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**Chairman: Keith Leaman**



## **Winchester District Regulation 19 draft Local Plan Consultation**

Response by the City of Winchester Trust  
October 2024

By submitting this response we acknowledge that; a) our response, together with supporting information, which includes our organisation's name, address and contact details will be sent to the Local Plan Examination Programme Officer and the Planning Inspectorate; and b) our name will be published, together with our response, in the Winchester City Council Local Plan Examination website.

The Trust acknowledges and is grateful that Winchester City Council has amended the Local Plan in response to some of the comments and objections made by the Trust on the Regulation 18 draft plan. However, in the objections set out below we contend that the current draft of the plan is unsound on the grounds either of being unjustified or ineffective and in some instances not consistent with the draft National Planning Policy Framework 2024 (NPPF).

### **Strategic Policy D1 High Quality well designed and inclusive places**

#### **Objection and Comments**

This policy is wide ranging and embraces many different factors that contribute to good design and is improved by the amendments following the consultation on the Regulation 18 Plan. There is though one aspect that is missing which is related to the word 'inclusive' in the heading of this policy.

The word 'community' and the importance in creating a sense of this within a development is missing from the policy which most housing estates fail to make any effort to embrace. A well-integrated community helps to reduce petty crime and anti-social behaviour and makes for a development which engenders a sense of pride in its residents.

An example of a development with a good sense of community was experienced by the Trust's team of judges adjudicating the City of Winchester Trust's 2024/25 Design Awards. When they visited the recent development at Lovedon Fields on the boundary of Kings Worthy, they saw a well-integrated community enjoyed by the residents with its sense of enclosure that has encouraged community interaction across the common areas.

A clause along the following lines could be added to the policy:

"The layout and design of new housing, particularly for larger developments, should encourage community interaction, that provide places to live in favour of pedestrians and create a safe and sociable environment".

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## **Strategic Policy D2 Design Principles for Winchester Town**

### **Objections and Comments**

In the Trust's response to this policy in the consultation on the Regulation 18 plan we asked for amendments to paragraph ii. to include the possibility of a spatial plan for Winchester Town being prepared which the Trust has promoted over many years. The City Council agreed to additions to the planning documents that could be prepared without specific reference to a spatial plan for the whole town.

The need for a spatial plan for the Town has become more urgent given the several significant development sites in and around the Town which are indicated in the work arising out of the Winchester Design workshop illustrating the areas of opportunity referred to in the supporting text in paragraphs 5.52 – 5.61. There has been a history of abandoned attempts to progress development with both the Central Winchester Regeneration Area and the Station Approach area. A spatial plan for the town would help to progress those and other sites and enable their impact on each other and the whole Town to be considered and is more likely to lead to developments that are generally successful and welcomed.

Fundamental to the success of the development sites and the whole Town is how movement is planned. There are references to the Winchester Movement Strategy in this policy and elsewhere in the Local Plan, but this is lacking in content at the moment and just has the overall aim of reducing traffic. A spatial plan would help to accelerate the development of the Movement Strategy in a long-term visionary way, and this would be in line with the approach taken in the revised paragraph 112 in the 2024 draft of the NPPF.

The Local Plan should include a positive reference to the benefits of a spatial plan for the Town. Something along the lines of the following is offered for inclusion in the Plan:

"There is an opportunity to bring together all the evaluative and creative design work which has taken place and will continue to take place under one umbrella, in the form of a spatial plan for Winchester Town. This would include the key outputs of the Winchester Town Vision, develop further the findings from the Winchester Design Workshop (including the Areas of Opportunity), include long-term proposals in the Winchester Movement Strategy including the Winchester Local Cycling and Walking Plan, Local Area Design Codes and the Development Allocations for Winchester. (Policies W1 – W11). The production of a spatial plan for Winchester Town would include community and stakeholder engagement and would be a flexible spatial plan providing an urban design framework to assist the evaluation of proposals and initiatives as they come forward over the plan period".

## **Policy HE4 Non-Designated Heritage Assets**

### **Objections and Comments**

In the Regulation 18 consultation the Trust objected to the absence in Policy HE4 of any reference to the possibility of the local authority providing a local list of non-designated heritage assets. The Trust has, for many years, sought such a list (see City of Winchester Trust's 2018 A Vision for Winchester').

The adopted Local Plan (LPP2) refers in supporting text 6.4.105 – 109 and in Policy DM31 the value of a local list and its possible preparation in the future. The Trust would like to see a similar wording included in Policy HE4 as it keeps alive the aspiration of a local list being produced.

The NPPF recognizes the value of local lists as it specifically refers to these in the definition of heritage assets in the glossary.

Para 6.4.110 of LPP2 of the current Local Plan recognizes the value of a local list with an example of when it would be helpful as follows: "Some of these buildings and structures will have historic or architectural value and the planning authority will consider whether or not there is justification to include a redundant building on the local list as an 'un-designated heritage asset.'

Such a list would raise the visibility of such buildings and so give greater protection to significant unlisted buildings outside conservation areas which might otherwise be harmed or lost which we believe has happened in Winchester Town. It is also worth remembering that the category of non-designated heritage assets is wide and is not just limited to buildings but can extend to any feature that has heritage significance.

The Trust re-iterates its request that the policy retains the aspiration of preparing a list of non-designated heritage assets.

## **Policy H9 – Purpose Built Student Accommodation (PBSA)**

### **Objections and Comments**

The universities make positive and significant contributions to Winchester, which add to its reputation as a historic centre for education and scholarship. However, the potential impact from such a financially competitive sector as PBSA on a town of Winchester's small size and sensitivity, where a delicate balance needs to be maintained among competing demands, must be carefully managed. If a spatial plan for Winchester Town is prepared it could help in indicating areas that would be suitable for this type of development.

The Topic Paper on Student Accommodation refers to the anticipated increase in student numbers with the University of Winchester forecasting an increase over the long term of 3,000 students and Southampton University intending to grow its numbers in Winchester over the next 10 years wanting up to 500 PBSA bed spaces over the next 10 years.

The Topic Paper recognises there needs to be control over the siting of PBSA in Winchester. It refers in paragraph 3.13 to the Homes for All consultation in 2021, which agrees there should be greater control over student housing. Also, paragraph 9.67 of Regulation 19 Plan refers specifically to the potential harm if PBSA are built in established residential areas, but this is not addressed in the policy.

The Trust considers that Policy H9 is too permissive requiring PBSA only to be within easy walking distance of university facilities without any other criteria. This is too wide as the central area of Winchester is small and all of it is easily walkable by the able-bodied as is demonstrated by existing PBSA already spread across the city (from Winnall to Romsey Road). This policy therefore needs to be re-drafted to set stricter criteria and exclude PBSA from established residential areas.

Examples of stronger criteria that could be adopted:

- Encourage university and other educational bodies to prepare masterplans for approval by the local planning authority to guide accommodation and other university facilities.
- In the absence of a masterplan, PBSA should normally be on a university campus or possibly adjacent to a campus. The Topic Paper in paragraph 3.14 refers to the 2021 Consultation, concluding that PBSA should be provided on or close to university campuses.
- PBSA are unlikely to be acceptable in the middle of established predominantly residential areas but could be acceptable on the edge of such areas.

Other conditions that would be appropriate to control the use of PBSA include:

- a requirement to include a legal agreement between the developer, university and the local planning authority to restrict occupation to full time students enrolled on courses of one academic year or more.
- The University of Winchester has clear policies preventing students from having cars on campus, and to support this policy which is in line with the current direction of travel policies for Winchester, on-site parking should be restricted to disabled, service and operational parking. Such a policy would not prevent short stay loading and unloading of students' possessions but would prevent longer term parking.

## **Strategic Policy E6 Retaining Employment Opportunities**

### **Objections and Comments**

The Trust welcomes the Council's amendment of E6 iii. to read:

"The potential of the site or building to be developed for a mixture of uses that include a **significant amount of employment**" [our emphasis]

but we are concerned that there is one paragraph of the policy that is too weak to prevent the loss of employment uses when there is still an economic need for it to be retained.

Paragraph 10.101 defines the intention of the policy to protect employment land in order "to support the economy of Winchester District" from competition by other more profitable uses, and makes clear that "employment uses are particularly vulnerable to redevelopment."

The Trust believes the wording of paragraph E6 vi. ("The benefits of the proposed use compared to the benefits of retaining the existing use") should be deleted as it is both unclear and provides an opportunity to make an easy argument for a change to a more profitable use and the loss of employment uses. An example of this happening is the development of PBSA on the Winnall business estate.

A better and more relevant test would be a clause along the following lines: "The land is no longer required to meet the economic development needs of the area."

## **Policy W4 Land west of Courtenay Road**

### **Objection and Comments**

Housing development: Size 5.7ha. for 150 dwellings

This site allocation is within the Winchester – Kings Worthy/Headbourne Worthy Settlement Gap, to which Policy NE7 applies which states:

"The local planning authority will retain the generally open and undeveloped nature of the following defined 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."

The supporting text to Policy W4 in paragraph 12.41 states that: 'The site is within the currently defined Winchester to Kings Worthy/ Headbourne Worthy settlement gap. However it is well

contained and suited to development and development would not extend the built up area beyond its current northern boundary [the rear gardens of Colley Close] helping to retain the openness of the settlement gap.”

This statement displays a limited understanding of the spatial quality of the gap which extends from the allotments in Park Road to the south, across the allocation site used for arable agriculture and the Barton Farm Nature Reserve to Well House Lane, Headbourne Worthy in the north. To the west is the railway line with the 2,000 house allocation of Barton Farm beyond.

By virtue of its small area, the settlement gap plays an important and valued role in separating the settlements of Winchester, Kings Worthy and Headbourne Worthy.

There is a well-used footpath that passes under the railway line from Kings Barton to Worthy Road and around the recently established Nature Reserve. Kings Barton is a development of 2,000 houses. The arrival of the new residents at Kings Barton has meant that the value of the open space within the gap has grown, rather than diminished.

The allocation of the arable land between the Park Road allotments and the Barton Farm Nature Reserve for 150 dwellings represents a scale of development that would undermine the function of the gap and threaten the open and undeveloped nature of the gap, which Policy NE7 seeks to protect.

The need to allocate land for housing should not outweigh the objectives and constraints of sound planning policies.

To comply with Policy NE7, the site allocation for 150 dwellings should not be permitted and Policy W4 should be omitted from the Regulation 19 Plan.

### **Policy W5 Bushfield Camp Employment Allocation**

The Trust is a party to a combined objection to this policy by 11 organisations submitted separately from this submission

## **MIXED USE ALLOCATIONS**

### **Policy W7 Central Area Regeneration Objections and Comment**

#### **Comment**

The site plan on page 341 shows the site allocation in two colours, green and brown. No key is provided. This divides the site into two areas, when compared to the site area used in the adopted Supplementary Planning Document (SPD) para 12.71, which included the green and brown areas to be part of the regeneration development for the area, including the current Cossack Lane surface car park north of Friarsgate.

#### **Objections**

1. The Allocated Use is mixed use with an indicative number of dwellings of 300. No detailed masterplan has been prepared for the Central Area following the adoption of the SPD. An explanation of how this number of dwellings has been calculated needs to be provided. This and other policies for development sites in Winchester Town should take account of the provisions of paragraph 127(a) of the NPPF, that minimum density standards should be set.
2. We are concerned there is insufficient direction about the management of movement in and through the development. The Trust recognises there is no clarity about how movement around Winchester is to be planned, given the lack of any details developed under the Winchester Movement Strategy, which is one of the reasons we have argued for the

production of a spatial plan for Winchester Town. We therefore take the view that the wording of paragraphs vii. and x. is too loose and would be improved if these were combined and reworded to indicate a clearer way forward, by requiring the Winchester Movement Strategy to be developed with proposals for movement around Winchester before a masterplan is prepared. This would be in line with the vision-led approach for sustainable transport now required by paragraph 112 of the NPPF.

The present wording of the two paragraphs is:

Policy W7 vii. "The proposals improve facilities for those walking, cycling and wheeling, in line with the LCWIP and Winchester Movement Strategy."

Policy W7 x. "The proposals make the provision for buses and coaches."

These policies need to be combined to state something along the lines of:

"The proposals for movement and access to and within the regeneration area must be made within the context of the Winchester Movement Strategy. This Strategy needs to be developed with detailed and adopted proposals for traffic, public transport, access, deliveries, walking, cycling and pedestrian zones to achieve the objectives set out in the Strategy, in order to provide the required movement context before a masterplan for the comprehensive mixed-use development of the area is prepared."

## **MIXED USE ALLOCATIONS**

### **Policy W8 Station Approach Regeneration Area**

Our objection to the policy for the Central Winchester Regeneration Area, W7, included comments about insufficient direction for the management of movement and we have a similar objection to this policy.

While the supporting text in paragraph 12.85 refers to encouraging active travel options and the opportunities to reduce the use of cars, there is no reference to the role of buses in the policy and no reference at all to the Winchester Movement Strategy, or that it should be progressed from its current lack of content in a way that will give direction to the connection of movement to and from the Station, the rest of Winchester and the surrounding areas.