted planning permission provided that detailed proposals accord with the Development Plan and demonstrate how proposals for all or parts of the site will accord with the following principles and achieve the form of development intended by this allocation as a whole:

- (i) provide an appropriate mix of uses that reinforce and complement the town centre, including retail, residential, community and other town centre uses;
- (ii) proposals should include a high quality ~~contemporary~~ design response;
- (iii) respect the historic context, and make a positive contribution towards protecting and enhancing the local character and special heritage of the area and important historic views, especially those from St Giles Hill;
- (iv) enhance the public realm;
- (v) improve pedestrian and cycle access;
- (vi) provide a high quality landscape framework ~~to create planting opportunities and ensure that where trees are lost an appropriate replacement planting scheme is agreed;~~
- (vii) include proposals which accommodate buses and coaches, and improve conditions ~~reduce traffic~~ in the Broadway, and remove traffic from Silver Hill (except for servicing). Appropriate car parking as required ~~to replace any spaces lost through development~~ should be provided and proposals should include any on or off-site mitigation measures identified through the Transport Assessment;
- (viii) include an ~~comprehensive~~ archaeological assessment to define the extent and significance of any archaeological remains and reflect these in the proposals, ~~provide for their preservation or recording,~~ as appropriate;
- (ix) include a Strategic Flood Risk Assessment, with suitable mitigation measures. ~~and an Environmental Impact Assessment which includes an assessment of other potential environmental impacts and any mitigation measures necessary.~~

Appendix C - Proposed amendments to Policies Map 26

