

Consultation comments on policy E2 – spatial distribution of economic growth

- Support - 9
- Neither support of object - 2
- Object - 5

The changes to the supporting text and the Local Plan policies have not only been informed by the responses to the Regulation 18 consultation but they have also taken on board any additional feedback that has come out of discussions/meetings with statutory consultees and members in order to improve the clarity and understanding of the contents of the Local Plan.

Comments that support policy E2 – spatial distribution of economic growth		
Respondent number	Comment	Officer comment
ANON-KSAR-NKFC-K	<p>Kennedy Wilson support Policy E2 in setting out a spatial distribution for economic growth and identifying locations where new employment opportunities will be encouraged. This is in accordance with paragraph 20 of the National Planning Policy Framework, which requires Local Plans to set out an overall strategy for the pattern and scale of development and make sufficient provision for employment and other commercial development.</p> <p>Specifically, Kennedy Wilson support the inclusion of the allocation for Solent Business Park (Policy SH4) for continued employment generating development with the South Hampshire Urban Area. The continued allocation of Solent Business Park will support the future delivery of high-quality commercial development, employment opportunities and economic growth which aligns with the Council’s objectives of growing a vibrant local economy.</p>	<p>Support for strategy welcomed and comments noted. Site specific comments regarding Solent Business Park (Policy SH4) will be considered under responses to that policy.</p> <p>Recommended response: No Change.</p>

<p>ANON-KSAR-N8MP-M</p>	<p>[This response should be read in conjunction with the full copies of the 'North Whiteley Representations to the Winchester Local Plan Regulation 18 representations OBO Crest Nicholson' representations submitted by email to: planningpolicy@winchester.gov.uk on 14/12/2022 from j.grist@nexusplanning.co.uk, which includes the relevant figures and appendices, with tables correctly formatted]</p> <p>Paragraph 81 of the Framework gives significant weight to the need to support economic growth whilst paragraph 86 emphasises the role town centres play at the heart of local communities. In this respect, the Council seeks to promote a vibrant economy for the District with Strategic Policy E1-E4 setting out the strategy for achieving this. Crest Nicholson is committed to helping the Council achieve its target of creating a vibrant economy through the development of the land at the North Whiteley MDA by locating development in a sustainable location where future occupiers will be situated in close proximity to existing services and facilities of the town to ensure the continued vitality and viability of Whiteley District Centre.</p>	<p>Support welcomed.</p> <p>Additional land has been allocated North Whiteley – see policy SH2.</p> <p>Recommended response: No Change</p>
<p>ANON-KSAR-N81Y-1</p>	<p>It is recognised that new employment opportunities will be encouraged throughout the district under draft Policy E2. Our client is supportive of this policy, specifically in its reference to Bushfield Camp accommodating approximately 20ha of new flexible employment land.</p>	<p>Support for strategy welcomed and comments noted. Comments regarding Bushfield Camp (W5) will be considered under responses to that policy.</p> <p>Recommended response: No Change.</p>

ANON-KSAR-N856-2	<p>Outside settlement boundaries economic development will be supported where it supports the diversification of rural economy and limited development consistent with the high quality environment, as specified in policies SP3, E9, E10 and E11.</p> <p>The proposed parish council plan to site 3G football pitches at Mill Lane, Wickham could be regarded as economic growth outside the settlement boundary. In order for this expensive facility to be viable it will need to attract many external clubs and supporters which would compromise the high quality rural environment around it as well as the historic approaches and centre of Wickham village for access.</p>	<p>Support for strategy welcomed.</p> <p>Comments regarding Wickham (Mill Lane) will be considered under responses to site allocation The Glebe (WK2) and other allocations in Wickham as relevant.</p> <p>Recommended response: No Change.</p>
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Comments which neither support or object to policy E2 – spatial distribution of economic growth		
Response ID	Comment	Officer response
ANON-KSAR-NKBD-G	<p>Bushfield has effectively rewilded over the last 40 or so years. It is home to a diversity of wildlife including glow worms, dormice, butterfly orchids, a range of butterfly species and many birds. It is important natural green space. If the camp is built on and the rest of the area managed sensitively as natural green space there may be some benefit but light and noise pollution will be an issue for the whole area. Bushfield is an important site for pollinators. It has been relatively undisturbed and could play a role in carbon sequestration and flood control.</p>	<p>Comments noted.</p> <p>Recommended response: No Change.</p>
BHLF-KSAR-N8Z7-8	<p>The SDNPA welcomes the proposed spatial distribution of economic growth as set out in Policy E2.</p>	<p>Support welcomed.</p> <p>Recommended response: No Change.</p>

South Downs National Park Authority		
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Comments which object to policy E2 – spatial distribution of economic growth		
Respondent number	Comment	Officer comment
ANON-KSAR-NKZ5-S	See E1 Needs to inc. Nature-based solutions and carbon emission net zero.	The comments submitted under E1 have been considered in the responses to that policy. Strategic Policy E2 sets out the spatial distribution of economic development and the additional comments provided here do not raise any particular issues in relation to this. The Local Plan is based within the context of the climate emergency and has a raft of policies aimed at reducing carbon emissions (the Carbon Neutrality Topic Policies CN1-CN7). Nature-based solutions are referred to in other parts of the Local Plan such as around nitrate neutrality (Policy NE16) and increasing biodiversity (Policy NE5). Recommended response: No Change
ANON-KSAR-NKYT-Q	See my comments re an 'holistic' approach in the previous section concerning a 'vibrant economy' and my comments which follow about site allocation & development in the sections that follow to adopt this principle.	The comments have been considered in response to E1 and do not raise any new issues here. Recommended Response: no change.

<p>ANON-KSAR-N85G-K</p>	<p>This is also an objection to W 5 Objection to the Bushfield development as it will lead to a further increase the large number of commuters from the S and East using B3335 and also on the following grounds;</p> <ul style="list-style-type: none"> o general sustainability o landscape impact o no need for more jobs in Winchester o better located in S Hants <p>The in combination effects must also be considered: eg to the impact of traffic arising from new housing along the B3335 and B2177 corridors on the upstream settlements. The further housing proposed for Colden Common (approx140 dwellings) and in Bishops Waltham will lead to additional traffic to B3335 which passing through the centre and historic core of Twyford. This will cause additional noise, pollution and congestion to the many residents living in the vicinity of the road and generally degrade the local environment and historic fabric. At present there is inadequate provision made for mitigating the harm caused by new development. Works required to mitigate this harm to Twyford should be a prior requirement of development along the B3335 and B2137 corridors, including the application of CIL. The requirement should be tied also to the upgrading of cycling facilities for commuters along the B3335 corridor at present held up primarily by the excessive speed limit (60 mph) on the Twyford to Hockley stretch of B3335.</p>	<p>These comments do not appear to relate to policy E2. Comments regarding Bushfield Camp (W5) will be considered under responses to that policy. National Park considered under Policy NE8. Spatial Strategy – comments regarding the distribution of growth are considered under Policy SP2</p> <p>Recommended response: No Change.</p>
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	<p>Note also the Statutory Duty imposed by the Environment Act 1995 para 62(1) (1)- (3). This requires WCC to have regard to the National Park purposes in any of its decisions that affect it. The duty is not limited to the National Park Authorities and is not limited to land only within the National Park. As this Duty must affect decisions made by WCC as Local Planning Authority it should be clearly restated in the Local Plan as a central consideration in its decision making. Policy SP 2 Spatial Strategy. the basis for deciding the distribution between the three components of the District is unclear. South Hampshire has been the main focus for growth and development yet in this plan the numbers in the rural settlements and the City far exceed those in South Hampshire.</p>	
ANON-KSAR-N85D-G	<p>In market towns and rural areas, such as Waltham Chase, maintenance of existing employment should override loss of such employment caused by new housing development. There is sufficient land available for house building without the need to replace small businesses which provide employment for local people and services to the local community.</p>	<p>Policy E6 considers the loss of employment use and land and seeks to retain employment where feasible.</p> <p>Recommendation: No Change.</p>
BHLF-KSAR-N8BD-W (CWT)	<p>Strategic Policy E2 - Spatial distribution of economic growth Objections and comments Bar End industrial estate should be included as a site where some employment should be retained/included.</p> <p><i>(Moved from E1):</i> Ambiguities in the text:</p>	<p>The Local Plan does not generally note the location of existing industrial estates. However, development management policy E6 sets out a presumption against any loss of employment land/use and seeks to retain existing employment sites where realistic, assessed against a range of criteria.</p> <p>Recommendation: No Change.</p>

	<p>Employment allocations</p> <p>The Trust is concerned about the apparent ambiguity over which are new employment allocations and which are sites where employment will/may be permitted. For example:</p> <ul style="list-style-type: none"> • Paragraphs 10.24 and 10.38 refer to more than one allocation but the Employment Land Review identifies a need for 20ha. of employment land which policy W5 implies will be entirely met at Bushfield Camp. • Paragraph 10.43: are CWR and Station Approach “employment allocations” or areas where additional employment floorspace will be provided? Ideally it would be helpful for the Local Plan to indicate, very broadly, how much additional employment floorspace is anticipated on these key sites as the Central Winchester Regeneration SPD (page 46) does in relation to residential, retail and mixed uses 	<p>E2 sets out which site allocations will be expected to provide employment floorspace, either wholly for employment, or as part of a mixed use development. Where possible and where appropriate as part of the strategy, broad amounts are specified within the site allocation policy.</p> <p>The 2020 ELR identified a need for approximately 20ha of employment land. The allocation at Bushfield Camp is one of a number of allocations that will provide additional employment land and these are described in Policy E2 and the text.</p> <p>It is appropriate to have a number of employment sites to provide a range of opportunities and in different locations across the local plan area in accordance with the spatial strategy. This allows for sites to be delivered at different times, provides flexibility regarding the uses and quantum on each particular site and provides a degree of buffer should some sites not be delivered.</p> <p>An updated Employment Land Study is currently being undertaken. This will provide a new estimate of employment land requirements for the plan period. This section of the Local Plan will be updated following the publication of this study.</p> <p>It is agreed that paragraph 10.42 should be amended to clarify that this is one of a number of sites being allocated.</p>
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		<p>Paragraph 10.43 does state that both CWR (W7) and Station Approach (W8) sites are mixed use allocations. Regeneration schemes. However it is accepted that both Policy E2 and the supporting text could be clearer on the nature of the allocations.</p> <p>Recommended Response:</p> <p>Amend E2 to be clearer about the nature of the site allocations which contain employment uses.</p> <p>Amend text to be clearer on the nature of the allocations, the quantum of land being planned for overall and as part of allocations and to generally update and improve the clarity of the text –</p> <p>Replace all of paragraphs 10.37 – 10.49 with new paragraphs as set out below.</p>
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	Recommendations	Officer response
Comments from SA/HRA	No recommendations provided	N/A

E2 - spatial distribution of economic growth

Amendments to supporting text

All text amended final version below.

SPATIAL DISTRIBUTION OF ECONOMIC GROWTH

10.34 Strategic Policy E2 sets out the allocations that will assist in meeting the identified need for additional employment land (office and industrial floorspace) across the plan area, along with indicating the different approaches that should be taken to new economic development. Developments that provide floorspace for other employment opportunities will be encouraged where they accord with the plan.

10.35 The site allocations referred to in this policy are those where employment use is specifically sought, or where it is likely to be provided as part of mixed-use developments. Some allocations are also listed below where employment is specified on a portion of a larger allocation – such as a part of major housing allocations.

Winchester Town.

10.36 Winchester town is the main economic centre in the district. As the County Town located on a main line station with access to the wider region and London, Winchester is also an important focus for administration and regional and local government. Economic development will generally be permitted within the settlement boundary of Winchester Town. Town Centre uses will be encouraged to locate within the Town Centre boundary shown on the Policies Map.

Bushfield Camp (Policy W5)

10.37 Up to 20 hectares of new development is proposed within the total site area of 43 hectares (ha). The site is allocated for high quality business employment and complementary uses. The Council has approved a Concept Masterplan which indicates that approximately 59% of the total development of 20 ha will be offices. Therefore, it is considered prudent to estimate that this site will deliver 11.8ha of those uses over the plan period.

Winnall (Policy W6)

10.38 The existing policy approach of allocating and protecting traditional employment uses within the Winnall area of the city is to be continued. The policy is aimed at retaining the core of the 43 hectares of the area in sub-area 1, for industrial (B2) and storage and distribution (B8) employment, with more flexibility in other parts of Winnall.

Mixed Use Allocations –

10.39 Several sites within Winchester Town are being allocated for regeneration. The sites will deliver a wide range of benefits to the city as a whole, including business and employment generating activities. The nature of development on these sites is being developed via a series of masterplans.

Central Winchester Regeneration (CWR) (Policy W7)

10.40 CWR includes 4.5 ha of land for a mixture of employment-generating uses to reinforce and complement the town centre, including retail, leisure other town centre uses and residential. The exact nature of the scheme is being developed through the planning process with the Council's Development Partner. In 2018 the Council adopted a SPD to guide the development of the area. That SPD estimated that between 2,700 sqm – 13,000 sqm of mixed uses including employment could be delivered on the site. Based upon this, it is estimated that the equivalent of 1 ha of the site could be delivered for office uses (just over half of the mixed-use area).

Station Approach Regeneration area (Policy W8).

10.41 The Station Approach area includes a number of land parcels comprising a total area of c 7ha. A number of potential uses are being explored. It is estimated that a mix of new employment floorspace, housing and complimentary food and beverage commercial uses will be proposed. The concept masterplan for the site is currently being prepared for the site. Further development of the site is expected to come forward in phases with detailed masterplans being developed to support each phase.

Employment development as part of major housing allocations -

Kings Barton Major Development Area (Policy W1)

10.42 A new local centre is being developed as part of the major housing development at Kings Barton, Winchester. Retail development to meet locally generated needs and small-scale employment uses are sought as part of the development of the local centre. However, at present it is not anticipated that the centre will include significant amounts of employment land.

South Hampshire Urban Area.

10.43 This area comprises the major source of modern large-scale business development within the district. It is appropriate that this continues and supports growth throughout the wider South Hampshire Area. There are several large employment sites

which have been under development for a number of years and the plan provides for these to continue, with no additional allocations proposed.

Solent Business Park (Policy SH4)

10.44 Outstanding area remaining of Solent Business Park. Approximately 11,000 sqm is allowed for, within the 4 ha area, for a range of high technology and business use within Use Class E(g).

Employment development as part of major housing allocations -

West of Waterlooville (Policy SH1)

10.45 Provision of about 23 ha of employment land within the larger development. The ETCUS indicates that of the 23 ha of employment land allocated at this location, as at 31 March 2022 15.25 ha remains available. In addition, a local centre which should provide a small amount of retail is also proposed, along with commercial and mixed housing/commercial uses. It is envisaged that the employment offer at the local centre will be focused on offices, which will complement the more general employment land within the main commercial area.

Market Towns and Rural Area

10.46 The Local Plan supports opportunities to diversify the economy within the settlements and support their role as locations for local employment and important service centres, will be supported. There are a number of existing site allocations at Bishops Waltham, New Alresford and Waltham Chase that have been demonstrated that they are deliverable, but no new allocations are proposed.

10.47 Outside the settlement boundaries, development is strictly controlled in the interests of preserving the rural environment. Economic development will be supported where it supports the diversification of the rural economy and limited development consistent with the high quality environment, as specified in Policies SP3 or E9, E10, and E11.

Tollgate Sawmill, Bishops Waltham (Policy BW3)

10.48 A 2.6 ha site of which at least 2.2 ha should be employment use, with a limited amount of enabling residential development if necessary. The employment uses should be research and development (E g(ii), light industrial (E g (iii)) and storage and distribution (B8). A small amount of general industrial use (B2) will be allowed on part of the site.

Employment development as part of major housing allocations -

Sun Lane, New Alresford (Policy NA2)

10.49 Approximately 5 ha of land to provide business development was allocated to form part of this 30 ha site. Further work and subsequent planning applications 17/1528/OUT and 23/02845/REM indicated that 3.0 ha of employment land will be delivered.

Morgans Yard, Waltham Chase (WC1)

10.50 Employment uses to be provided as part of the development of the site for housing. Details will be developed as part of masterplanning of the site and should include employment generating uses to replace some of the existing jobs lost on the site. Further work and subsequent planning application 21/02439/FUL indicated that approx. 1.8 ha of employment land will be delivered.

Amendment to policy

New employment opportunities **floorspace** will be encouraged throughout the district **to fulfil identified needs** in accordance with the vision and objectives of the plan and, the spatial strategy as follows, **the strategic employment policy E1 and the site allocations listed below:**

~~Within~~ Winchester Town **Area -**

- ~~Bushfield Camp (Policy W5) About 20ha new employment land~~
- Winnall (Policy W6)
 - i. ~~Station Approach Regeneration Area (Policy W8~~
 - ii. ~~Central Winchester Regeneration Scheme (Policy W7)~~

Mixed use allocations;

- Central Winchester Regeneration Scheme (Policy W7)
- Station Approach Regeneration Area (Policy W8)

As part of major housing allocations;

- King Barton Major Development Area (Policy W1)

South Hampshire Urban Area –

~~i. Continued development of the following sites;~~

~~Solent Business Park (Policy SH4), West of Waterlooville (Policy SH1) and Little Park Farm (Policy SH5)~~

- **Solent Business Park (Policy SH4)**

As part of major housing allocations;

- **West of Waterlooville (Policy SH1)**

Market Towns and Rural Area -

- **Tollgate Sawmill, Bishops Waltham (BW3)**

As part of major housing allocations;

- **Sun Lane, New Alresford (NA2)**
- **Morgans Yard, Waltham Chase (WC1)**

Appropriate growth and maintenance of existing employment within the key settlements in accordance with the principles set out in SP2.

Outside settlement boundaries economic development will be supported where it supports the diversification of rural economy and limited development consistent with the high quality environment, as specified in policies SP3, E9, E10 and E11