

# Winchester City Council Local Plan Examination

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

## Subject Matter 10: Homes for all

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

### **Policy H9 – Purpose built student accommodation (PBSA)**

**Q1. Would policy H9 provide appropriate clarity to direct PBSA to acceptable locations? Would requirements in relation to cycle and car parking be clear and unambiguous? Would they accord with the Plan's transport policies in particular T1 and T2?**

- 1.1 The Commissioners are agreed that PBSA should be provided in locations that are easily accessible to the establishment it is planned to serve by existing/proposed walking, cycling or public transport routes and that adequate cycle and car parking provision is made within the development. Please see below response to question 2 in terms of whether the policy provides appropriate clarity to direct PBSA to acceptable locations.

**Q2. Would policy H9(v) strike the right balance between providing for PBSA and protecting the District's local distinctiveness and the delivery of planned growth within the Plan period?**

- 1.2 Policy H9, point (v) states that, amongst other criteria, the housing needs of students will be supported where *"the proposal is not on a site allocated for other uses, or where there are policies in place to protect the existing uses such as open space, employment or facilities and services"*.
- 1.3 As set out in our representations to the Regulation 19 Local Plan consultation (ref. ANON-AQTS-32U5-8) the Commissioners consider that this wording should be amended so that it does not, as a matter of principle, preclude the provision of academic/student accommodation on all sites allocated for 'other' uses. This is particularly relevant to large sites which are allocated for a mix of complementary uses, such as Bushfield Camp.

- 1.4 As set out in the Planning Statement submitted with application ref. 23/02507/OUT - the outline application for Bushfield Camp (on allocated site Policy WT3 of the adopted Local Plan – Policy W5 of the emerging Local Plan), the vision for the scheme includes an urban campus development. The application describes the ‘Bushfield Knowledge Quarter’ proposals as a campus on the edge of the existing city which integrates with the surrounding community, offering access to a wide range of amenities and services.
- 1.5 Associated with the academic floorspace on site, the proposed scheme includes the provision of academic accommodation (up to 525 beds). The combination and interaction of commerce, research and academia means people will visit the site for extended stays. As such, the academic accommodation will specifically cater to those studying or working at the academic institutions on site and will be ‘inward facing’. The Planning Statement describes the accommodation in further detail (paragraphs 9.38 – 9.49), points of note include:
- Academic accommodation at Bushfield Camp will primarily meet a need of the future occupiers of the site.
  - Ongoing discussions are taking place regarding the integration of broader academic innovation hubs on the site with local higher education providers.
  - These discussions have centred around the higher education facilities, with supporting amenity and facilities being essential to creating a sense of place and establishing a knowledge quarter identity.
  - There is a strong link between students living at the site and the provision of innovation and academic floorspace.
  - The Knight Frank report on Economic Market Drivers (appended to the Planning Statement submitted with application ref. [23/02507/OUT](#)) provides a series of case studies which help to demonstrate how a similar mix of uses, including academic accommodation has led to successful employment led schemes elsewhere - including Cambridge Biomedical Campus. Key findings within the report include:
    - i Occupiers are generally reducing in scale and are now looking to take space within environments which provide a broader range of facilities, and which are specifically attractive to talent, which, once recruited, must be retained.
    - ii This has influenced the development of mixed-use campus schemes with masterplan design being adapted to provide a wider range of uses.
    - iii Recent expansion of the innovation and research and development sectors are attracted to locations which have talent with science related credentials - this includes Southampton Science Park developed in conjunction with Southampton University.
- 1.6 The inclusion of academic accommodation at Bushfield Camp is one of the key components to creating a successful and thriving matrix of occupants, providing sustainable and affordable living accommodation and attracting talent to support the academic and employment uses on the site.

- 1.7 Legal & General ('L&G'), part of the Development Partnership for the Bushfield Camp proposals, has successfully invested in this combination of complementary uses across the country, with L&G campuses in Newcastle, Bristol and Oxford, the latter as part of a joint venture with Oxford University at their Begbroke Innovation District. This sees the expansion of the existing Begbroke Science Park, a cross-departmental research facility owned by Oxford University. The expansion plans will deliver a range of research and development facilities as well as complementary uses including new homes, a proportion of which will be provided for students and those working for the University at the Science Park. This will support its expansion and reduce car journeys to/from the city centre.
- 1.8 Like Begbroke, for the Bushfield Camp Knowledge Quarter to work successfully, it is critical that future needs are anticipated to be able to effectively plan for society's changing requirements rather than needing to alter schemes retrospectively based on latent demand. The academic accommodation supports the function of the academic floorspace, research and development uses and other businesses on site. The accommodation is therefore a key element of the Bushfield proposals in attracting and retaining both talent and investment to the site and is crucial to the Knowledge Quarter's success. Whilst this type of accommodation proposed at Bushfield Camp should not be defined as PBSA, we are seeking further clarity in the policy.
- 1.9 In view of the above, the wording of Policy H9 point (v), should be amended to ensure that there is no blanket ban on academic/student accommodation to be provided on an allocated site, specifically large sites which are allocated for a mix of uses. We would therefore recommend removal of reference to allocated sites from the policy completely. Such a use proposed on an allocated site would need to be considered on its merits at the time an application was submitted. Alternatively, the wording of point (v) could be amended to state: *"the proposal is not on a site allocated for **a single use**, or where there are policies in place to protect the existing uses such as open space, employment or facilities and services"*.
- 1.10 Both of these alternatives would align the policy with the objectives of paragraph 86 of the NPPF (2024) which states, inter alia, that policies should be flexible enough to accommodate needs not anticipated in the plan and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances. This is exactly what the Bushfield Camp proposals seek to achieve. The incorporation of academic accommodation is key to delivering a scheme which in overall terms meets the requirements and objectives of policy W5 (and paragraph 86 of the NPPF) and such complementary uses should be treated on their merits at the planning application stage and not restricted by a general policy. The current wording of policy H9 is clearly inconsistent with the Government's aim of ensuring that planning policies should help create the conditions in which businesses can invest, expand and adapt.

## **Policies H5-H8 and H10-H11.**

- 1.11 No comments.