

Winchester City Council Local Plan Examination

Our ref 64121/01/NG/NWh
Date 14 April 2025
To Programme Officer
From Lichfields obo Church Commissioners for England

Subject Matter 16: Creating a Vibrant Economy (including site allocations)

This hearing statement has been submitted by the Church Commissioners for England ('the Commissioners'). The Commissioners are promoting Bushfield Camp which is allocated in the adopted WCC Local Plan (Policy WT3) and also in the emerging WCC Local Plan (Policy W5). Lichfields submitted representations on behalf of the Commissioners to the Regulation 19 Local Plan Consultation which were given the personal reference number: **ANON-AQTS-32U5-8**.

- 1.1 As per the above note, this hearing statement has been submitted on behalf of the Commissioners, the landowner of Bushfield Camp. Our responses to the below questions have been provided in the context of the Bushfield Camp allocation. We acknowledge that it is for the Council to provide comprehensive responses to the questions, particularly where these relate to district wide issues.

Employment and Retail Requirements

Q1.

- 1.2 Yes. WCC's Employment Land Study (July 2024) (VEO8) includes seven employment land scenarios that have been developed and assessed in the context of the wider economic factors, economic baseline, and stakeholder feedback. The final requirement is derived from the forecasts based on the past completions trend and average of the three labour demand forecasts with working from home ('WFH') adjustments. This is because these are considered to provide the most reasonable and robust estimate of future employment land needs. On this basis, the Commissioners consider WCC's employment land requirement is sufficiently justified and based on robust evidence.

Q2.

- 1.3 WCC's identified supply of 39 hectares of employment land includes the Bushfield Camp site (Policy W5). Bushfield Camp is the main employment allocation in the Plan and is therefore key to the Council meeting its economic and employment objectives. It is an existing allocation but is deliverable – see response to question 6 below. The current application for the site ([ref. 23/02507/OUT](#)) submitted by the Commissioners in partnership with Legal & General ('L&G') and Gisborne Investment Group ('Gisborne'),

demonstrates that it is a viable employment site that will be brought forward delivering a mixed-use employment-led scheme. It will generate significant economic benefits for Winchester and the wider area, as set out in the suite of documents that accompany the planning application including the Planning Statement (accessed via the Council's website using ref. [23/02507/OUT](#)), which include, but are not limited to the creation of 3,790 jobs.

Q3.

- 1.4 Yes. As per the above, Bushfield Camp is the main employment allocation in the plan. The current application for the site (ref. 23/02507/OUT) proposes to deliver a mix of uses including, office (use class E(g)(i)) and R&D (use class E(g)(ii)), helping to meet the employment needs of the District.

Q4.

- 1.5 No comments.

Q5.

- 1.6 Please see our response to Policy E5 question 1. Broadening the type of uses to be included within the definition of 'employment' more accurately reflects the employment base of the District and allows for flexibility and for future need, not allocated within the Local Plan, to be accommodated.

Winchester Employment Allocations**Policy W5 – Bushfield Camp****Q1.**

- 1.7 At point (i) of Policy W5, and in the supporting text at paragraph 12.58, the process for securing a masterplan for the site is clearly explained. This ensures that any application for development is preceded by, and is consistent with, a comprehensive and evidenced based site wide masterplan – which has involved engagement with stakeholders and interested parties before it is agreed.
- 1.8 This process has already been undertaken by the Commissioners and their partners for the Bushfield Camp Proposals. [A site wide masterplan](#) for Bushfield Camp was progressed in advance of submitting the outline planning application. The masterplan was shaped by discussions with WCC and statutory consultees during the pre-application process. This has ensured the development of the site, the proposed land uses and other parameters, are acceptable in planning terms.
- 1.9 The Bushfield Camp Concept Masterplan was presented to WCC's Cabinet in June 2023 and was [endorsed by Members](#). Members resolved that the Bushfield Camp Concept masterplan would be a material consideration to inform the development management assessment of the planning application – carrying the same status as Interim Planning Guidance. In our view, the policy is effective.

Q2.

- 1.10 The limit to the total area of the development to 20 hectares of land prioritises the use of the previously occupied part of the site, which comprised the former military camp. In our view, its inclusion is appropriate. The pre-application design process for the current application (ref. 23/02507/OUT), as set out in the accompanying Design and Access Statement, tested the site's constraints and the resulting scheme proposed in the outline application has been shaped by these parameters. It demonstrates that the development of Bushfield Camp is deliverable without any unacceptable impacts on the site constraints.

Q3.

- 1.11 WCC's Employment Land Study (July 2024) (VEO8), which supports the emerging Local Plan, establishes a requirement for 27.6 – 38.9 ha of employment land between 2022 and 2040 based on past completions trends and an average across three economic forecast scenarios. This includes 3.3 – 12.2 ha of dedicated office space. The Study indicates that for the office sector, all of the labour demand scenarios identify a need for more land than the forecast based on past completions due to all of the forecasts showing considerable jobs growth in sectors typically requiring office space (para. 10.4). The future office requirements shown in the baseline forecasts identify a need for 12.2 ha of office land, however the Study acknowledges that this could be lower as working practices remain unsettled due to an increase in homeworking.
- 1.12 The employment land supply (as of March 2022 – see Table 55 of the Employment Land Study) includes 20.58 ha of permissions and 29.28 ha of allocations – totalling 49.86 ha. Table B (page 263 of the emerging Local Plan) sets out the allocated sites and estimated amount of employment land – totalling 33.2 ha allocated – estimated to provide 19.18 ha of employment land.
- 1.13 Bushfield Camp, allocated for 20 ha of development (estimated as providing 11.8 ha of employment land), is the only major employment allocation in the emerging Local Plan. It is therefore justified that the allocation supports the provision of office space. The current Bushfield Camp proposals include the provision of 30,359 sqm (GIA) of office space – equivalent to 3 ha, in line with the minimum requirement within the emerging Local Plan.

Q4.

- 1.14 As identified above, Bushfield Camp is the only site identified (and allocated) that is of a size and scale that can provide a scheme of sufficient 'critical mass' to significantly improve the range and type of jobs currently available in the district. WCC's approach to the allocation of the site has been to define the proposed uses in a broad way, enabling a comprehensive approach to be taken regarding the future development of the site. This reflects paragraph 86 of the NPPF (2024) which recognises that planning policies should be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices, and to enable a rapid response to changes in economic circumstances.

- 1.15 Paragraph 12.57 of the emerging Local Plan indicates that the site may be suitable for high quality flexible business and employment space, education and creative industries, an innovation hub and has the potential for complementary uses that are appropriate for such a unique location. Given the site has been allocated since 2013, and development for a pure 20 ha 'employment' use (such as office development or a typical business park) has not come forward, WCC consider a wider and more flexible set of employment uses are appropriate for the site. This is exactly why the Commissioners have partnered with L&G to deliver the scheme that is currently proposed.
- 1.16 The Commissioners and their Development Partners' vision for the Bushfield Camp site is to provide an employment-led mixed-use development with the potential for significant growth and investment – ultimately delivering a new Knowledge Quarter for Winchester and the region. In recent years, UK universities and academic institutions have recognised the importance of urban campus developments and innovation clusters in promoting their growth and enhancing their performance. This is also true of high-tech industry and global research institutions.
- 1.17 The Bushfield Camp 'Knowledge Quarter' will involve the creation of a campus on the edge of the existing city, which integrates with the surrounding communities, offering access to a wide range of amenities and services. It will provide workers at the site with a unique and vibrant environment that promotes innovation, collaboration, and creativity – with social and environmental benefits. The balance of uses at the site, with supporting amenity and facilities is considered to be essential to creating place and establishing a 'Knowledge Quarter' identity. It is therefore essential that development proposals for the site provide a range of local services and facilities to ensure the site becomes a place that can attract and retain world-class companies, knowledge and talent, in line with the strategic overall objective of the emerging Local Plan which is to positively and proactively encourage sustainable economic growth over the plan period.
- 1.18 Environmental and social development is also delivered through the scheme's proposals for the 'legacy land' – c. 60 acres of green space at the site that will become protected from future development. Prioritising sustainability and community, through the creation of this publicly accessible space will provide a lasting legacy for Winchester and will also support the aims of WCC's Green Economic Development Strategy. The development also promotes sustainability through measures to ensure that the site is accessible by a choice of transport modes including cycling and buses.

Q5.

- 1.19 It is not considered that this is required within the policy wording. The current proposals for Bushfield Camp including the provision of a Wastewater Treatment Works within the first phase of construction. This infrastructure, and its provision on site, would likely be a condition of the approval of permission and the detail would be agreed through the reserved matters process. We consider that the policy does not need to consider this further.

Q6.

- 1.20 The Commissioners is the longstanding landowner of the Bushfield Camp site. They have undertaken substantial supporting initiatives to facilitate the development of the site, in particular over the last 6 years. In this period since 2019 and during the Covid pandemic, a strategic development partnership has been contractually documented between the Commissioners, L&G and Gisborne to deliver a full scale, net zero carbon, ESG exemplar mixed use development on the Bushfield Camp site. There are no legal or ownership impediments to development on this site.
- 1.21 Historically the main issue in bringing forward a scheme on the site, and hence the allocation being carried over from the extant Plan, has been the adversity in market conditions for the traditional employment led office campus/business park model. Over the last 10 years this sector and model has suffered from a lack of viability and vitality in the UK market which has restricted development options. The creation of the development partnership with L&G/Gisborne was a significant factor in the timing of bringing forward development proposals.
- 1.22 The UK market conditions for employment-led development schemes has now entered a new and dynamic phase led by the life science, media, digital operations and academic sectors. The nature, design and contexts emerging are predicated by next generation lifestyle choices dictating a much more sophisticated blend of uses in the live/work schemes currently leading the national development pipeline. Leading UK and global corporates seek sites with development canvasses which can fulfil state of the art office concepts, supported by integrated homes, wellbeing and leisure facilities coupled with appropriate amenities in demonstrably sustainable environments. From a previously deflated and unpredictable set of conditions the post pandemic demand has triggered the emergence of high demand for ESG led schemes with high lifestyle and amenity values in decentralised UK locations. Winchester is consistently named as one of the UK's leading lifestyle locations and hence the viability and timing of Bushfield's potential is now resurgent.
- 1.23 As a consequence of the above, L&G and Gisborne as joint developers identified Bushfield as a highly attractive development proposition ideally suited to meeting demand if a suitably broad allocation of uses can be obtained. This is essential to facilitating a making of place, with exemplar ESG principles, collaboratively curating a new quarter for Winchester by the employment of market leading ethical and social practices, state of the art design governed by long term investment ownership modelling and full use of significant L&G capital resources. As developers, L&G and Gisborne determine Bushfield to be a viable development for retention on completion as a long-term investment hold.
- 1.24 As such, an outline planning application for the site was submitted in October 2023 (ref. 23/02507/OUT). A decision is expected later this year. The construction of the proposed scheme is anticipated to be brought forward over a period of approximately 11 years, from 2025 to 2036. This is expected to be staffed over five phases with the first buildings constructed in 2027.
- 1.25 The development of the Bushfield Camp site is therefore deliverable within the emerging Local Plan period. There is a clear and demonstrable commitment from the landowners

(the Commissioners) and development partners (L&G and Gisborne) to bring forward development on the site, evidenced through the submission of application ref. 23/02507/OUT and the subsequent work to progress the application to a successful determination.

Q7.

- 1.26 Revised wording was included at policy point (xv) at the Regulation 19 stage. This relates to adverse effects on the River Itchen SAC in relation to Air Quality.
- 1.27 Since the inclusion of this wording, an updated Statement of Common Ground ('SoCG') has been prepared between WCC and Natural England (ED19). In relation to Air Quality, it confirms that Natural England support the additional policy criteria (xv) in Policy W5 (Bushfield Camp).
- 1.28 However, the SoCG also notes that following Natural England's representation on the Regulation 19 Local Plan, WCC undertook an Air Quality Assessment (SDO4b). The assessment concludes that the Local Plan would decrease pollutant concentrations/deposition rates at the River Itchen SAC. Therefore, the Local Plan would not have an adverse effect on the site integrity of the River Itchen SAC.
- 1.29 Consequently, the Council published an addendum to the Habitats Regulations Assessment (SDO4a) which concludes that there will be no adverse effects on the integrity of the River Itchen SAC due to air pollution. The addendum to the HRA also recommends the removal of point (xv) from Policy W5 (Bushfield Camp), as adverse effects have now been ruled out.
- 1.30 The Commissioners support the Council's recommendation to remove this wording. It should also be noted that Chapter L of the Environmental Statement that accompanied planning application (ref. 23/02507/OUT) included an assessment of the impact of air pollutant emissions from traffic generated by the development on surrounding nature sites, including the River Itchen SAC. This was carried out utilising air quality modelling and followed the institute for air quality management guidance. The results of the modelling quantified the impact on air quality and the significance of the effects determined.
- 1.31 Point (xvi) of Policy W5 includes a requirement for the proposals to consider the potential impacts of wastewater (nutrients) produced by the development upon the Solent SAC and River Itchen SAC and identify suitable mitigation. Given the ongoing nutrient neutrality issues within the District we consider the inclusion of this wording is appropriate. Nutrient neutrality issues have been dealt with in the current application proposals (ref. 23/02507/OUT) and a Wastewater Treatment Works for the development is proposed.

Policy E5 – Enhancing Employment Opportunities

Q1.

- 1.32 The wording of Policy E5 point (iii) is fairly restrictive. It does not account for other types of uses that do not necessarily fall within "Sui Generis" that can also be employment generating or business led, for example, academic institutions which employ a number of staff through teaching, research, business and administration roles.

- 1.33 On this basis, we would recommend that the wording of point (iii) should be amended to refer to “other uses” or “other activities” rather than Sui Generis. This would allow for flexibility yet would still provide the Council with control to assess matters on a case by case basis

Q2.

- 1.34 Subject to the above recommended modifications to the wording of Policy E5, we consider the wording to be clear and unambiguous.