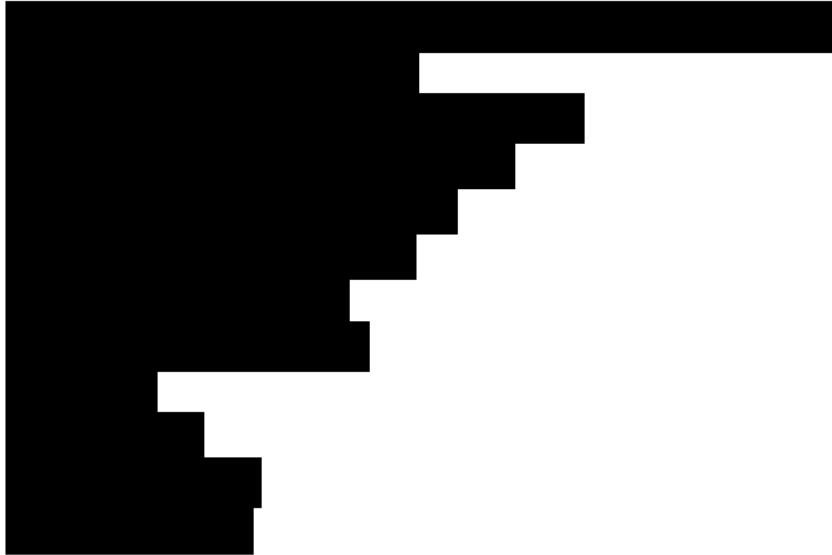


Save Bushfield Campaign response to Regulation 19 consultation

This representation is submitted by the **Save Bushfield Campaign**. We are a large group comprising:

List of the campaign members



Web site

<https://savebushfieldcamp.com/>

We have organised our response to the allocation in Policy W5 as follows:

1. Background and explanatory notes
2. Overall failure of soundness tests and conflict with national policy
3. Details of why W5 is unsound on matters of biodiversity and water issues
4. Details of why W5 is unsound on matters of landscape impact
5. Details of why W5 is unsound on allocated use
6. Details of why W5 is unsound on transport issues

Appendix: Planning History of the site

Note: references to the National Planning Policy Framework (NPPF) are to the December 2023 edition.

1 BACKGROUND AND EXPLANATORY NOTES

1.1 Undetermined planning application

The allocation site is the subject of an outline planning application (23/02507/OUT) which was submitted on 27 October 2023 and remains undetermined. This application, whilst for access only, is supported by a significant body of information and provides an indication of the ambitions that the landowner has for the type, quantum and scale of development on the site. This includes a hotel (100 bed, second largest in Winchester) Nursery, retail, restaurant, Leisure and education and student accommodation.

Our representations here have been informed in part by this information, which illustrates the damaging level of development that Policy W5 could facilitate.

It should be noted that we consider that this planning application conflicts with Policy WT3 of the adopted plan in a number of ways.

1.2 Masterplan

The application (23/02507/OUT) is supported by a **Concept** Masterplan which was adopted by Winchester City Council's Cabinet on 21st June 2023. Thus, we find the wording in Paragraphs 12.51 – 12.54, and Policy W5 itself, which refer to the criteria for preparing a masterplan as an exercise to be carried out in the future, to be confusing and inconsistent. We argue that this in itself makes the Policy unsound.

1.3 Inaccuracy

The Regulation 19 Local Plan contains a number of inaccuracies with regard to the allocation of Bushfield Camp. We recognise that these are not soundness failures, but they are misleading. For example:

The supporting text to Policy W5 at Paragraph 12.47 states:

“Bushfield Camp is an **existing mixed use allocation from the adopted Local Plan** that has been carried forward, updated as necessary.”

This is incorrect. In the adopted plan (WT3) the site is allocated as an **Employment Site**.

2 OVERALL FAILURE OF SOUNDNESS TESTS AND CONFLICT WITH NATIONAL POLICY

W5 is not justified. It fails the soundness tests on several counts and conflicts with other policies in the regulation 19 Plan. The Sustainability Appraisal does not support the allocation.

The allocation is not sound as it conflicts with other policies in the Reg19 Plan and with government policy in the NPPF

2.1 It is situated in open countryside and in the Winchester – Compton Street settlement gap as set out in **Policy NE7** of the Regulation 19 Plan. **Policy NE7** states, with regard to settlement gaps:

Within these areas only development that does not undermine the function of the gap and its intended role to define and retain the separate identity of settlements will be permitted. Any development should not threaten the generally open and undeveloped nature of the gap and avoid coalescence.

2.2 Later in this representation we explain how the allocation conflicts with other policies relating to biodiversity and the water environment (section 3) and impact on the landscape (section 4). We then explain, in section 5, that there is no justification for the allocation as there is no evidence to demonstrate the need for mixed use development on the site. Finally, section 6 sets out the transport and travel issues that make the allocation unsustainable and unlikely to be delivered.

2.3 The site was originally allocated for employment development in the Winchester District Local Plan Part I, which was adopted in 2013. Over the 11 years since the allocation was made there has been no attempt to develop the site. This suggests that when this allocation was made it was in fact not “effective” ie that it was not deliverable over the plan period. We will argue later in this submission (section 5) that the current allocation, **Policy W5**, also fails the soundness test c (effective) because there is no evidence to demonstrate that it can be delivered during the plan period.

The allocation fails to take account of the potential environmental, economic and social impacts of the allocation, as identified through Sustainability Appraisal

- 2.4 Sustainability Appraisal of the site is contained within the Integrated Impact Assessment -IIA at Appendix F, pages 1210-12 (Sire CS15). It only scores the site as positive on economy. In contrast it scores low on other measures including biodiversity: significant negative, landscape: negligible uncertain and travel & air quality: minor negative.
- 2.5 Policy W5 does not reflect the Reg19 Plan's sustainability objectives and there is no evidence that, should there be a need for the proposed employment space (which we do not accept), reasonable alternatives have been considered.

The site is not previously developed land

- 2.6 Notwithstanding the landowner's failure to develop the site, it has changed significantly in character since 2013. We will describe in sections 3, 4 and 5 of this submission that it **has and continues to be (is now)** an open part of the landscape which is rural in character and rich in biodiversity

The NPPF defines previously developed land as "Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. **This excludes:** land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and **land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape."**

The structures on the site are remains of the camp which have existed as remains since the mid 1970's, nearly 50 years.

The remains of the derelict structures on the site have existed as remains since the 1970's. Since the site was originally allocated in 2011, they have deteriorated further and have without doubt blended into their natural surroundings, so that they are now barely visible in the landscape.

On this basis we argue that this site can no longer be considered previously developed land and as such, having in mind its location in the countryside and within a settlement gap, should not be allocated for development of any sort

3 BIODIVERSITY, WATER AND THE ENVIRONMENT

SUMMARY OF OBJECTIONS ON THESE ISSUES

The allocation of Bushfield Camp at Policy W5 of the Reg 19 Plan is unsound because it is not justified as it conflicts with the following policies in the Reg 19 Plan:

NE1 Protecting and enhancing Biodiversity and the Natural Environment

NE5 Biodiversity

NE15 Special Trees, Important Hedgerows and Ancient Woodlands

NE17 Rivers and their Settings

It also conflicts with the following paragraphs of the NPPF:

NPPF paragraphs 180,185, 186, 187, 188, 189-194 (ground conditions and pollution)

And it is not consistent with findings in the Habitats Regulation Assessment that has been carried out to support the as yet undecided planning application on this site.

To overcome this failure and to ensure that the Plan is sound the allocation W5 should be removed from the plan.

DETAILED EXPLANATION OF THE OBJECTIONS

3..1 The site is not previously developed land.

Paragraph 5.63 of the Plan states that Bushfield Camp should be delivered by a landscape focused employment led development. However, in 2013 the site was allocated in the extant Local Plan and referred to as a 'partly brownfield site' in the inspector's report. Eleven years later the site has been untouched, returned to its natural state with flourishing biodiversity respected and appreciated by residents. Thus, as stated above (section 1d) the site can no longer be considered as previously developed land as defined in the glossary to the NPPF.

Soundness failure: Bushfield Camp has reverted to a valued greenfield site and its allocation for major development is not justified. It conflicts with paragraph 5.63 of the Reg19 Plan.

Remedy: Policy W5 should be removed as an allocated site.

3.2. Harm to SINC status /Biodiversity

There is a serious conflict between **Policy W5** which seeks to maximise the development potential of the site (as previously developed land), and the current status of the site which is a SINC and community space.

Bushfield Camp is a large chalk grassland site comprising 44 hectares of land to the south east of Whiteshute Lane, of which approximately 20 hectares was occupied until the 1970s by a WWII military camp. Although some concrete areas, roadways and structural remnants remain, it has now reverted to its natural state.

Over the past 50 years Bushfield Camp has been reclaimed by nature from a brownfield (previously developed) site into a relative wildlife haven supporting various priority habitats and a rich diversity of species. The site has even been designated a **Site of Importance for Nature Conservation (SINC)** and is home to protected species including Hazel Dormouse, Cinnabar moth, Spotted Flycatcher, Grizzled Skipper, Dingy Skipper, Small Heath, Red Kite, Bullfinch, Linnet, Song Thrush, Turtle Dove, Yellowhammer, Helleborine, Tor-Grass. Common Lizard, Slow Worm, Badger, Warblers, Fieldfare, Tawny and Little Owl, and

Woodpecker, Glowworm and 11 species of bat are also present at the site.

The allocation site is also a key link in the **Nature Recovery Network** as it provides connections between the surrounding landscape and other designated sites. Any large-scale development on this site is likely to put pressure on other nearby designated sites including the **River Itchen Site of Importance Scientific Interest (SSSI)** and **Special Area for Conservation (SAC)**, **St Catherines Hill SSSI** and **Whiteshute Ridge SINC**, which is the most immediate designated site. This further reinforces how much of a link in the ecological chain Bushfield is. The proposed allocation is likely to cause recreational disturbance to these sites and the conservation status of Annex 1 listed birds under the **Birds Directive (Nightjar and Woodlark)**.

The **Hampshire and Isle of Wight Wildlife Trust** has objected to the development proposed in the as yet undetermined outline planning application (see Section 1.1 above) on the grounds of “**direct loss of Bushfield Camp SINC, the loss of priority habitats and species, the fragmentation of the Nature Recovery Network and unmitigated recreational impacts on River Itchen SSSI/SAC and St Catherine’s Hill SSSI**”.

Natural England has stated that the development proposed in the outline application “**could have potential significant effects on River Itchen Special Area of Conservation**” and have required further information to determine the significance of these impacts and scope of mitigation, including a **Habitat Regulations Assessment**.

From February 2024, developments must result in a minimum of 10% biodiversity net gain. This will be very difficult to achieve on Bushfield Camp with the proposed scale of the mixed-use development and loss of chalk grassland that the outline planning application indicates would take place.

The Reg 19 plan aims to play a key role in moving the district towards Carbon Neutrality by 2030 and support the City Council’s strategy to avoid a Nature Emergency by creating a ‘greener district’. This commitment is embodied in **paragraph 7.14** of the plan, referring to the **Environment Act 2021**, which emphasises the importance of nature in the drive to tackle climate change. It sets clear statutory targets for the

recovery of the natural world in four priority areas: air quality, biodiversity, water and waste. It includes an important new target to reverse the decline in species abundance by the end of 2030.

Paragraph 7.41 of the Reg 19 plan goes on to state “Wildlife sites and habitats within this area and across the district that are of regional and national importance include 17 SSSIs, almost 600 Sites of Nature Conservation (SINCs) and 9 Local Nature Reserves (LNRs). These sites support important natural assets, such as ancient woodlands, grasslands and chalk rivers. These sites will be protected, with opportunities for enhancement encouraged”.

Paragraph 12.56 acknowledges that given the site’s sensitive location infrastructure requirements such as transport, access, open space, water and energy supply and drainage will need to be delivered in a timely manner, as part of planning conditions and the master plan process.

Bushfield Camp is in a sensitive location with the River Itchen to the east, which is designated for its biodiversity interest as a **Special Area of Conservation (SAC)**. **The Habitats Regulation Assessment identifies development at Bushfield Camp as having the potential to have a ‘significant effect’ on this SAC and other designated sites ‘in combination’.**

The allocation site is located within the **upper catchment of the River Itchen**. **Policy W5**, if adopted, would allow development which would have the potential to **impact upon the internationally protected site of the River Itchen SAC** and other sites in the wider Solent area in terms of nutrients (nitrates and phosphates) in wastewater produced by, for example, student accommodation, retail outlets, gym, sport centre and a 100-bedroom hotel. These uses are based on the aspirations in the current outline planning application.

NE1 (NPPF P180, P185, P186, P187) Protecting and enhancing Biodiversity and the Natural Environment in the District.

This policy sets a high bar of environmental protection as it states development will only be permitted where it demonstrates that it will protect and enhance the natural environment and biodiversity. It must avoid significant harm to the natural environment or adequately mitigate

any harm arising and clearly demonstrate there will be no adverse impact on the conservation status of key species, nationally protected designated sites, or locally designated sites and there will be no net loss or deterioration of a key habitat type including irreplaceable habitats and the integrity of linkages between designated sites and key habitats. Development must protect, conserve, and enhance ecology and the air and water environments in the district.

Policy W5 would allow a large-scale mixed development at Bushfield Camp. This would pose a significant threat to the biodiversity of the site. The outline planning application (23/02507/OUT) and Bushfield Camp Masterplan (2023) proposes replacing the area of grassland habitat that would be destroyed as part of the proposed development of the site and 'supporting' reptile species displaced by the construction site. An Environment Statement has acknowledged a 'residual, short-term, moderate' adverse impact on ecology. Winchester City Council's principal ecologist states that 'at present there are still a number of concerns which need to be addressed to show whether significant harm to biodiversity can be adequately mitigated and compensated for in accordance with (existing local plan) LPP1 Policy CP16. We contend that such an important site with potential for impact on the **River Itchen SAC** should not be put at risk in this way and is contrary to the draft local plan policy **NE1 and NPPF policies P180, P185, P186, P187.**

NE5 Biodiversity

Policy NE5 states that the new local plan is an opportunity to reflect new national requirements for biodiversity net gain in The Environment Act and also reflect the council's proactive approach to protecting, enhancing and restoring biodiversity across the district. **The policy states these sites will be protected, with opportunities for enhancement encouraged.** Allocation for major development is likely to have a significant effect on this site and these effects should be avoided or mitigated.

Important SAC sites close to Bushfield Camp are singled out within the local plan's **NE5** biodiversity policy: the **unique chalk grasslands and the internationally important River Itchen.** The allocation **W5** is included in the Regulation 19 plan without a robust strategy to mitigate for protecting, enhancing or restoring biodiversity. There would be a

significant harmful impact from a large scale 24/7 lit Bushfield Camp mixed development, as proposed in the Bushfield Camp Masterplan (www.Bushfieldcampregeneration.co.uk/masterplan/).

This includes a hotel, R&D offices, retail shops, gym and sport centre. Although open spaces to the north would be retained there would be a loss of existing habitats as the site is developed. New cycle and pedestrian routes proposed to connect the site would be lit at night to meet safety standards and would impact the dark skies that exist at present. In particular it would have a harmful impact on the South Downs National Park International Dark Sky Reserve (Sir Patrick Moore's Reserve). This status brings its own protections, including neighbouring areas.

The masterplan states that the developer will invest in green infrastructure and deliver a net gain in biodiversity. However, no details of how this could be achieved are provided. The landowner proposes to transform existing areas of open space to biodiverse and publicly accessible areas. The Eastern Field has no public access at present. The proposal is to retain the Drover's Field to the North as semi natural chalk downland and to leave the eastern meadow as calcareous grassland with new woodland. Biodiversity net gain – the principle that all development should leave nature in a better state than before, should have a positive impact. However, when read in conjunction with the already adopted Masterplan, **Policy W5** provides no certainty that net gain will be delivered. Thus, the Policy presents a serious risk that irreplaceable habitats and species, the grasslands, woodlands, hedgerows and watercourses that support so much nature will be lost.

Soundness failure: Policy W5 is not justified as it renders the Reg 19 Plan internally inconsistent. It conflicts with Policies NE1 and NE5 of the Plan. It is inconsistent with the supporting text in paragraphs 7.14, 7.41 and 12.56 of the Plan and it conflicts with national policies set out in paragraphs 180, 185, 186 and 187 of the NPPF.

Remedy: The allocation should be deleted.

3.3 Protected habitats

NE15 Special Trees, Important Hedgerows and Ancient Woodlands -

states that development which would result in the loss or deterioration of irreplaceable ancient woodlands, important hedgerows, special trees or distinctive ground flora and the space required to support them in the long term will only be permitted in exceptional circumstances. Development proposals must demonstrate that they have been informed by a full site survey and ecological survey.

The SINC status of the site on the old army camp area recognises the significant hedgerow and woodland habitat at Bushfield Camp. It is designated as such for its priority habitats - both chalk grassland and hedgerows.

The development proposed in the application 23/02507/OUT would include the felling of trees contravening **current local plan policy DM24**. Many of these trees are in public view and provide an essential habitat. Their loss would cause a detrimental impact on public amenity for a period of time until new trees are established. An arboricultural Impact Assessment is required to identify and protect any special trees or ancient woodlands.

NE17 (NPPF P 189) River and their Settings

Water plays an important role in the special qualities of the district and is important to biodiversity, flora and the landscape character. The River Itchen forms part of the Natura 2000 network of sites designated under the **Birds and Habitats Directives** which are also covered by the **Water Framework Directive (WFD)**. Chalk streams are a rare and valuable habitat. 85% of all chalk streams are found in England, mainly in the south with Hampshire's River Test, Itchen and Meon all filtered through chalk and nurturing a thriving ecosystem.

Any development at Bushfield Camp could impact on the watercourse of the **River Itchen SAC**. In response to the current outline planning application the Environment Agency requested a risk assessment and a thorough site investigation concerning contaminating activities around the previous military use that may have included fuel or other polluting chemical storage.

The **South Downs National Park Authority** and **Natural England** have requested further information on phosphate and nitrate mitigation as without these details the proposals could have a significant effect on the **River Itchen SSSI/SAC**. Paragraph 12.50 (page 332) of the Reg 19 Plan states that “The River Itchen to the east is designated for its biodiversity interest as a SAC. **The Habitats Regulation Assessment** identifies development at Bushfield Camp as having a ‘significant effect’ on this SAC and other designated sites in combination.

Soundness failure: Policy W5 is not justified as it is inconsistent with policies NE15 and NE17 of the plan. It fails to provide robust criteria to ensure that the existing hedgerow and woodland habitat is protected by any future development. It fails to satisfactorily address the risk posed to the River Itchen SAC.

Remedy: Without prejudice, should the allocation be retained in the Plan, the following criteria should be added to the policy:

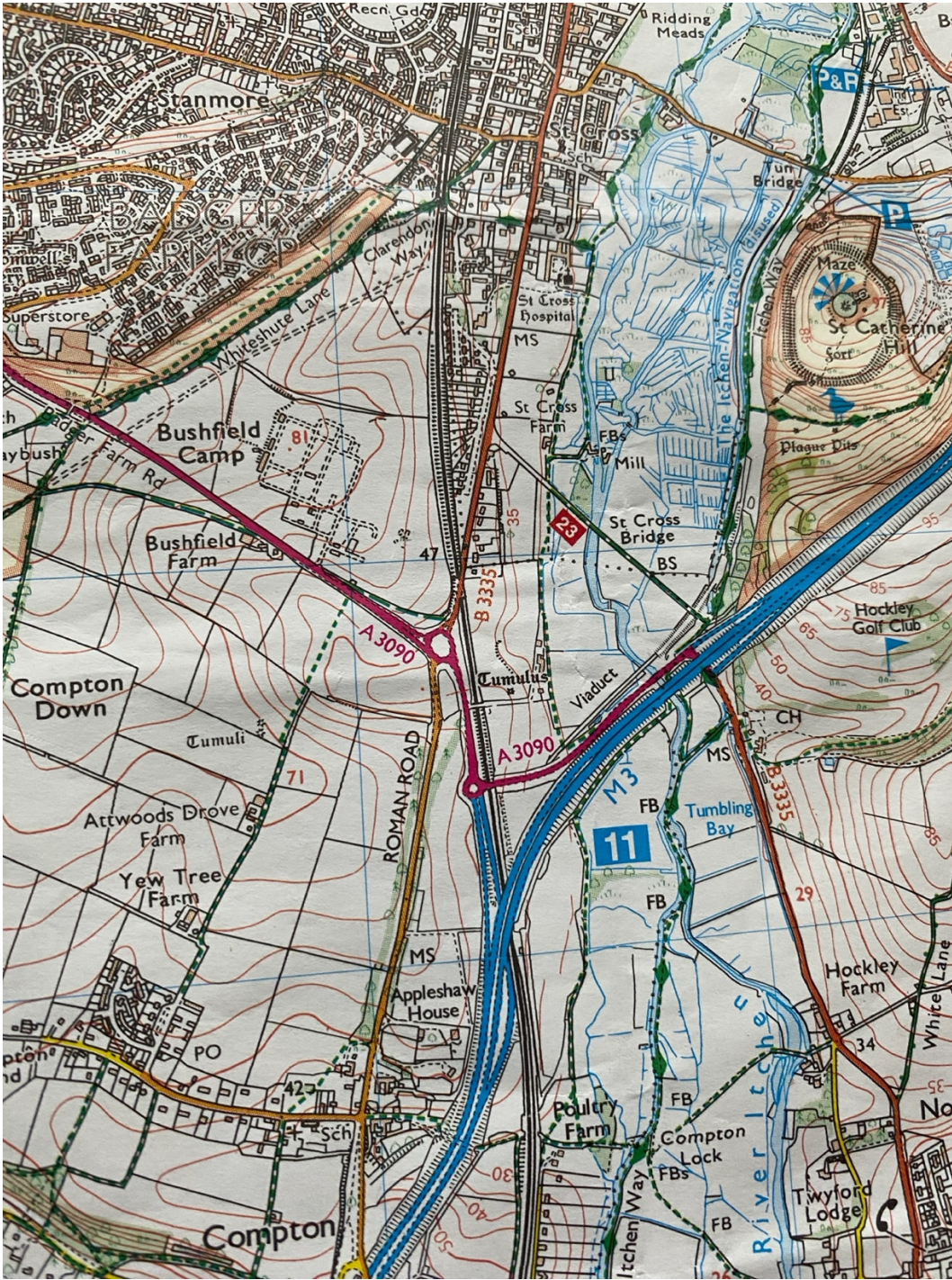
- 1. introduce a criterion to require an Arboricultural Impact Assessment.;**
- 2. strengthen criterion (xv) to require full details of a robust mitigation strategy to be in place before any planning permission is granted.**

4 LANDSCAPE IMPACT

The allocation of Bushfield Camp at Policy W5 of the Reg19 Plan is unsound because it is not justified. It conflicts with policies SP3, NE7, NE8, NE9, NE14 and W5(x) of the Plan and with Paragraph 180 of the NPPF.

To overcome this failure and to ensure that the Plan is sound the allocation W5 should be removed from the plan.

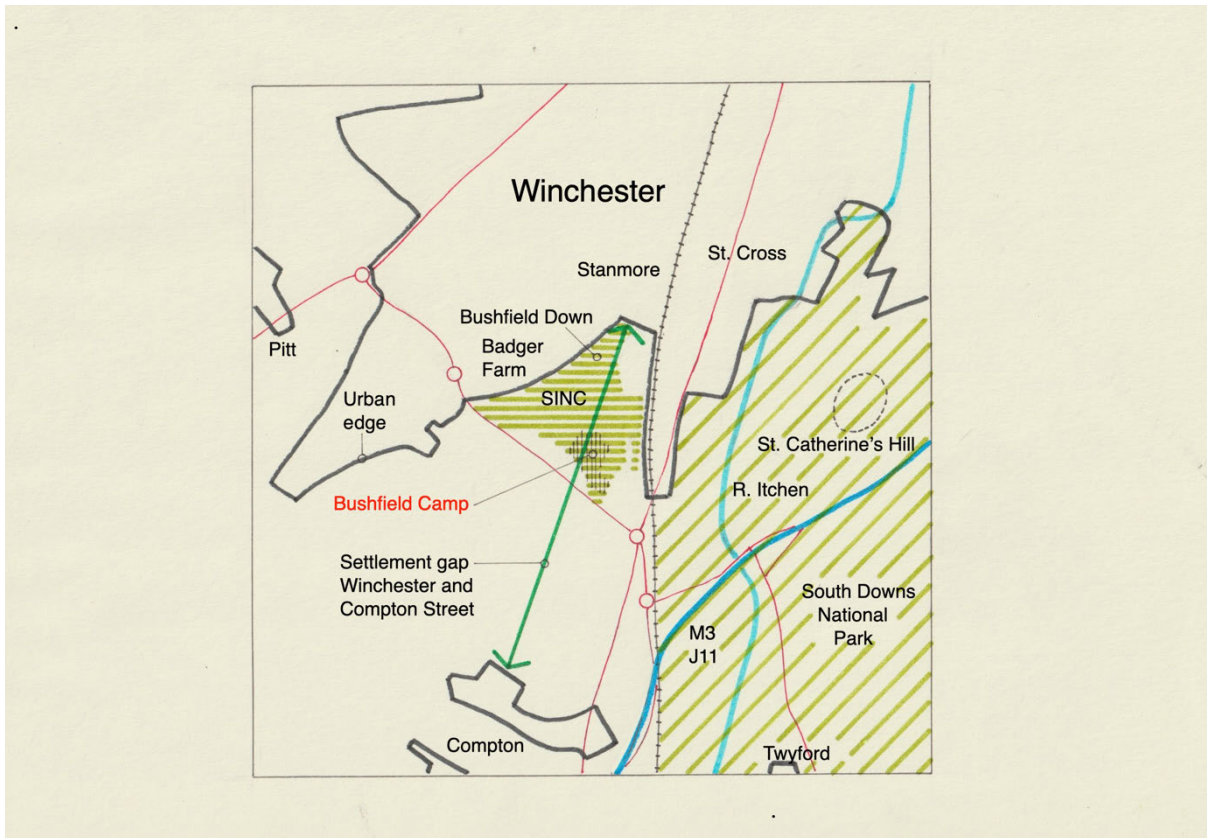
4.1 Location of Bushfield Camp in the landscape



Bushfield Camp is located on elevated land in a rural area of chalk downland and agricultural landscape south of Winchester, within a settlement gap. The parade ground of the Camp remains, surrounded by scrub.

The site is within an area of great landscape value and sensitivity that extends from the urban edge of Stanmore to the north, Oliver's Battery to the west,

the railway line and the **South Downs National Park** to the east and to Yew Hill and farmland south of Badger Farm Road to Compton (See Plan W5/ 1). The landscape character is a topography of open, rolling chalk downland.



PLAN W5/1

Bushfield Camp is part of the southern landscape setting for Winchester. The level of the parade ground is 81metres above OS datum (AOD). To the west on leaving Badger Farm and proceeding east down Badger Farm Road A3090, a wide and distant vista of rural chalk downland emerges, stretching towards Twyford and the South Downs National Park. To the east within the National Park is St Catherine's Hill, 97m AOD at the top, the site of an iron age fort. From the Hill are panoramic views of the City of Winchester, the Itchen River valley, 35m AOD, the medieval complex of St Cross Hospital, Bushfield Down to the north of Bushfield Camp and the downland countryside of the Camp site and farmland to the south towards Compton (See photograph W5/2).



PHOTOGRAPH W5/2 View of Bushfield Camp from St Catherine's Hill across the River Itchen valley

From its elevated site, a view of St Catherine's Hill in the South Downs National Park can be seen from the parade ground in Bushfield Camp, when looking east (see photograph W5/3)



PHOTOGRAPH W5/3 View of St Catherine's Hill looking east from Bushfield Camp

The routing of the M3, in the 1990's, through a deep chalk cutting east of St Catherine's Hill and the closure of the Winchester By-Pass at the base of the Hill on the west side, enabled the landscape and tranquillity between the Hill and the river valley to be restored. This is an area of exceptional landscape value.

4.2. Landscape studies

In 1998 Hampshire County Council published **Winchester City and its Setting** prepared by Landscape Design Associates. This report describes the landscape around the Bushfield Camp site and the importance of the landscape setting for the historic City:

5.5.27 Areas of influence within the Winchester Downs: bullet point 6: 'The open arable farmland within the 'vale' below the Compton Ridge, and extending north-eastwards across Badger Farm Road into Bushfield, forms a supportive landscape. The area is an important link between the distinctive

landscapes of Compton Ridge and the Whiteshute/Bushfield north areas. Its value lies in its openness which maintains the continuity of the 'green wedge' that penetrates the heart of the city from the south-west. The redundant character of the former army camp at Bushfield is very localised and does not significantly affect the broader impact and importance of the area'.

6.1. 'The historic, aesthetic, visual and nature conservation qualities of Winchester and its setting are exceptional. The city and its landscape display a continuity of human settlement, farming, trade commerce, culture, patronage stretching back to the Iron Age. This report has attempted to identify the synergy between many individual features that define Winchester and its setting. The rich characteristics, interest and value of townscapes and landscapes and their interrelationship produce the whole setting of the city, which is greater than the sum of its parts. This is the essence of Winchester.

6.10. 'The adjoining medieval suburb of St Cross, with its 17th and 18th century terraced houses, overlooks the River Itchen which frames the dramatic backdrop of St Catherine's Hill to the east Views from St Catherine's Hill over the river valley to St Cross, with a backdrop of the downland on Bushfield and at Whiteshute Ridge are dramatic and convey a remarkable sense of stability and continuity'.

6.13. 'The city sits on a platform raised above the river valley floodplain contained within a broad undulating chalk downland. The clarity of the landform provides a powerful setting for the city.

In 2002, the City Council published a **Landscape Character Assessment of the District**, prepared by Terra Firma, landscape architects. The Bushfield Camp site is within Character Area I – The Hursley Scarplands. Scarps Landscape Type are described – 'Throughout the chalkland, steep scarp slopes remain as unenclosed downland and woodland, due to their lack of opportunity for agriculture. These dramatic sculptural landforms often form prominent ridge lines and therefore have few roads and settlements associated with them. They do however provide popular viewpoints and include valuable ecological habitats such as unimproved chalk grassland and semi-natural ancient woodland.

Key Characteristics of Value and sensitivity:

- Important ecological habitats and SINC's (Site of Importance for Nature Conservation)
- Views from Bushfield (Down) uniquely feature the city's three major medieval building groups
- The chalk downland of Oliver's Battery, Badger Farm and Bushfield form an important backdrop to views of St Cross from St. Catherine's Hill
- Built form strategies
- Resist visually intrusive developments on elevated ridges, including large-scale farm structures and telecommunication masts."

In 2022 the City Council published a **Landscape Character Assessment Supplementary Planning Document** prepared by The Terra firma Consultancy Ltd. This SPD repeats (p 53) the description of the Character Area 1 – The Hursley Scarplands made in the 2002 report, and the Key Characteristics of Value and Sensitivities (p 105)

Chapter 5 of the 2022 Report: "The way forward: implementing the strategies states in the Introduction that 'The incorporation of the Winchester District Landscape Assessment's Key Characteristics, Landscape Strategies into the Winchester District Local Plan, and its proposed adoption as Supplementary Planning Guidance, should improve the ability of the planning system to protect and enhance the character of the District's landscape. In the summary of Landscape and Built Form Strategies, a key objective for visual intrusion is: Avoid siting buildings in the open land between settlements and at visible locations, such as the crest of hills. (p 249)"

4.3 **Policy W5 assessed against landscape related policies**

Strategic Policy SP3: Development in the Countryside

In the countryside, defined as land outside the settlement boundaries, the Local Planning Authority will only permit the following types of development.

i Development in accordance with Site Allocations set out in this Plan or any made Neighbourhood Plans; or

ii Development which has an operational need for a countryside location, such as agriculture, horticulture, forestry or outdoor recreation; or

Development proposals in accordance with this policy should not cause unacceptable harm to biodiversity and the water environment, to the character and landscape of the area or neighbouring uses, or create unacceptable noise/light and traffic generation.

Bushfield Camp is located in the countryside. The Site Allocation WT3 (para 2.7) for Employment Use made in the 2013 District Plan, was **not** supported by an examination of the impact that such an allocation would have on the landscape. No reference was made to the planning history (see Appendix) of a series of development proposals, following the vacation of the Camp by the Ministry of Defence in 1975-76, which were all rejected on the grounds that the only appropriate uses for the site of the Camp, were agriculture and recreation.

The Site Allocation WT3 was not informed by the landscape studies referred to in paras. 2.3,2.4.,3.1 and 3.2.

The reports by Roger Tym & Partners (para.2.5) and Vail Williams (para 2.6), made no reference to the impact that a 'Knowledge Park' would have on the landscape. At no stage has the operational need for this Employment Allocation for a countryside location been made, other than a site that was developed as a military camp to meet a national emergency (para 2.1) presented an opportunity for development in an area of high landscape value. Although the Employment Site Allocation WT3 has been carried forward, it is not an existing mixed use allocation as stated in paragraph 12.47 of the supporting text. The magnitude of development that **Policy W5** promotes, as demonstrated in the concept masterplan para.2.9, will cause unacceptable harm to the character and landscape of the area conflict with the last paragraph of **Policy SP3**.

Policy NE7: Settlement Gaps

*The local planning authority will retain the generally open and undeveloped nature of the following defined settlement gaps:
v. Winchester – Compton Street*

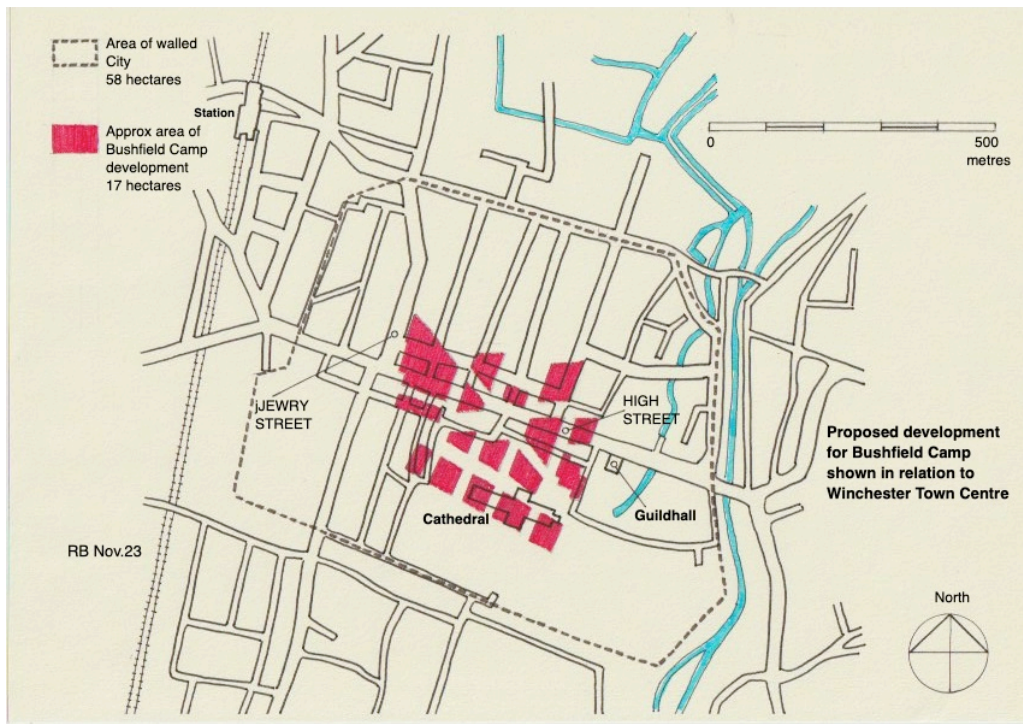
Within these areas only development that does not undermine the function of the gap and its intended role to define and retain the separate identity of settlements will be permitted. Any development should not threaten the generally open and undeveloped nature of the gap and avoid coalescence.

The Winchester to Compton Street settlement gap is in the Hursley Scarplands Character Area (para 3.2) and extends from the footbridge over the railway at Mead Road in the north, up Bushfield Down to a ridge line, then descends down to Badger Farm Road, before ascending up the ridge of Compton Down and then descending down to Compton in the south. Within the Gap are three farmsteads, Bushfield Farm, Attwoods Drove Farm and Yew Tree Farm.

The concept of a settlement gap is widely understood and appreciated. It controls the spread of development to enable settlements to retain separation and identity.

The three farmsteads in this gap have groups of buildings that are subservient to the landscape and do not visually detract from the open and undeveloped nature of the gap or undermine the function of the gap. The magnitude of development and activity that Policy W5 will generate, and demonstrated in the concept masterplan and outline planning application (para 2.9 and 2.10), in terms of floor area, uses and building heights, will far exceed the impact of a farmstead, and would threaten the open and undeveloped character of the gap (See Plan W5/3). The development proposed for Bushfield Camp would threaten the open and undeveloped character of the Winchester to Compton Street Settlement Gap. It should be resisted and the land in the gap should be managed to secure the long-term retention of its rural character.

PLAN W5/3 Area of proposed development for Bushfield Camp shown in relation to Winchester Town Centre



Policy NE8: South Downs National Park

Development in close proximity to the South Downs National Park will only be permitted where it would be in accordance with the statutory purposes and duty for National Parks as specified in the National Parks and Access to Countryside Act 1949, as amended by the Environment Act 1995 and where they conserve and enhance the intrinsic quality of dark night skies and the setting of the National Park.

Development proposals in close proximity to the South Downs National Park are expected to take account of the National Park assessments of landscape and tranquillity and demonstrate how a proposal conserves and enhances the special qualities of the Park.

Due to the topography of the Bushfield Camp site, built development would be visible from a wide area, including the South Downs National Park. The magnitude of development and activity that will be generated by Policy W5, and as demonstrated in the concept masterplan and outline planning application (para 2.9 and 2.10) indicates that on the elevated site of the Camp the emission of light at night and lack of tranquillity will not enhance the special qualities of the Park.

Policy NE9: Landscape Character

The Local Planning Authority will permit new development where it protects and enhances the district's distinctive landscape character as defined in the Landscape Character Assessment 2022.

Bushfield Camp is within the Hursley Scarplands Character Area (para 3.2), whose main characteristic is unenclosed open downland. As with the Settlement Gap Policy NE7, the magnitude of development that would be promoted by Policy W5 would not enhance this landscape character.

Policy NE14: Rural Character

Outside defined settlement boundaries, development proposals which accord with the Development Plan will be permitted where they do not have an unacceptable effect on the rural character of the area by means of visual intrusion, the introduction of incongruous features, the destruction of locally characteristic rural assets, or by impacts on the tranquillity of the environment.

NPPF paragraph 180 states:

Planning policies and decisions should contribute to and enhance the natural local environment by:

- h) Protecting and enhancing valued landscape, sites of biodiversity or geological value and soils; and

This site is in a rural location. The floor area and building heights proposed on an elevated site will be visually intrusive and have an impact on the tranquillity of the environment with the activity and movement that the development will generate.

4.4 Conclusion

Our assessment of the proposed mixed-use allocation made by Policy W5 is informed by the development proposals shown in the concept masterplan and the outline planning application. These documents

illustrate a scheme in plan area and building height that generates a major visual intrusion in the landscape.

For these reasons, the mixed-use allocation W5 for Bushfield Camp should be deleted from the Reg 19 Plan.

5 THE PROPOSED USE

Policy W5 is unsound because it is not justified.

The need for mixed use development as set out in the policy is not supported by clear evidence. There is insufficient local economic need for the development proposed in both qualitative and quantitative terms to override the objections that the location is unsustainable and the environmental impact of development so harmful. Furthermore, there is nothing in the Council's evidence base to demonstrate a need for an innovation/ employment hub and creative industries. Policy W5 fails to demonstrate that the uses on the site would not compete, detract or undermine Winchester Town Centre.

In addition, the allocation conflicts with other policies in the Reg19 Plan, notably **Policy SP3iii** which relates to development in the countryside.

To overcome this failure and to ensure that the Plan is sound the allocation W5 should be removed from the plan.

Qualitative Need

The **Employment and Town Centre Uses Study (2024)** (ETCUS) states:

- “Winchester has a diverse economy with sectoral strengths in retail, health, professional, scientific and technical, education and business administration and support services.” (0.3.1)
- “The employment rate in Winchester is consistently higher than England up to 2019. However, it rose to above the national level average again. (3.5.11)
- “Average earnings in Winchester are above the England and Hampshire averages.” (3.5.18)

- “Winchester has considerably more commuting inflow with 11,318 more workers than residing there.” (3.5.23)

Winchester does not need largescale additional employment allocations outside the town in order, for example, to:

- provide jobs for a significant or growing number of unemployed persons;
- diversify the local economy to address a reduction in a particular economic sector; or
- continue a supply of employment land to enable a growing resident workforce to work locally rather than having to commute out of the town to find employment.

To the contrary, the significant increase in working from home in Winchester brings with it the major benefit of securing more employment and reversing out-commuting without the need for additional employment land allocations.

Quantitative Need

In its response to comments on **Policy E1** (Creating a Vibrant Economy) of the S.19 local plan the Council states in para.10.18:

“The ETCUS study (**Employment and Town Centre Uses Study 2024**) included a range of needs for offices (use class Egi) and employment land (use classes B2 and B8). The lower and upper ranges identified in ETCUS included 3.3 hectares and 12.2 hectares of land for office development respectively though some scenarios identified the need as high as 17.5 hectares”.

“...the estimated amount of office land which will be delivered from the sites identified....is about 17 hectares.”

This estimate of “supply” omits Station Approach which was previously estimated to provide 2.1 hectares

The 4 forecasts of the additional amount of office employment land needed within the plan period are:

Cambridge Econometrics (CE) forecast	10.5 hectares
Oxford Economics (CE) forecast	12.6 hectares
Experian (Ex) forecast	13.6 hectares
Based on past completions	3.3 hectares.

Excluding the 11.8 hectares of employment land identified in **Policy W5** (Bushfield Camp) from the 17 hectares of supply (which excludes 2.1 hectares at Station Approach - policy **Win 8** and table 55 in ETCUS) would leave a supply of 5.2 hectares.

This is sufficient to meet the forecast need based on past completions.

Furthermore, the top three forecasts above include an allowance of 0.9 ha. for “flexibility” or unforeseen land needs and 6.3 ha. for office space lost to residential under changed regulations on permitted development which is significant and represents about half of the forecast need for office employment need.

It is unsustainable that 11.8 hectares of land at Bushfield Camp - which lies outside the town - is required to replace 6.3 hectares of office employment land which is being lost through permitted development, primarily to residential use, in the town centre.

If the allowance of 6.3 hectares in the forecasts to replace offices lost to residential use under permitted development were excluded, then the supply – even without **policy W5** - still exceeds CE past completions forecasts but is marginally less than the OE and Ex forecasts.

Any forecast need for office employment space should be provided in sustainable locations. Policy W5 does not reflect the Reg19 Plan’s sustainability objectives. Furthermore, even if there is a need for the proposed employment space (which we do not accept), reasonable alternatives have not been considered through the Sustainability Appraisal.

Policy W5 is internally contradictory

Criterion iv of **Policy W5** states: *the proposals demonstrate that the uses on the site would not compete, detract or undermine Winchester Town Centre.*”

Policy W5 refers to *“an allocation for a mixed use, flexible business and employment space, an innovation/education hub and creative industries provided that....”*

Any development granted planning permission under this policy would have to state how much floorspace is to be provided within each use class. Phases such as “flexible, employment space and innovation hub do not refer to use classes.

It is assumed that **policy W5** refers to office uses and not manufacturing (Class B2) or warehousing (Class B8). Offices are covered by:

“Use Class E Commercial, business and services

E (g) (i) an office to carry out any operational or administrative function.

E (g) (ii) Research and Development

Education uses are covered by:

F 1. learning and non-residential institutions for education.

Policy W5 does not include a floorspace figure, but the Council’s response to consultation on the S.18 local plan refers to 11.8 hectares of employment land. It is assumed that the rest of the 20-hectare allocation includes non-employment uses such as education, hotel, car parking etc. These uses are proposed in the as yet undetermined outline planning application for mixed use development on the allocation site.

As an illustration of how much office floorspace (Classes E (g) (i) and (ii)) 11.8 hectares of employment land could support, the outline planning application refers to 60,684 square metres, or 653,200 square feet.

Following the pandemic and the trend for working from home, the use of land in sustainable locations in Winchester town centre for employment and regeneration, such as the allocations in **policies W8 Station Approach and W7 Central Area**, should be developed first, before any consideration is given to developing sites for employment outside Winchester Town Centre. Additional employment in Winchester Town Centre would contribute to the vitality of the local economy by bringing additional trade to shops, cafes/restaurants /pubs and hotels.

Furthermore **paragraph 9 of the NPPF** states that:

“Planning policies and decisions should play an active role in guiding developments towards sustainable solutions, but in doing so take local circumstances into account, to reflect the character, needs and opportunities.”

Winchester Town Centre is well served by public transport to provide a sustainable solution for serving additional employment, in contrast to the location and lack of public transport connections at Bushfield Camp. This is responded to in greater depth in the section on Traffic and Transport.

It is inconceivable that a development of approximately 650,000 square feet of offices on Bushfield Camp, with the attractions of: ready access to the motorway, on-site parking, support facilities and a single ownership would not out-compete town centre sites with complex ownership and site constraints.

Conclusion

Policy W5 (Bushfield Camp) of the S.19 local plan is unsound because it is not justified by clear evidence. There is no case for the economic need for the site, both in qualitative and quantitative terms, and it fails to demonstrate that the uses on the site would not compete, detract or undermine Winchester Town Centre.

For these reasons and to ensure that the Plan is sound Policy W5 should be removed from the Plan.

6 TRAFFIC AND TRANSPORT

Policy W5 is unsound. It is not effective because it does not provide clear requirements to ensure that development would be consistent with the Council's **Carbon Neutrality Action Plan's** target of net zero greenhouse gas emissions by 2030. It would conflict with **Policy CN1** of the Reg19 Plan and with national policy in paragraph 11a and para 159 (previously 158) of the NPPF.

This allocation is not consistent with national policy, notably **paragraph 108 (was 110) (b) of the NPPF**, as there is no evidence that it has been prepared with the active involvement of the highways authority or neighbouring council/s.

Sections iv and v of Policy W5 are so vague that they risk transport emissions that would undermine the Council's **Carbon Neutrality Action Plan's** target of net greenhouse gas emissions by 2030.

Policy CN1 states:

*“The plan will help to meet the targets in the council’s **Climate Emergency Declaration** and reduce the district’s carbon footprint by supporting the re-use and refurbishment of existing buildings where possible and ensuring that new development is designed in a way that adapts to challenges of climate change in a positive, comprehensive and integrated way”*

References in **Policy W5 v** to the **Winchester Movement Strategy** and **Local Cycling and Walking Infrastructure Plan (LCWIP)** are misleading since clear proposals have not been decided or published for either. Discussions so far on the **Winchester Movement Strategy** have not included specific references to Bushfield, so **Winchester Movement Strategy** in its current unfinished form provides no guidance for this site. No timetable has been given for consultation on final proposals for the **Winchester Movement Strategy**. The **LCWIP** for Winchester Town has been withdrawn by Hampshire County Council, and the published **LCWIP** for the district outside Winchester Town is still tentative and minimal.

Otherwise, there is insufficient detail to be effective. It is not sufficient to suggest enabling sustainable travel connections [without specifying the extend, density and design standard](#) of such connections.

The policy does not preclude nominal poorly designed walking and cycling infrastructure and a poor bus service. These would attract little use and do little to prevent a growth in motorised transport emissions.

Policy W5 vi lacks a definition on the maximum impact the development should have on the road network. It focusses on process and says little about outcome:

The only outcome required here is worded, ambiguously, as ‘impacts on the road network acceptable to the highways authorities.’ This target is not specific, measurable or appropriate. There are more policy issues here than acceptability to the highway authorities. It fails to require additional transport emissions arising as a result of this development to be below the level that would undermine the council’s overall emissions reduction target for the district of net zero by 2030.

The allocation is for 'a flexible business and employment space, an innovation/ education hub and site for creative industries' located at the edge of town. It is remotely situated from other activity areas and public transport facilities, and as such will pose major difficulties for keeping its transport emissions low enough. It will require far more imagination, guidance and care than is shown in the Regulation 19 Plan. It is difficult to see how such a development will avoid excessive additional transport emissions in a district where transport emissions are already unsustainably high. Locating the proposed activities elsewhere in Winchester Town would present fewer problems.

The outline planning application (23/02507/OUT) demonstrates the damaging transport impact that the allocation in Policy W5 would have. The developer's calculations estimate that an additional 4,542 car journeys per day would be generated. Roads around the development were estimated to experience an increase in traffic of between 17 to 37%. Using government conversion factors, we calculate that the modelled increase in traffic would produce 6.15 KtCO₂e extra emissions annually.

To achieve net zero emissions by 2030 in the district there will have to be cumulative reductions of 67 KtCO₂e in transport emissions each year until 2030. There is clearly no headroom in overall transport emissions to accommodate an increase in transport emissions that this allocation would generate, as illustrated by the outline planning application. This would make a sharp reduction necessary across the district even more unachievable. So far, neither **National Highways** nor **Hampshire County Council** have agreed to the development proposed in the outline planning application, which we contend demonstrates the level of development which Policy W5 would facilitate.

Conclusion

There are fundamental transport emission challenges in locating economic development at a site like Bushfield, on the edge of town. Modelling so far has demonstrated the likelihood of excessive traffic growth.

Neither the site-specific policies for W5, nor the general policies for the Reg 19 Local Plan contain proposals that will prevent the undermining of policy CN1.

The proposed policy W5 is therefore unsound as it does not ensure that transport emissions at the Bushfield site will be containable below a level compatible with the Council's **Carbon Neutrality Action Plan** and **Policy CN1**.

Appendix

Planning History

In 1939 the War office requisitioned agricultural land south of Bushfield Down from the Ecclesiastical Commissioners (to become the Church Commissioners in 1948) to establish a military camp. It remained in use by the Ministry of Defence until it was abandoned in 1975-76, when most of the Camp buildings were demolished. In 1979 the site was returned to the Church Commissioners.

In the 1960's and 1970's a range of development proposals, including residential, industrial and a superstore were made to the City and County local planning authorities. They were all rejected on the grounds that the only appropriate uses for the site of the camp were agriculture and recreation.

In 1995 the City Council in preparation for the 1998 Winchester District Plan produced the Bushfield Camp Study, which concluded that only recreation related uses would be appropriate for the site. The inspector for the inquiry into the Plan agreed with the Study and said that the site forms part of a wider area of countryside.

In 2005, prior to the Winchester District Plan 2006, the Council as part of its Biodiversity Action Plan, produced a consultation brief on Bushfield Down and Bushfield Camp. This recognised the significance of this area of chalk downland.

In 2009 a report for the Church Commissioners prepared by Roger Tym & Partners and Drivers Jonas LLP promoted Bushfield Camp as a 'Knowledge Park', comprising a hybrid science and business park.

In 2009 Winchester City Council instructed Vail Williams, commercial property estate agent in Southampton, to carry out an evaluation and viability study for the development of a knowledge park at Bushfield Camp. In this study no consideration was given to the impact that development would have on the landscape. This led to the Council including in the 2013 Winchester District Plan, proposal WT3 for a 20 hectare 'opportunity site' at Bushfield Camp. The proposal was modified

by the Inspector, who recommended allocating the land for Employment, a recommendation that the Council adopted.

South Downs National Park designated on 1 April 2011

2013 Winchester District Plan made a site allocation WT3 for 20 hectares of land at Bushfield Camp for Employment Use.

On 21 June 2023, the City Council Cabinet approved a report to support a concept masterplan for Bushfield Camp, prepared by the developer, to inform the development management assessment of a subsequent outline planning application.

In October 2023 the Church Commissioners submitted an outline planning application ref: 23/02507/OUT to develop Bushfield Camp for mixed use flexible business and employment uses occupying 96,000 sq. metres of floorspace, arranged in 2,3 and 4 storey buildings, 1055 parking spaces for 3,300 employees The application received 849 comments of objection and 11 comments of support. The application remains to be determined.