

## **Privacy and publication**

We are unable to legally accept anonymous submissions to the consultation. You must therefore provide your consent below before you are able to submit your response.

### **Privacy Notice**

Any personal information that you supply to Winchester City Council will only be used for the purposes of the work required to prepare a Local Plan under the Planning Acts. We need to collect this information in order to maintain accurate records to ensure that you can be properly involved in the preparation of the Local Plan. This will include general updates on the progress on the Local Plan, sending updates/surveys/newsletters, inviting comments on the Local Plan as it moves through its statutory stages and being notified of the date of the Local Plan Examination and be invited by the Inspector to speak at the Local Plan Examination. Any comments that are received in connection with the Local Plan will be published but they will only display the person/organisation name and postcode beside them. Any information that is received, including contact details, will only be kept until the Local Plan is adopted.

As part of our statutory functions, we will share data with the Planning Inspectorate who will hold the Public Examination on behalf of the Ministry of Housing, Communities and Local Government. You have the right to see what information is held about you, to have inaccurate information corrected, to have information removed from our system unless we are required by law or a statutory purpose to keep it and the right to complain to our Data Protection Officer if you feel that your data has not been handled in accordance with the law.

Further information about how Winchester City Council uses personal information can be found on our website at [www.winchester.gov.uk/strategies-and-policies/privacy-policy](http://www.winchester.gov.uk/strategies-and-policies/privacy-policy).

- 1. Please confirm that you have read and understood the above.**

**(Required)**

## About you

Please add your personal details below. If you are acting as an agent, please also fill in your details where requested below.

The Town and Country Planning (Local Planning) (England) Regulations 2012 requires copies of all representations to be made publicly available, therefore we cannot accept anonymous representations. The Council will publish names and associated representations on its website but will not publish personal information such as telephone numbers, or email addresses.

You must fill in these details before you can submit the form.

### 2. What is your full name or client's name if acting as an agent?

Name of respondent (or client): [REDACTED]

### 3. If you are representing an organisation or acting as an agent, please provide the name below.

Organisation/Agent:

### 4. What is your address?

If you are responding on behalf of an organisation, please put the organisation's address below. If you are acting as an agent, please put the company address below.

House number/name: [REDACTED]

Street address 1: [REDACTED]

Street address 2:

Town/area: [REDACTED]

Postcode: [REDACTED]

### 5. What is your email address?

Email address: [REDACTED]

**6. What is your phone number?**

(Required) [REDACTED]

Phone number:

**7. By submitting this form I acknowledge that;**

- a) my response, together with supporting information, which includes my name, address and contact details will be sent to the Local Plan Examination Programme Officer and the Planning Inspectorate; and**
- b) my name will be published, together with my response, in the Winchester City Council Local Plan Examination website.**

**8. Please select the box below if you would like to be kept up to date on the developments to the Local Plan via the email you have provided?**

- Yes, I would like to be kept up to date with Local Plan developments
- No

**What area of the Local Plan would you like to comment on?**

Policy and paragraph number: (Required)W5, W10, W9, W3 & some general points about the document.

**Do you consider the supporting text and policy are:**

(Required)

	<b>Yes</b>	<b>No</b>
<b>Legally compliant</b>	<input type="checkbox"/>	<input type="checkbox"/> X
<b>Sound</b>	<input type="checkbox"/>	<input type="checkbox"/> X
<b>Complies with the duty to co-operate</b>	<input type="checkbox"/>	<input type="checkbox"/> X

Please give details to support your answer above: Please be as precise as possible and include any paragraph/policy numbers that your comments relate to. (Required)

Please make sure that you put in all the evidence and information needed to support your representation.

I should like to make a few comments on the District Local Plan 2020-2040, Reg 19, but do not wish to use citizenspace. I hope very much therefore that this timed and dated email will suffice.

578 pages is too much for any unpaid individual to deal with, and I find the way citizenspace leads one through to be too prescriptive. In fact dealing with different strategies, objectives, policies etc. drives home the need for an overarching masterplan, for the city if not for the entire district, so no development area, for example, is considered in isolation. I believe some of the more recent developer partners are also keen for this, but council officers have been opposed for many years.

My particular concerns are with **W5, Bushfield Camp**, where I wholeheartedly endorse the submission made by the umbrella body that includes parish councils, the City of Winchester Trust, WinACC and others. I would stress that it is disingenuous to describe it as a 'former army camp': it was used in wartime, as were many sites that would not otherwise have been taken over such as historic houses and much open land. There was some sporadic subsequent use, but I believe it was last used over 50 years ago. Barely any of it now can honestly be called brownfield. In view of all the declarations of climate change emergency, biodiversity emergency, and general green policies, combined with lack of evidence of need for employment - the ONS says the unemployment rate is 2.7% - it should not be developed at all.

**W10, the former River Park Leisure Centre Site.** This is allocated for Learning and non-Residential Institutional use on the basis of wishful thinking. There is no evidence that the University of Southampton ever wanted the site in the first place - in fact Freedom of Information requests show that it was the council that approached the university some time in 2019, and the university initially declined. Subsequent Fols indicate that no agreement has ever been signed, despite the WCC plan being launched very nearly three years ago.

The Heads of Terms for the proposed agreement, published by WCC for the cabinet meeting of 21st November 2021 (CAB33324), make it plain that the granting of the lease is contingent upon 'planning permission for tertiary education buildings on the RPLC site is secured within 5 years.' Some of the language in W10 gives the impression that there is a plan, and that permission has been given: " ix. *The proposals are designed to complement and enhance the appearance of the River Park Recreation Ground and provides a suitable and attractive gateway into the City;* x. *The proposals are designed to be permeable, that includes publicly accessible performance/events space that benefits the City;*" There are no proposals.

W10 states at 12.108: "There is an opportunity as part of the redevelopment of this site to enhance the city's cultural offer in an area of considerable historic importance." Winchester can barely look after the cultural offer it has. The Hampshire Cultural Trust, who say "we manage and support visitor attractions, museums, art galleries and arts centres across Hampshire that were previously operated by Hampshire County Council and Winchester City Council" has been making redundancies, the county reference library at what is now the ARC is a shadow of its former self, assets that used to be free are now charged for (which is highly likely to result in reduced footfall), long-held and convincingly funded plans for a multi-use music centre have come to nothing - 14 years of austerity (and little government love for culture even before that) have meant that the sector is barely surviving. HCT requires partnership funding from the local

authorities; it has announced the closure between autumn 2024 and 2026 of five venues across the county. Relying on Southampton University, whose own Nuffield theatre on campus went under during the pandemic, while Nuffield City had to be rescued, seems unwise. The offer of unspecified cultural goodies is a very shaky basis on which to put the site into the plan.

Far better for cultural provision would be to reuse and adapt existing buildings. This is acknowledged in 10.60, Town Centres Strategies and Hierarchy: 'In consideration of recent social, economic and legislative changes, town centres will need to change and adapt with retail development being supported by a much wider range of uses and activities, such as green space, leisure, arts and culture and health and social care services combined with housing to create a space based on social and community interactions.' Turgid plan-speak, perhaps, but opportunities for local bodies and individuals to create art of various kinds in existing repurposed buildings should be encouraged, as happened about 30 years ago with the Colour Factory at River Park.

Not only has the financial situation changed since it was first proposed to decommission the old River Park Leisure Centre; so has the environmental situation. Much is made of proximity to the South Downs National Park and Winnall Moors, but increasingly often flooding means Winnall Moors is closed off. 12.105 says 'Due to the proximity of the site to the River Itchen, it is located within a flood risk area and the groundwater levels are less than a metre below the surface which are important considerations that would need to be taken into account as part of the redevelopment of the site.' The site should be returned to what it was, i.e. water meadows, or a green sponge, rather than having more, taller, buildings.

The Heart of Reeds in Lewes was commissioned by the local wildlife trust to encourage biodiversity, in which it has succeeded triumphantly. In addition it helps manage flood risk. This is the sort of imaginative solution that could be provided at River Park. And as it was created by a noted artist, Chris Drury, it could also be said to fulfil the cultural commitment, such as it is.

Then there is the scandal of the water companies and the dumping of sewage. The Itchen is a precious and highly protected river. The permission given by WCC to the football club at River Park to replace real turf with plastic will further endanger water quality and biodiversity, and increase run-off. The existing building has minimal foundations and only the engine room is even half below ground. (The plans from the 1970s are in the Hampshire Archives.) The promised demolition will cause some disturbance but the subsequent building of a far larger and taller structure would cause much more.

To reiterate, W10 is unsound and should be dropped in favour of the environment and biodiversity.

Next, if not numerically, there is **W9, Bar End Depot**. This became available for development when the new leisure centre was opened at Bar End about two years ago, but it was known to be a future development site for far longer. My reason for mentioning it here is to do with the section on Living Well etc.: '5.5 Community engagement is also integral to the design process as it leads to a better informed scheme which identifies and addresses local issues.' I can't count how many times the community has been consulted on this particular site but they have been routinely ignored. There is talk in Reg. 19 of local food, healthy lifestyles etc. The community behind Bar End is desperate for local shops, community facilities and opportunities, all detailed in the Highcliffe Community Plan of 2017, but what is proposed is housing with care facilities (a large development of that nature opened only a few years ago further into town on the same road) and a convenience store, which is a type known for the least healthy offer generally combined with high prices. W9 makes a mockery of community involvement.

Lastly, to be positive for once, I welcome **W3, St Peter's Car Park**, with its proposal for housing. This was actually promised at least 20 years ago, when Park & Ride was first introduced, the idea being that as P&R came in, so city car parks would be closed and built on. St Peter's was to be the first. So this is long overdue. I note that on p. 325 the plan is for 30 houses, and on p. 220 it says 40. The car park has many of the same issues as the RPLC site, i.e. it is surrounded by water and flood-prone. However, it is currently all tarmac, so using half the area for housing and half for flood mitigation would provide a pleasant setting and good landscaping. The housing, I sincerely hope, will be social and genuinely affordable which is what Winchester most needs.

**What modification(s) are necessary to make the policy legally compliant or sound?**

**Remove W5 and W10, replace the text of W9 with the 2017 Highcliffe Community Plan, and make sure W3 is developed with social housing and not left at the mercy of developers.**

**What is your suggested wording or text for the policy:**

**This is not my job, to reword the Winchester Local Plan. My requests for change are as above.**

**The Inspector will decide on who will appear at the hearing(s). You may be asked to take part when the Inspector has identified the matters and issues for examination. If the Inspector invites you, do you consider it necessary to participate in the examination hearing sessions?**

(Required)

Yes, I want to take part in a hearing session if I am invited to by the Inspector to participate

No, I don't want to take part in a hearing session