

12 October 2024

Planning Policy
Winchester City Council
City Offices
Colebrook Street
Winchester
SO23 9LJ

Dear Sirs,

Winchester District Local Plan 2020-2040 – Reg 19 Consultation

We write on behalf of the Geoghegan Group to provide comments on the above Local Plan Reg 19 consultation.

While we note that the plan is broadly positively prepared and supports the development of improved services and facilities within the district over the life of the Local Plan, and support the overall approach, we have some concerns over detailed drafting of the policies set out in our statement below and hence have raised these as objections to the relevant policies where we consider that certain changes would be beneficial in improving the form and function of the policies proposed.

We have in each case set out the change proposed that we believe is needed to improve the function of the plan. We consider that these changes are necessary to make the Local Plan effective, justified and sound in accordance with the relevant tests.

Vision and Objectives

While the Local Plan sets out a Vision and Objectives for development within the Plan period, and focuses on climate change, housing and the economy, it makes no express reference to the enhancement of healthcare and other essential social infrastructure that supports communities. There is a growing need for investment in public and private healthcare infrastructure to support a healthy community and provide for well balanced places with access to a full range of services.

While the LP objectives recognise the County Town of Winchester will continue to be the cultural and economic centre of the district with a significant range of services, facilities and employment, and as such will be a centre for growth, it makes no reference to its role in supporting the health and well-being of the community.

While the LP seeks to promote health by improving air quality, increasing opportunities for walking and cycling and enhancing access to outdoor recreation and the natural environment and by delivering inclusive communities with a range of services and infrastructure in sustainable neighbourhoods, including community infrastructure, it does not expressly recognise the need for additional healthcare investment in the vision, objectives of policies of the proposed Plan. We feel that this is an important omission that should be addressed with a specific objective and policy that:

'Enhancing the health and well-being of the community by supporting investment in the healthcare infrastructure of the area, including within Winchester as the principal settlement within the borough.'

Policy SP1

While we support the overall thrust of Policy SP1, we are concerned that as currently worded, this does not appear to set out a clear commitment to achieving sustainable development as required by the NPPF and does not commit to meeting the needs of the area. Paragraph 11 of the NPPF requires all plans to promote sustainable development that meets the development needs of the area, aligns growth and infrastructure and improves the environment and tackles climate change. We feel that the policy should be amended to reflect this commitment:

'The Local Plan supports sustainable development and aims to meet the needs of the area in terms of housing, economy and services/infrastructure while improving the environment and tackling climate change'

Policy SP2

Policy SP2 sets out the Strategic Vision for the area and commits to a specific level of housing and economic growth. We feel that the policy should however, also reference the infrastructure needs of the area and make specific reference to the need to invest in healthcare and other social infrastructure to support the needs of the communities.

As noted in relation to the vision and objectives, while the LP seeks to promote health by improving air quality, increasing opportunities for walking and cycling and enhancing access to outdoor recreation and the natural environment and by delivering inclusive communities with a range of services and infrastructure in sustainable neighbourhoods, including community infrastructure, it does not expressly recognise the need for additional healthcare investment in the vision, objectives of policies of the proposed Plan. At present, SP2 only references the health and well-being of the new residential communities and does not recognise the ongoing and future need for investment in social infrastructure to ensure that this is able to adapt to meet the challenges of the future. It is the case that health needs are changing and that existing services and facilities will need to be enhanced, supplemented and adapt to meet the needs of the community over the life of the Plan. We feel that this is an important omission that should be addressed with a specific policy objective that:

*'The council will support the delivery of new housing, economic growth, **development and** diversification, as appropriate for each of the three spatial areas, through the following development strategy:*

*i. Winchester Town will make provision for about 5,640 new homes through a range of accommodation, including the completion of the Kings Barton development and the redevelopment of Sir John Moore Barracks, to meet the needs of the whole community and to ensure that the local economy **and services develop further their** existing and growing strengths in higher education, creative and media industries, **healthcare** and other knowledge-based activities, whilst respecting the town's special heritage and setting.'*

Suggested additions above are highlighted in bold.

The policy should also include a commitment to:

'Enhancing the health and well being of the community by supporting investment in the healthcare and social infrastructure of the area, including within the urban area of Winchester as the principal settlement within the borough.'

Policy D6

While we support the intention of Policy D6 which seeks to prioritise the redevelopment of previously developed, brownfield land, we would raise concern that the policy as currently drafted may not be effective and is inconsistent with national planning policy and is hence unsound. While the thrust of the policy is supported, in the final sentence the policy seems to restrict the optimal use of brownfield land in the urban area to match the characteristics (including potentially the density) of the surrounding land. This is inconsistent with an approach that seeks to increase densities to accommodate the development needs of the area and is likely to consequently increase the need for previously undeveloped land.

The policy ought to maximise the use of land as a valuable resource by prioritising the development of brownfield land, making best and most efficient use of available land, as set out in the LP Vision.

We would suggest that to clarify the approach, the phrase *'The primary determinant of the acceptability of a scheme will be how well the design responds to the general character and local distinctiveness of the area in which it is located.'* Should be deleted.

Policy HE5

We support the general thrust and structure of policies HE1-HE4 of the Plan as proposed, which adopt a hierarchy of control that reflects the relative importance of heritage assets and broadly reflect that set out within the NPPF. We have concerns however, that policy HE5 as proposed, does not reflect the balanced approach set out in national policy and applies the same level of control to both designated heritage assets (irrespective of their status) and to non designated heritage assets. The latter may be of limited or local importance and may appropriately be recorded prior to development progressing. It is inappropriate therefore, to say within the policy that:

'The local planning authority will not permit the loss of the whole or part of a heritage asset without being satisfied that the harm is unavoidable....'

This sentence should be deleted. As the policy is actually about securing appropriate mitigation, the approach to the consent of development should be left to policies HE1-HE4 and the approach to securing appropriate mitigation should be dealt with in this policy.

Vision for Winchester

While we support the vision for Winchester on page 80, this should also refer to the enhancement of healthcare and other social infrastructure within the urban area of the City.

There is a continuing need to renew and replace the healthcare and other social infrastructure of the district to meet the needs of the existing and growing population and reflect changes and improvements in the standards and delivery of health services. This is a fundamental part of sustainable development and increasing social equity and healthy lifestyles. At present the focus is predominantly on housing and employment and social infrastructure is neglected.

In the absence of this, the statement does not reflect the rounded needs of the district and is unsound and ineffective.

Paragraph 5.45

The paragraph should advise that while it is expected that new buildings should be of a scale which is sympathetic to others in the surrounding area, they should also seek to optimise density and the efficient use of land within the urban area.

In the absence of this, the statement is at odds with the NPPF and is unsound.

Policy D2

Policy D2 lacks a positive commitment to the development needs of the area and the focus of the LP examination on policies which are prescribed in the consultation pro-forma, does not allow for comments and objections to the visions which the policies reference. The consultation does not therefore, allow for comments on substantive issues that policies rely on but which are not reflected in the policies themselves.

It also sets out a range of considerations some of which will be relevant only to a limited set of proposals depending on whether they lie within the areas noted in the individual criteria. The preamble to the policy should therefore, include a positive commitment to the development and growth of Winchester as the primary town and also prior to the criteria listed contain the phrase '*where appropriate to the development proposed*'.

Policy H6

Policy H6 sets the overall approach to affordable housing within the area. We cannot see a definition however, of the proposals to which the policy applies and this should be clarified as applying to all relevant proposals for housing within Class C3 of the TCP Use Classes Order.

Policy E1

While recognising the contribution to the local economy of employment opportunities outside of traditional industrial use classes, it fails to reference education, healthcare and other service sectors which are significant sources of investment in the local economy and employment and should be recognised in the wording of the policy.

Policy E5

Given that policy E1 recognises the employment value and value to the economy of activities outside the traditional employment use classes, this should also be reflected in policy E5 to provide support for development outside of the traditional use classes that benefits the local economy and employment and skills, including in healthcare and other social infrastructure.

Policy E8

Policy E8 refers to proposals for the development of new, extended or improved facilities and services and notes that these will be supported in accordance with policies SP1 and SP2 of the Plan (though we separately note in relation to those policies that neither refer to new investment in healthcare or social infrastructure). The policy should also refer to support for new, improved, extended or **replacement** services and facilities.

While the policy is not clear on the definition of a local function, it seeks to suggest non-local functions should be located in the town centres with reference to Policy E3. Policy E3 however, refers to the main town centre uses that drive footfall and vibrancy. This is not inclusive of local services, such as some healthcare and other social services that are not primarily serving visiting members of the public where high levels of accessibility are required. Within the town centres, the main town centre uses of retail, office, indoor leisure uses, are supported by Policy E3, along with similar uses that are aimed primarily at visiting members of the public and add to the vibrancy and attractiveness of centres.

Hence Policy E8 should be amended to restrict only non-local services that are primarily for large number of visiting members of the public to town centres. It should be amended to read

'.... Within settlements, facilities and services that serve visiting members of the public where high levels of accessibility are required and do not serve a local function should be located within the centres in accordance with Strategic Policy E3 above. Other services that do not require high levels of accessibility should be located within the main urban areas....'


Winchester Local Plan

While the policy seek to resist the loss of sites used for local services to other non-service uses, the policy should make clear that the reuse of buildings or sites, including redevelopment where appropriate, that have previously been used for services for other local services is supported.

We would be pleased to discuss the above comments with you as the plan progresses.

Kind regards.

Yours sincerely

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Director