

Policy W6: Winnall

Overview of Comments:

Support - 5

Neither support or object - 6

Object - 7

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 which neither support nor object to Policy W6 - Winnall		
Respondent number	Comment	Officer comment
BHLF-KSAR-N86F-K Natural England Link here	Paragraph 12.52 refers to the improvements at M3 Junction 9 having been paused. This project is due to go to Development Consent Order submission imminently, and the text of this paragraph should be updated accordingly. The improvements include new cycle and pedestrian access to the South Downs National Park. Welcome that the Policy seeks to maximise the creation and improvement of pedestrian/cycle links with the surrounding area and the M3 Junction 9 planned improvements.	Point of clarification notes. Recommended response: Change paragraph 12.52 as follows: National Highways were in the process of applying for a development consent order for improvements to Junction 9 of the M3 motorway. However, the Government has paused work on all smart motorway projects that were in their early stages, including the M3 Junction 9-14 project. Planned improvements to Junction 9 of the M3 are the subject of a Development Consent Order. Part of these proposals include the creation and improvements

	<p>Any development or redevelopment site should be sensitive to its location adjacent to Winnall Moors which is part of the River Itchen SSSI and River Itchen SAC. The policy should consider incorporating measures to protect the site from surface water run-off and creation of a green buffer to the designated site where possible.</p>	<p>include new cycle and pedestrian access to the South Downs National Park.</p> <p>Point of clarification would be a useful addition to the supporting text: Recommended response: Add wording as supporting text between paragraph 12.54 and 12.55 Any development or redevelopment site should be sensitive to its location adjacent to Winnall Moors which is part of the River Itchen SSSI and River Itchen SAC. Opportunities should be taken to incorporate measures to protect these sites from surface water run-off and creation of a green buffer to the designated site where possible.</p>
<p>BHLF-KSAR-N86T-1 Hampshire County Council (Transport)</p>	<p>The existing industrial and retail land uses in Winnall are a major generator of commuting trips and are predominantly accessed by private car. Many premises have off-street parking available free to staff, or unrestricted on-street parking, incentivising car travel. The Easton Lane area experiences high volumes of private car movements at peak times, resulting in queuing traffic at junctions. This situation is not in line with the emerging LTP4 or Winchester Movement Strategy, which would seek to change the current situation by improving access by public transport and active travel. Without action to improve sustainable travel choice, with the completion of the National Highways M3 Junction 9 improvement scheme, this situation could worsen.</p>	<p>Whilst these points are noted, the car parking courts for these industrial premises would have had to be submitted and assessed as part of planning application process. Developers would have applied the HCC car parking standards and it is one of the main reasons why the city council has not included car parking standards in the Reg 18 LP as this go against the climate emergency and the need to encourage people to use more sustainable modes of transport. Recommended Response: No change.</p>

	The completion of the Junction 9 improvement scheme is forecast to increase in vehicular movements along Easton Lane / Wales Street and is also likely to result in shorter and more reliable journey times on the north eastern part of Easton Lane to access the M3/ A34/ A33 and A31.	This a matter that would need to be addressed as part of the Development Consent Order rather than Policy W6 in the Local Plan. Recommended Response: No change.
BHLF-KSAR-N8Z7-8 South Downs National Park Authority	The allocation needs to reference Policy NE8 (South Downs National Park) and set out that the proposed development will be within the setting of the SDNP. As such, development will need to be sensitively located and designed to avoid or minimise adverse impacts on the SDNP.	It is important to read the Local Plan as a whole and in this respect, it is not necessary to include Policy NE8 in Policy W6. Recommended Response: No change.
BHLF-KSAR-N8BH-1	The primary purpose of Policy W6 is to safeguard existing industrial premises, with some redevelopment for B2 and B8 also permitted and some alternative uses in specific sub-areas. This is unlikely to allow any significant scaled B8 storage and distribution units as there are different ownerships and buildings, and there are no genuinely vacant sites. The immediate highway network capacity to the strategic road network is less than ideal and unlikely to be attractive to potential end users.	Policy W6 has been worded to do exactly this and for the reasons stated, it is unlikely that as sites are in multiple ownership that there would the opportunity to do this at any scale. The Policy does not specifically preclude this from happening. Recommended Response: No change.
ANON-KSAR-NKJ6-A	There should be more focus on developing a plan for the area that acknowledges the poor existing planning and potential to to enhance the land usage and create a more mixed use area.	For the reasons noted above, it is considered to be unlikely that there will be significant change in this area. As the site is the largest employment area in Winchester, there are no plans to make this site mixed used. Recommended Response: No change.

Comments which object to Policy W6 - Winnall

Respondent number	Comment	Officer comment
<p>BHLF-KSAR-N8BE-X</p> <p>Environment Agency Link here</p>	<p>Based on the information currently available, the site raises some environmental concerns that need to be addressed. Further work will be needed to show how these can be satisfactorily addressed.</p> <ul style="list-style-type: none"> • Historic landfill sites • principal and secondary A aquifer, • FZ 2 and 3 • main river within 8m of red line boundary- • River Itchen • Land use contamination risk (industrial) <p>Flood Risk. For the policy to be sound a level 2 SFRA should be undertaken to provide a greater degree of certainty, both now and with climate change. It has not been demonstrated that this site allocation provides wider sustainability benefits to the community that would outweigh flood risk.</p> <p>Water Quality. There may be contamination issues with this site. This may include PFAS issues from former chemical industries. The site is not in any SPZ but on principal aquifer and adjacent to sensitive surface water receptors, so would be regarded as sensitive.</p>	<p>See above point. This is an established employment site and it is unlikely that there will be significant re-development taking place in this area. This point has now been agreed with the EA.</p> <p>Recommended Response: No change.</p>
<p>ANON-KSAR-NKZX-V</p>	<p>Support the general approach to Winnall and its allocation for employment use, it is important to ensure that future development for appropriate employment uses, has clear</p>	<p>Comments noted and support welcomed.</p>

	<p>Local Plan support.</p> <p>The references to B2 and B8 uses should be expanded to include Class E(g)(ii) and (iii). The wording appears to have arisen following the changes to the Use Classes Order where former B1 use Classes were incorporated within new Class E. These are still employment uses that are entirely appropriate in this location (in accordance with the allocation for 'employment' use), and should be explicitly supported in the new Local Plan, as within the current adopted Local Plan, which supports B1(b) and (c).</p> <p>This would ensure consistency with the definition of 'employment uses' within Policy E5 and the support for new employment opportunities under Policy E2. It reflects a number of existing such uses within Winnall, including sub area 1..</p> <p>Policy W6(i) is somewhat ambiguous as it suggests that existing employment uses be retained, which could be interpreted as preventing the redevelopment of outdated employment sites for modern employment premises. The policy should state that the redevelopment of existing employment sites for employment use is supported.</p> <p>The policy adopts an inconsistent approach to the application of Policy E6. Policy E6 is referred in the introductory paragraph, and only afterwards in criteria W6(ii) and (iv). There may be instances where sites within sub-area 1 are no longer suitable for employment use, or there is no demand for premises. Policy W6 should incorporate flexibility for other uses to come forward where it can be</p>	<p>Comments noted. The wording of the use classes order has been updated to reflect the updated Use Classes Order.</p> <p>Recommended Response:</p> <p>Change the wording as follows:</p> <ul style="list-style-type: none"> i. In sub area 1, which is the core employment area in Winnall focussed on Moorside Road, there is a presumption in favour of the retention of existing B use class employment uses and the creation of additional B2 (General industry) and B8 floorspace (Storage and distribution) to ensure this area continues as a centre for more traditional employment opportunities. ii. In sub area 2, along Easton Lane, the council will adopt a more flexible approach in applying Policy E6 (retention of employment land and premises) and may permit B use class
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	<p>demonstrated that the retention or provision of employment uses is no longer appropriate under Policy E6, in all sub-areas.</p>	<p>employment generating uses outside of the B2 and B8 Use Classes. There is a presumption in favour of the retention of existing B uses classes and the creation of additional B2 and B8 floorspace to ensure that this area continues as a centre for more traditional employment opportunities. Where feasible all new development including change of use will be required to:</p> <ul style="list-style-type: none">▪ provide a range of flexible employment opportunities;▪ provide tangible improvements to the public realm;▪ provide an attractive, active frontage which addresses the street and avoids bland rear / side elevations onto Easton Lane; <p>and</p>
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		<ul style="list-style-type: none"> ▪ provide a Travel Plan that demonstrates sustainable active travel that meets the requirement of the development for staff and commercial users to meet the requirements of the proposed development; and ▪ if a new town centre use as defined by the NPPF is proposed, provide evidence to show that the use requires an out-of-centre location and that a 'sequential approach' has been applied to demonstrate that the use could not reasonably be accommodated in a more sequentially-preferable location. <p>iii. in sub area 3, the council will retain existing</p>
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		<p>employment uses and encourage the sub-division and development of units to create provision for start-up businesses and small to medium enterprises (SMEs), Uses with Class E (g) (ii) and E (g) (iii) (which can be carried out in any residential area without detriment to the amenity of the area).</p> <p>iv. in sub area 4 applications for uses outside of B2 and B8 uses will be considered against the requirements of Policy E6 (retention of employment land and premises), in the context of adjoining land uses.</p>
BHLF-KSAR-N8BD-W	<p>It is important to protect employment sites so Policy W6 should be clearer and stronger. The criteria allowing non B use class employment for sub areas 2 and 3 should be consistent with those for sub area 1, namely: "...there is a presumption in favour of the retention of existing B use class employment and the creation of additional B2 and B8 floorspace to ensure Winnall continues as a centre for more traditional employment opportunities."</p>	<p>Points noted but this is the whole reason why the Winnall industrial estate has been divided up into different zones. It is considered that there is more scope within sub area 2 and 3 for employment uses that fall outside of B2 and B3 uses which is an approach that has been taken in the existing adopted LP.</p> <p>Recommended Response: No change.</p>

	There is scope for “start up businesses” referred to for sub area 3 and for “B uses outside B2 and B8”, referred to for sub area 3 within National Planning legislation and on their merits, through the planning process.	
ANON-KSAR-NKYT-Q	This site is roughly the same area as Bushfield Camp so 'employment' should offer the same range of employment, business and education & creative industry opportunities as on the Bushfield Camp site. It is close to student housing, the same side of town as 'InTech' and closer to the 'Art College' site on this side of Winchester. There is probably no need for further social housing on this site, nor much more commercial activities, but attention should be given to 'greening' the area with more space for sport and leisure, possibly with associated facilities.	The two employment sites are intended to offer a different but complimentary employment offer. The emerging plans for the Bushfield Camp site are centred around a very different employment market. Unlike the Winnall industrial estate, the site at Bushfield Camp has a major advantage that it is in one single ownership that would allow the creation of an innovation and creative campus. As Winnall is a thriving employment area it is not considered appropriate to promote it for sport and leisure facilities which should be directed to towards town centres in accordance with the Government's NPPF. Recommended Response: No change.
ANON-KSAR-N8GA-Y	Suggest revised text for Policy W6: v. Create or improve pedestrian/cycle links with the surrounding area <u>to enable safe access from all adjacent residential areas</u> and demonstrate how this will be linked together as part of the planned improvements to Junction 9 of the M3 motorway any associated Park & Ride facility, <u>and the city centre and railway station. Within the site, if all areas are developed (43.48 hectares) there should be a target of at least 5.3 miles each of walking, and cycling / disability scooter infrastructure;</u>	Points noted. Recommended Response: Agree criteria v to be include additional wording but remove the word 'all' as this is too onerous and outside the scope of the site allocation: Disagree with the inclusion of the last sentence as this would not meet the planning tests.

		Create or improve pedestrian/cycle links with the surrounding area <u>to enable safe access to adjacent residential areas</u> and demonstrate how this will be linked together as part of the planned improvements to Junction 9 of the M3 motorway any associated Park & Ride facility:
ANON-KSAR-NKQN-9	<p>Suggest revised text for Policy W6: Where feasible and appropriate all proposals should seek to maximise opportunities this is too weak and will simply result in the next clauses being ignored by developers. It will be feasible and appropriate in all cases. Rephrase as:</p> <p><u>...In all cases, developers will be required to:</u></p> <p>(v) <u>contribute to the creation and improvement of pedestrian/cycle links with the surrounding area as required to deliver the Winchester Movement Strategy and City LCWIP, and demonstrate how this will be linked together as part of these links will also integrate with</u> the planned improvements to Junction 9 of the M3 motorway and any associated Park & Ride facility;</p> <p><u>(vi) provide infrastructure to encourage active travel by staff and customers/visitors;</u></p> <p>(vii) Create and/or improve recreation and green space opportunities...</p>	<p>Disagree – flexibility has been included in Policy W6 as it may not be possible, depending of the location of the planning application, to be able to require this. HCC Highways would be consulted and again it may not be possible/reasonable for a planning application to be specifically tied to the Winchester Movement Strategy/LCWIP. The suggested criteria vi would not meet the test as this would not be enforceable. A planning application in any event would need to submit a TA and these matters would be picked up in this document. Recommended Response: No change</p>
ANON-KSAR-NKEM-V	Too near motorway, congestion, noise, pollution	Points noted.

	Recommendations	Officer response
Comments from SA	None.	
Comments from HRA	None.	

Change paragraph 12.53 as follows:

~~National Highways were in the process of applying for a development consent order for improvements to Junction 9 of the M3 motorway. However, the Government has paused work on all smart motorway projects that were in their early stages, including the M3 Junction 9-14 project.~~

Planned improvements to Junction 9 of the M3 are the subject of a Development Consent Order. Part of these proposals include the creation and improvements include new cycle and pedestrian access to the South Downs National Park.

Add new paragraph between 12.54 and 12.55:

Any development or redevelopment site should be sensitive to its location adjacent to Winnall Moors which is part of the River Itchen SSSI and River Itchen SAC. Opportunities should be taken to incorporate measures to protect these sites from surface water run-off and creation of a green buffer to the designated site where possible.

Policy W6: Winnall

Within the Winnall area, as shown on the Policies Map, the council will continue to apply Policy E6 (retention of employment land and premises) with the expectation that it will remain as the main employment area in Winchester Town. Planning permission will be granted for proposals which are in accordance with the Development Plan and the approach for Winnall, as set out below:

- i. In sub area 1, which is the core employment area in Winnall focussed on Moorside Road, there is a presumption in favour of the retention of existing B use class employment uses and the creation of additional B2 (**General industry**) and B8 floorspace (**Storage and distribution**) to ensure this area continues as a centre for more traditional employment opportunities.
- ii. In sub area 2, along Easton Lane, ~~the council will adopt a more flexible approach in applying Policy E6 (retention of employment land and premises) and may permit B use class employment generating uses outside of the B2 and B8 Use~~

Classes. there is a presumption in favour of the retention of existing B uses classes and the creation of additional B2 and B8 floorspace to ensure that this area continues as a centre for more traditional employment opportunities.

Where feasible all new development including change of use will be required to:

- ~~▪ provide a range of flexible employment opportunities;~~
- provide tangible improvements to the public realm;
- provide an attractive, active frontage which addresses the street and avoids bland rear / side elevations onto Easton Lane; **and**
- provide a Travel Plan that demonstrates sustainable active travel that meets the requirement of the development for staff and commercial users to meet the requirements of the proposed development.
- ~~▪ if a new town centre use as defined by the NPPF is proposed, provide evidence to show that the use requires an out-of-centre location and that a 'sequential approach' has been applied to demonstrate that the use could not reasonably be accommodated in a more sequentially preferable location.~~

- iii. in sub area 3, the council will retain existing employment uses and encourage the sub-division and development of units to create provision for start-up businesses and small to medium enterprises (SMEs), **Uses within Class E (g) (ii) (research and development of production or processes) and E (g) (iii) (any industrial process which can be carried out in any residential area without detriment to the amenity of the area).**
- iv. in sub area 4 applications for uses outside of B2 and B8 uses will be considered against the requirements of Policy E6 (retention of employment land and premises), in the context of adjoining land uses.

Where feasible and appropriate all proposals should seek to maximise opportunities to:

- v. Create or improve pedestrian/cycle links with the surrounding area **to enable safe access to adjacent residential areas** and demonstrate how this will be linked together as part of the ~~planned~~ **National Significant Infrastructure** improvements to Junction 9 of the M3 motorway and any associated Park & Ride facility;
- vi. Create or improve recreation and greenspace opportunities in the area, including the provision of community and green infrastructure.

WIN11c: Winnall

Proposed use: Employment use



IIA Objective	Score
IIA1: climate change mitigation	Negligible (0)
IIA2: travel and air quality	Negligible (0)
IIA4: health and wellbeing	Negligible (0)
IIA7: services and facilities	Negligible (0)
IIA8: economy	Significant positive (++)
IIA9: biodiversity and geodiversity	Significant negative (--)
IIA10: landscape	Negligible uncertain (0?)
IIA11: historic environment	Negligible uncertain (0?)
IIA12: natural resources	Negligible (0)
IIA13: water resources	Negligible (0)
IIA14: flood risk	Negligible (0)

IIA objective 1: To minimise the District's contribution to climate change through a reduction of greenhouse gas emissions from all sources and facilitate the aim of carbon neutrality by 2031

Overall effect: Negligible (0)

Justification: The majority of the site is within an area where 20-30% of commuters to that area use public transport or active modes.

IIA objective 2: To reduce the need to travel by private vehicle in the District and improve air quality

Overall effect: Negligible (0)

Justification: The majority of the site is within an area where 20-30% of commuters to that area use public transport or active modes.

IIA objective 4: To improve public health and wellbeing and reduce health inequalities in the District

Overall effect: Negligible (0)

Score by criteria: 4a: Minor negative (-); 4b: Minor negative (-); 4c: Negligible (0); 4d: Major negative (--); 4e: Minor positive (+); 4f: Minor positive (+); 4g: Major positive (++)

Justification: The site is within 500m of an AQMA. The majority of it is within an area where noise levels at night from roads and railways are above 50 dB or the noise levels as recorded for the 16-hour period between 0700 – 2300 are above 55 dB. The site does not lie within a noise contour associated with Southampton Airport. It is within 400m of a wastewater treatment works or within 250m of a waste management facility **Not unless there is a waste management facility in Winall??**.

The site is within 401-800m of an NHS GP surgery. It is within 300m of open space, open country or registered common land. Less than 25% of the site contains open space, open country or registered common land, which could be lost to development. It is within 200m of a public right of way or cycle path.

IIA objective 7: To ensure essential services and facilities and jobs in the District are accessible

Overall effect: Negligible (0)

Justification: The majority of the site is within an area where 20-30% of commuters to that area use public transport or active modes.

IIA objective 8: To support the sustainable growth of the District's economy

Overall effect: Significant positive (++)

Justification: The site would provide employment within or adjacent to the settlement boundary of Winchester town.

IIA objective 9: To support the District's biodiversity and geodiversity

Overall effect: Significant negative (--)

Score by criteria: 9a: Minor negative (-); 9b: Minor negative (-); 9c: Major negative (--); 9d: Minor negative (-); 9e: Negligible (0)

Justification: The site is within a SSSI Impact Risk Zone for 'industry that could cause air pollution' or 'all planning applications'. It is within 500m of a locally designated wildlife site or ancient woodland. It is within a priority habitat. It is within 100m of a water course. The site does not intersect with a county or local geological site. IIA objective 10: To conserve and enhance the character and distinctiveness of the District's landscapes.

Overall effect: Negligible uncertain (0?)

Justification: The site has low overall landscape sensitivity.

IIA objective 11: To conserve and enhance the District's historic environment including its setting.

Overall effect: Negligible uncertain (0?)

Justification: The site is rated 'green' for risk of effects relating to historical constraints.

IIA objective 12: To support the efficient use of the District's resources, including land and minerals

Overall effect: Negligible (0)

Score by criteria: 12a: Major positive (++); 12b: Negligible (0); 12c: Negligible (0)

Justification: The majority of the site contains brownfield land. Less than 25% of the site is on Grade 3 agricultural land. Less than 25% of the site is within a Mineral Safeguarding Area.

IIA objective 13: To protect the quality and quantity of the District's water resource

Overall effect: Negligible (0)

Justification: The site does not fall within Source Protection Zone 1, 2 or 3, within a drinking water safeguard zone (groundwater), or within a drinking water safeguard zone (surface water).

IIA objective 14: To manage and reduce flood risk from all sources

Overall effect: Negligible (0)

Score by criteria: 14a: Negligible (0); 14b: Negligible (0)

Justification: Less than 25% of the site is within flood zone 2 or 3. Less than 25% of the site has a 1 in 100 year or 1 in 30 year risk of surface water flooding.