

Examination of the Winchester District Local Plan 2020-2040 (the submitted Plan/the Plan)

Winchester College – Hearing Statement

Matter 12 – High Quality, Well Designed Places and Living Well

Regulation 19 consultation reference number: BHLF-AQTS-328K-1

As set out in Document ED17:

- Strategic Policy D2 Design principles for Winchester Town

Question 2: Would strategic policy D2ii and viii, in referring to '...masterplans ... and other relevant planning documents that have been prepared and consulted on with the involved community...', provide the necessary clarity?

Strategic Policy D2ii requires it to be demonstrated that development proposals address relevant aspects, identified characteristics and principles set out in masterplans... and other relevant planning documents that have been prepared and consulted on with the involved community. Similarly D2viii requires proposals to deliver transport improvements identified in the Winchester Movement Strategy, Winchester Walking Strategy and City of Winchester Local Cycling and Walking Infrastructure Plan and other relevant transport documents that have been prepared and consulted on with the involved local community.

It is not appropriate for local policy to be subsumed into the Local Plan without the scrutiny that is required of development plan documents. If the Council wishes these local policy documents to carry some weight, they should be adopted as Supplementary Planning Documents.

Winchester College strongly objects to the requirement to deliver the transport improvements identified in the Winchester Movement Strategy, Winchester Walking Strategy and City of Winchester Local Cycling and Walking Infrastructure Plan unless it can be demonstrated that these improvements are necessary to make the development acceptable. As a CIL charging authority, should there be a requirement to fund infrastructure improvements such as those identified, this should be included within the levy and subject to public examination to enable proper consideration of viability.

As drafted the policy is entirely unclear as to what transport improvements would need to be funded by a development and it is therefore unsound.

As set out in Document ED17:

- Strategic Policy D5 Masterplans

Question 1: Would strategic policy D5 be clear in its policy wording and supporting text as to what development would require a masterplan (para 5.70 states ‘...assessed on a site by site basis...’, strategic policy D5 states at different parts ‘...on larger sites ... significant development on sites occupied by major landowners/users...’) when they should be prepared, how they would be agreed by the local planning authority, and their status on that agreement? In this regard would the policy be clear and unambiguous so as to be effective?

The policy as drafted is ambiguous and therefore not effective.

It is not clear from the supporting text or draft Policy D5 when a masterplan would be required, how they would be agreed by the local planning authority, what right of appeal an applicant would have if they could not reach agreement or how they could be amended should needs change over time.

In its response to comments submitted at Regulation 18 stage (reference 267699756), the Council confirms that it has approved an *Approach to Concept Masterplans* document. This is not referred to in the submission plan, was not subject to any form of public consultation and it is not clear what status this has or whether the Council’s approach can be changed at any point. If this document is required to understand Policy D5, then it is clear that the policy is unsound as currently drafted.

Winchester College wishes to draw the Inspector’s attention to its representations on this policy at both the Regulation 18 (reference 267699756) and 19 (reference BHLF-AQTS-328K-1) stages of the Local Plan as the issues raised have yet to be satisfactorily addressed.

Question 2: Would its policy requirements provide appropriate flexibility so as to strike the right balance between ensuring high quality design and sustainable development is approved without delay?

As drafted, Policy D5 is likely to result in significant delays to approving high quality and sustainable development as it requires that a masterplan is developed with input from the local planning authority and following community engagement in advance of submission of a planning application for all proposals on larger sites or that may be brought forward in phases. There is no flexibility built into the policy to allow for proposals to come forward without agreeing a masterplan in advance and as it is not clear when one would be required (e.g. what constitutes a larger site, significant development or a phased development), the potential for delay is significant. Winchester College is subject to a continual programme of works, each of which could be considered a discrete project or alternatively as a phase of the wider development. If it were the latter, any development on the College estate would require the submission of a masterplan or to be in accordance with a previously approved masterplan.

Please see Winchester College’s previous representations made at the Regulation 18 and 19 stages on Policy D5.

Question 3: Would this policy have a clear purpose, avoiding repetition in other Plan policies (e.g. site allocation policies and other design policies (strategic policies D1, D2, D3 and D4 in particular)?

The other design policies in the draft Local Plan, the High Quality Places SPD together with the National Design Guide included within Planning Practice Guidance, provide sufficient advice on design matters to render draft Policy D5 unnecessary.

Question 4: Would the third paragraph of strategic policy D5 provide the necessary clarity to ensure effectiveness, in particular ‘... should be preceded by...’?

With respect to the third paragraph, it is not clear whether a Masterplan will be required for all significant landholdings, even those where limited new build development opportunities exist, or which will largely rely on the repurposing of existing buildings. Clarification is requested.

Question 5: Given that the Plan should be read as a whole, what is the justification for strategic policy D5xiii, xiv and xv?

Winchester College consider that D5xiii, xiv and xv include unnecessary repetition to the policy requirements of other policies in the plan and therefore are not consistent with NPPF paragraph 16(f) which requires plans to f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).