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Winchester District Local Plan

Winchester City Council Local Plan Examination

Hearing Statement Matter 16:

Creating a vibrant economy (including site allocations)

April 2025



Winchester
City Council

Matter 16: Creating a vibrant economy (including site allocations)

Issue: Would the strategy and provision for employment development and town, district and local centres be effective and justified and are the individual economic growth policies clear, justified and consistent with national policy, and would they be effective?

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Employment and retail requirements

1. With particular regard to the Employment Land Study [VE08] and Employment and Town Centre Uses Study (ETCUS) [VE03] is the gross additional need for employment land of between 27.6 and 37.8 hectares as set out in the submitted Plan justified by robust evidence?

WCC response

- 1.1 Strategic Policy E1 of the proposed plan sets out that provision for around 39ha of employment land will be made available through the Local Plan. This is to meet the employment needs over the plan period to 2040. Reference to an employment need of between 27.6ha and 37.8ha is set out in various sections of the Plan (paragraphs 10.13, 10.17 and Table C). This is a typographical error – the correct figures are 27.6ha and 38.9ha, and Proposed Modification PM220 is suggested to rectify this.
- 1.2 The Employment Land Study (ELS) (VE08) was prepared in accordance with the relevant sections of the NPPF and PPG at the time of publication and provides the Council with a robust evidence base to justify policies set out in the Local Plan.
- 1.3 The ELS sets out that Winchester is covered by a number of Functional Economic Market Areas (FEMAs) and that some of the key economic drivers for growth, supported by regional bodies were aimed at the professional, scientific, information and communication and retail and health sectors. This is supported by the socio-economic base-line of the Winchester Plan Area, which shows it to be a diverse economy with higher levels of home working than on average and an aging population; the over 65s displaying the largest projected growth. Annual earnings in Winchester are broadly in line with Hampshire and England, however house prices are considerably higher.
- 1.4 The study was supported by a series of 1 to 1 interviews conducted with stakeholders in the office, industrial and more general employment markets. The feedback from stakeholder engagement was then utilised the assessment of future needs for Winchester.
- 1.5 A total of 7 different employment land scenarios were developed and were then assessed in the context of the wider economic factors of the area, the baseline profile and stakeholder engagement. These are set out in table 56, page 114 of the ELS (VE08).
- 1.6 The ELS (VE08) shows that a margin of flexibility as set out in Table 39, (pages 97-100) has been used. A level of flexibility based on 5 years of completion trends has been used in the job growth scenarios.
- 1.7 The need for Industrial Land (B2/B8) is based on an average of the 3 econometric forecasts used in the study (26.7ha). The forecasts prepared by Experian, Cambridge Econometrics and Oxford Economics were each

analysed and compared to the past completion trend of 24.3ha. Working from Home (WFH) scenarios were also considered, but discounted as the sectors which fall into B2/B8 use classes have low a WFH prevalence. The job growth scenarios showed a range in the level of future need, with the mid-point aligned well to the past trend scenario A need of 26.7ha is considered to be a realistic assessment and will deliver the areas growth aspirations.

1.8 The labour demand scenarios as outlined above are show higher levels of need than the past completion trend of 3.3ha, this is because all forecasts show high job growth at very similar levels in those sectors typically requiring office space. The use of a WFH sensitivity makes a slight reduction in the quantum of land needed over the plan period. Again, using an average of the 3 labour demand scenarios shows a need of 12.2ha. Using the past completion trend of 3.3ha would suggest that the needs arising from projected growth would not be met.

1.9 Combined together, this shows a need of 27.6ha to 38.9ha over the plan period. The ELS shows that a margin of flexibility. as set out in Table 39, (pages 97-100) has been used. A level of flexibility based on 5 years of completion trends has been used in the job growth scenarios.

2. The Plan sets out that the current identified supply (commitments and site allocations) of roughly 39 hectares of employment land to be sufficient to meet identified needs. In this respect, roughly 20 hectares of employment land would be allocated in this Plan. Would this approach that effectively rolls over existing site allocations from the extant local plan be justified by robust evidence?

WCC response:

1.10 In assessing land to meet development needs PPG requires “suitability, availability and achievability” to be considered to establish if sites are likely to be developed.

1.11 PPG states that for sites to be considered suitable, regard should be had to the following factors in Paragraph: 018 Reference ID: 3-018-20190722. PPG states that to be considered available, sites should meet the factors set out in Paragraph: 019 Reference ID: 3-019-20190722. With regard to achievability, the PPG identifies factors that should be considered when assessing the achievability of sites in Paragraph: 020 Reference ID: 3-020-20190722.

1.12 PPG also notes that when constraints are identified that impact the suitability, availability, and achievability of sites “the assessment will need to consider what action could be taken to overcome them. Examples of constraints include policies in the National Planning Policy Framework and the adopted or emerging development plan, which may affect the suitability of the site, and unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners, which may affect the availability of the site.” (Paragraph: 021 Reference ID: 3-021-20190722).

1.13 In gathering evidence to plan for business uses, PPG states that planning authorities need to liaise closely with the business community, to assess “evidence of market demand (including the locational and premises requirements of particular types of business)”. Developers, property agents and businesses are cited as sources of this data.

1.14 These factors have informed the selection of sites in the Proposed Submission Plan. Evidence of market demand is set out in the Employment Land Study (VE08). The process followed in considering the suitability of sites is outlined in paragraphs 5.1 to 5.4 of the Development Strategy and Site Selection Background Paper (SD10b), namely - considering whether there was still an intention to develop carried forward sites; assessing whether new issues had arisen which demonstrated that they were not deliverable; and reappraising those sites through the Integrated Impact Assessment. The suitability, availability and achievability of sites was considered through this process. The Integrated Impact Assessment contains a sustainability appraisal of each site. Further evidence on the availability and achievability of sites is set out in Appendix 1 and 2 of the Hearing Statement for Matter 5, as well as the responses to questions in the Hearing Statement for Matter 8.

3. Would the Plan provide for the type of employment land required? In particular, would it provide for the needs of offices (use class E(g)) and other employment land (use classes B2-B8) during the Plan period, taking account of existing commitments and proposed site allocations?

WCC response:

1.15 The Proposed Submission Plan sets out the existing commitments and proposed allocations for employment uses as follows -

Site reference	Anticipated Employment area (ha)	Employment land type (ha)		
		Offices Class E(g)	Other employment Uses Class B2-B8	No prescribed mixture – Class (g) and B2-B8
Commitments (Table A p. 262 Proposed Submission Plan)				
Newlands (SH1)	15.25			15.25
Sun Lane (NA2) 17/01528/OUT	3.0			3.0
Bottings Ind. Estate 20/00494/FUL	0.88			0.88
New Barns Farm 18/01651/FUL	0.41			0.41
Gentian House	0.09		0.09	

20/00229/FUL				
Cavendish Centre 19/01055/FUL	0.27	0.27		
Masons Meadow 20/01687/PNACOU	0.05			0.05
Selhurst Poultry Farm 20/00557/FUL	0.23	0.04	0.19	
Allocations (Table B p. 263 Proposed Submission Plan)				
Bushfield Camp (W5)	11.8	11.8		
Central Winchester Regeneration (W7)	1.0	1.0		
Solent Business Park (SH4)*	4.0	4.0		
Tollgate Sawmill (BW3)	2.2			2.2
Morgan's Yard (WC1)	0.18			0.18
Totals	39.36	17.29	0.28	21.79

* the response to question 2 regarding site SH4 (Solent Business Park) in this statement sets out a Proposed Modification to amend the anticipated yield from 4 ha of office development to 2 ha with no particular prescription.

1.16 The type of employment land expected to be delivered has been derived from the existing permissions on site or other circumstances which have informed the anticipated yield.

1.17 Table C on page 264 of the Proposed Submission Plan shows how these figures compare to the identified land requirements in the Employment Land Review (VE08).

	Land requirements (ha)		
	Offices	Industrial and Warehousing	Total
Identified need – Lower Range	3.3	24.3	27.6
Identified need – Upper Range	12.2	26.7	37.8
Supply – current expectations of uses where known	17.29	0.28	17.57
Supply – sites with no particular prescription	21.79		21.79

1.18 The above figures should be adjusted to take account of the updated position regarding Solent Business Park, and the typographical error identified in the answer to Question 1. This results in the following revised position –

	Land requirements (ha)		
	Offices	Industrial and Warehousing	Total

Identified need – Lower Range	3.3	24.3	27.6
Identified need – Upper Range	12.2	26.7	38.9
Supply – current expectations of uses where known	13.29	0.28	13.57
Supply – sites with no particular prescription	23.79		23.79

1.19 On this basis, the identified supply of office development (13.29 ha) exceeds the upper range of identified need (12.2ha) by 1.09 ha. The supply of land for industrial and warehousing (0.28 ha) is small, but the large amount of land with no particular prescription (23.79ha) means that 24.07 ha is available on identified sites for those purposes, with further windfall development anticipated. The sites included in the 23.79 ha total of land with no particular prescription are considered potentially suitable for industrial and warehousing development. In particular, such development has already been delivered at Newlands (SH1) which makes up the majority of this land.

1.20 Where the circumstances of the site, due to layout, location, or other constraint do not dictate a particular use class, the approach is to not specify which of the employment use classes (offices, light industrial or warehousing) should be delivered. This is in line with the advice in the Employment Land review regarding the flexible units sought by occupiers in this market. This means a large amount of the supply has no particular split between offices, light industrial or warehousing use, providing flexibility to meet the needs for these uses as required. It is acknowledged that the current total yield of office development is higher than the identified need, but the flexibility in delivery provided by the plan approach mitigates this. It is worth noting that in addition to the identified supply set out above, it is anticipated there will be further development within the rural areas, including farm diversification, which also provides additional capacity to ensure the identified needs are met.

1.21 The Employment Land Review outlines uncertainties including the long term impact of changing working practices resulting from the covid pandemic and working from home. This reduces the certainty which can be applied to economic forecasts and the future need for the different types of employment land. The Study seeks to mitigate that risk by utilising three econometric models and a trend based scenario to generate a range of development needs. In addition, a margin of flexibility based on 5 years of completion trends has been used (set out in Table 39, pages 97-100). The Plan has sought to deliver sufficient land to meet the higher end of that identified need. The future Plan review will need to take into account an updated evidence base to address any further changes to the economic situation and the new requirements set out in the revised NPPF.

4. Given the District's historic reliance on employment floorspace within farm sites how would the Plan provide for employment land supply in rural areas?

WCC response:

- 1.22 The ELS (VE08) shows that around 29% of all jobs are located within rural areas, whilst most of these jobs are within typical rural based sectors – agriculture, forestry, fishing etc. there are a higher proportion of jobs from the information and communication, arts, entertainment and recreation and construction sectors based in rural locations than urban. Whilst it is not possible to link completion data to the sectors a development serves, data shows that around 20% of the total number of all employment developments in WCC are at farm diversification locations. This equates to around 22,705 sqm being completed on farm sites since 2012/13, which is around 35% of all gross employment floorspace in Winchester in the same period.
- 1.23 This level of development has been achieved through the application of the extant development plan policy (MTRA 4 – Development in the Countryside) which is broadly similar to and aligned to proposed policies E10 Farm Diversification and E9 Economic Development in the Rural Area. Policy E9 goes further than adopted Policy MTRA4 in that it specifically allow for proposals for new industrial and commercial development to be considered where there is a demonstrated need. While the impact of this should not be overstated, it provides further confidence that the levels of development delivered in the rural areas under the adopted Plan will have a policy basis to continue.

5. Would the Plan provide appropriate flexibility regarding the specific makeup of employment land, given the uncertainty over forecast scenarios and continuing structural changes?

WCC response:

- 1.24 Yes. Table C on page 264 of the Proposed Submission Plan (SD01) set out the anticipated yield of employment floorspace by type. The table shows that the majority of floorspace expected to come forward is on sites with no particular prescription between offices, industrial, or warehousing uses. This is in line with the advice in the Employment Land Study (July 2024) (VE08) that recent years have seen a strong and steady development of mid-sized flexible industrial units being advertised and taken-up by a mix of B2 and B8 occupiers which is expected to continue (para. 10.3.2) and a recognition of a period of change in the need and occupancy of office developments (para. 10.4.3). The overall assessment of employment land requirements is considered robust, including, a margin of flexibility based on 5 years of completion trends (Table 39, pages 97-100) (VE08). The Plan has been prepared positively, aiming to meet the need identified for each type of employment land in the Employment land Study Further flexibility is provided by proposed policy E9, which allows for development outside of settlement boundaries in where local need can be demonstrated.

Strategic policy E1 Vibrant economy

- 1. Strategic policy E1 is long and is not broken up by clauses or criteria. The preamble to the policy is again long and includes repetition e.g. paragraphs 10.21 and 10.28. On this basis, would the policy be clearly written, and unambiguous, so it is evident how a decision maker should react to a proposal?**

WCC response:

- 1.25 The purpose of Strategic Policy E1 is to set out the Local Plan approach to encouraging economic growth in line with key strategies the Carbon Neutrality Action Plan and the Green Economic Development Strategy. It sets out how the Plan will make provision for employment land to meet identified needs and encourage growth across the diverse plan area. In these regards it is similar in scope and purpose with Strategic Policy H1 for Housing Provision) and directs the decision maker to consider how development proposals contribute to economic growth.
- 1.26 The Policy developed over the course of the preparation of the Plan, incorporating the outcomes of the Strategic Issues and Priorities consultation and the Regulation 18 draft Local Plan consultation. It is recognised that the supporting text is long but this reflects the range of issues to be considered in policy E1, and the different matters to be considered. For example, paragraph 10.21 describes the amount of employment floorspace which has historically come forward on farm sites, and paragraph 10.28 describes the nature of rural economy and how the Plan will provide for appropriate growth in these locations.
- 1.27 The council consider that Policy E1 is clearly written and unambiguous in establishing what the local plan is seeking from planning applications regarding economic growth, at an appropriate level for a strategic policy, with further detail provided by other policies in this chapter and the plan more generally.

- 2. The policy provides support for retention of appropriate premises and sites. Should the policy provide specific support for the redevelopment of existing employment sites as a source of additional employment provision?**

WCC response:

- 1.28 Policy E1 supports new employment development and as a result of public and stakeholder engagement, has evolved over the course of the production of the Plan to include further detail and makes specific reference to retention, regeneration, refurbishment modernisation and intensification of land. This is to provide flexibility in regard to the particular make-up of employment development, outside of any specific requirements set out in site allocations.

1.29 It is not considered necessary to specify that this includes the redevelopment of existing employment sites as a source of additional employment provision. Having regard to the length of Policy E1, It is considered that the policy is sufficiently detailed already. The redevelopment of existing employment areas is unlikely to result in a meaningful increase to employment land provision across the District. Redevelopment of existing units and emp areas is typically to ensure older building meet current occupier requirements, such as; building efficiency, lower operating costs, higher environmental / sustainability credentials and EPC ratings.

3. Would the policy appropriately provide for activities outside the traditional office and industrial sectors? e.g. the education, health, retail and leisure and other service sectors?

WCC response:

1.30 Policy E1 provides support for a wide range of activities that support the economic development of the district. In doing so Policy E1 provides flexibility in regard to the particular make-up of employment development, outside of any specific requirements set out in site allocations.

1.31 Policy E1 acknowledges that this includes a wide range of uses and activities and paragraph three lists some of the existing strengths that exist in particular areas outside of traditional industrial use classes. It is not considered necessary to list all of these activities, particularly given the length of the policy. There is also a risk that in seeking to list all other permissible uses, flexibility to respond to changing provision during the Plan period could be reduced, by the omission of other uses that may also be acceptable.

1.32 The plan should be read as a whole and there are other policies of the plan that may be more relevant for assessing the wider societal benefits of activities such as those for education and health. Retail, leisure and health services may also fall under consideration as part of policies relating to town centre development.

4. For the purposes of soundness, should strategic policy E1 state a requirement for a comprehensive assessment of the impact of new employment sites on the road network, particularly where close to Strategic Road Network junctions?

WCC response:

1.33 No. It is noted that National Highways commented in response to policy E1 that any application for significant amounts of new employment floorspace or residential dwellings, whether on new sites or expansions to existing sites, should include a comprehensive assessment of the impact of the proposals on the road network and where close to a SRN junction, includes full turning movements.

- 1.34 The Strategic Transport Assessment (ST15) has considered the potential traffic impacts upon the local and strategic road network of the allocations in the Plan, and where necessary the allocations have identified any specific measures such as in the case of Bushfield Camp, Policy W5i. Policies T1 to T4 already include a comprehensive set of policies to address the transport impacts of development and no further statement is necessary.

Strategic policy E2 Spatial distribution of economic growth

1. Would the spatial distribution of economic growth accord with the Plan's spatial strategy as set out in strategic policy SP2?

WCC response:

- 1.35 Yes. Strategic Policy SP2 sets out the spatial strategy of each of the Plan sub areas identified in the local plan Vision. The policy sets out the nature of economic growth envisaged for each sub area. Strategic Policy E2 sets out the spatial distribution of economic growth for each sub area, and identifies the locations within each area where new growth can be accommodated. This distribution of growth is supportive of the spatial strategy, with the allocations and development anticipated to come forward in each sub area supportive of the vision as follows-
- 1.36 Winchester Town – emphasis in SP2 on higher education, creative and knowledge industries supported by the proposals for a high quality flexible business and employment space and innovation and education hub and creative industries at Bushfield Cap (W5) and generally by other allocations in the City;
- 1.37 South Hampshire Urban Areas – emphasis in SP2 on contributing towards the Partnership of South Hampshire strategy of improving economic performance supported by policies a significant amount of employment floorspace at allocations in Newlands West of Waterlooville (SH1) and Solent Business Park in Whiteley (SH4); and
- 1.38 Market Towns and Rural Areas – emphasis in SP2 on economic development that serves local needs in the most sustainable settlements supported by allocations in the two most sustainable settlements, the market towns of Bishop's Waltham (BW3) and New Alresford (NA2), as well as a smaller allocation in the intermediate rural settlement of Waltham Chase (WC1).

2. Would the proposed site allocations for employment, mixed development and large housing development which include employment uses provide for the identified need for employment land as set out in strategic policy E1?

WCC response:

1.39 Yes. Strategic Policy E1 sets out the Local Plan will provide for about 39 hectares of employment land. This is in response to an identified need of 27.6 ha to 37.8 ha in the Employment Land Study (July 2024) (VE08) (para. 0.9.4). Tables A and B on pages 262 and 263 of the Plan set out the amount of employment land anticipated to come forward on sites with permission and allocations. Evidence on the delivery of allocations has been provided in response to Matters 4 and 5. It is also worth noting that additional sites and employment floorspace can come forward on sites in response to local need under policy E9, and the Employment Land Study (paras, 5.41 to 5.44) noted that farm sites have historically also provided a significant proportion of floorspace growth in the past, which is expected to continue and would be in addition to the sites listed in Tables A and B in the Plan. Overall, it is considered that the identified need will be met.

3. Would the policy be clear and unambiguous particularly in using the phrase ‘... appropriate growth and maintenance of existing employment within key settlements..’ ?

WCC response:

1.40 It is agreed that the wording could be made clearer. It is proposed that Proposed Modification PM206 as revised below amends the wording of policy

1.41 PM 206 Change wording of E2 as follows:

‘Appropriate growth, **and retention of land for employment uses** and ~~maintenance of existing~~ within key settlements...

Winchester employment allocations

Policy W5 Bushfield Camp

1. What would be the status of the masterplan? In dealing with matters to ensure the development of the site is acceptable in planning terms, would the policy be effective?

WCC response:

1.42 The city council has an agreed approach towards preparing Concept Masterplans which clearly sets out the process that the council expects applicants to follow. A Concept Masterplan for the Bushfield Camp site has now been agreed by Cabinet on the 21 June 2023. There is a ‘live’ (undetermined) outline planning application for the Bushfield Camp site (23/02507/OUT). In view of this the city council believes that the status of Concept Masterplans, which has worked well with another strategic allocation at the SJM Barracks agreed at Cabinet on 12th February 2025.

(<https://www.winchester.gov.uk/assets/attach/44392/Sir-John-Moore-Barracks-Concept-Masterplan.pdf>), is clear and the process that has been followed by the site promoters will ensure the development of the site is acceptable in planning terms and that the policy will be effective.

2. Given site constraints, including its location within a settlement gap, close to the South Downs National Park, its open green qualities, current use by the community, biodiversity and natural habitats and transport impacts, how has the developable area been defined (approximately 20 hectares)? Should this be included within policy?

WCC response:

1.43 Policy WT3 in the Winchester District Local Plan – Joint Core Strategy (LP02), which was adopted in March 2013 allocates the Bushfield Camp site as an employment site. At the time of allocating the site for employment the supporting text in the adopted Local Plan acknowledged that this is a sensitive site and in response to this, limits the total area of development to 20 hectares of land (the land that was previously occupied by the Army barracks – please see first bullet point in Policy WT3).

1.44 Policy W5 of the Regulation 19 Local Plan (SD01) has taken the same approach as Policy WT3 in the adopted Local Plan and it has restricted in criterion iii the area that can be redeveloped to same 20 hectares as the adopted Local Plan. It is important that the Local Plan is read as a whole as there a number of other Local Plan policies that deal with for example, the SDNP, settlement gaps, landscape, biodiversity and transport impacts.

3. What evidence supports the provision of office space within the 20 hectares developable area?

WCC response:

1.45 In terms of the evidence base that supports this employment allocation (20 hectares), this has been established in the July 2024 Employment Land Study (VE08). The conclusions of this study were based on the analysis of undertaking three separate employment forecasts over the period to 2040 (paragraph 6.7.1, page 89). The 20 hectares of employment space at the Bushfield Camp site would make a significant contribution to the need for 49.86 hectares of employment land across the district to 2040; without this employment allocation there would be a shortfall of employment space.

1.46 As mentioned in response to question 1, there is a live planning application on the Bushfield Camp site that clearly demonstrates that there is a site promoter that is actively pursuing this allocation and there is a need for this employment uses on the 20 hectares of land.

4. What is the justification for the site's development for high quality flexible business use and employment space, an innovation hub/education hub and

creative industries? Given the commuting patterns in the District would this site deliver necessary social, economic or environmental development?

WCC response:

- 1.47 As part of the Plan-making process and in response to changes that have taken place in the employment sectors, the wording of Policy W5 was slightly amended to cover 'mixed use high quality flexible business use and employment space, an innovation hub/education hub and creative industries'. It is important to note that as part of the evidence base that have been submitted to support the live planning application business parks are no longer occupied single employment use but instead they include a range and mix of complimentary employment uses. This also helps to create greater resilience in terms of peaks and troughs in the employment market that has been changing as a result of COVID and changes to national economy. Further evidence for the proposed range of uses is set out in Appendix 1 of the Concept Masterplan for this site, which highlights the potential for innovation in education and commercial sectors and collaboration between academia and private sector and government (para 4.3 to 4.5), market research and conditions identifying sectors which are appropriate uses likely to be attracted to the site (paras. 4.11 to 4.12) and the critical scale and mix of such a proposal (para. 4.13). The wording of Policy W5 has been clearly worded to not support town centre uses in accordance with the NPPF. If a proposal did come forward for a town centre use (as has been the case with the live planning application) it will be necessary for the applicant to submit the necessary supporting justification which would be assessed as part of the planning balance.
- 1.48 Taken together, delivering a significant new development containing a high quality flexible business use and employment space, an innovation hub/education hub and creative industries fully aligns with the Local Plan Vision for Winchester City, as well as the aims in policy E1 for economic growth. Providing a large employment site adjacent to the most sustainable settlement in the plan area is consistent with the overall development strategy set out in the Pan, including policies SP1, SP2 and H3.

5. Would the policy require phasing to align with the delivery of sewerage infrastructure?

WCC response:

- 1.49 Yes – the city council has been involved in ongoing discussions with Southern Water as part of the development of the Infrastructure Delivery Plan ([INO1](#)). The city council believes that the development would align with the delivery of sewerage infrastructure (criterion xvi, xvii and xviii).
- 1.50 The city council understands that the site promoters have also been in active and ongoing discussions with Southern Water / Environment Agency about bringing forward a Private Waste Water Treatment Plant on the site which would

address the demand for sewerage/nutrients. It is also understood that the details of this on-site facility will come forward as part of the additional information that would need to be reconsulted on in the next couple of months.

6. This site allocation is being carried over from the extant Plan. Given that it has not delivered yet, what evidence is there that it will deliver within the submitted Plan period?

WCC response:

1.51 Please see response to question 2. The city council have been in extensive ongoing discussions with the site promoters as part of pre-application discussions. As referred to question 1, a Concept Masterplan has been agreed by Cabinet and an outline planning application was validated on 27 Oct 2023 and has been consulted on. Subject to further public consultation taking place on a number of matters that needed further work, a decision on this planning application is expected to happen around June/July 2025. The site promoters have a team of considerable size working on this project, which indicates that they need a return on their investment. It is further understood that the site promoters are committed to bringing the delivery of this site forward once they secure planning permission.

7. Should the policy include requirements in relation to the nutrient neutrality solutions and impacts on the River Itchen SAC for the purposes of soundness?

WCC response:

1.52 Criterion xvi in Policy W5 already refers to the impact on the Solent SAC and the River Itchen SAC. It is important to read the Local Plan as a whole. Nutrient Neutrality and the impacts on the River Itchen SAC are also dealt with under Policy NE16.

Policy W6 Winnall

1. This policy aims to allocate and protect existing traditional employment uses, retaining 43 hectares of the area for traditional B2-B8 uses, with more flexibility elsewhere.

In relation to sub areas 1 and 2, policy W6 seeks to ensure retention of existing industrial type uses and the creation of additional B2 and B8 floorspace. In so doing, would the policy be unduly restrictive, particularly in terms of retail and leisure sectors beyond traditional industrial uses? Should it provide greater flexibility e.g. employment generating uses outside B use classes, including retail, leisure and other sui generis uses with the aim to better reflect the diverse economic base of the District?

WCC response:

1.53 The city council is aware that some of the representations that were submitted on this site allocation were seeking to extend the uses of land in sub areas 1 and 2. However, Winnall is the major employment location in Winchester Town and in this respect the city council is keen to ensure that it remains as an employment site.

1.54 In accordance with the definition in the NPPF, leisure uses are town centre uses.

*'Main town centre uses: Retail development (including warehouse clubs and factory outlet centres); **leisure**, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).'*

1.55 In view of this, the city council believes that the policy is in line with the requirements of the NPPF and if a use did come forward outside of the uses that have not been specified in Policy W6, the applicant would need to demonstrate the reasons why this use was acceptable with the necessary supporting information. The Town Centres Strategy and Hierarchy section of the Plan notes there is no demonstrable need to allocate sites for retail, leisure and other main town centre uses. If a proposal was for a town centre use, the applicant would also be required under the NPPF to undertake a site sequential assessment.

2. In this respect would the policy accord with other policies in the Plan, in particular policy E6, which aims to retain employment land and premises and employment opportunities?

WCC response:

1.56 It is important to read the Local Plan as a whole. It is accepted that by referring to Policy E6 in Policy WIN6 this could create confusion. In recognition of this PM 183 in the Schedule of Proposed Modifications (SD14a) has removed the reference to Policy E6 in the preamble to the policy and PM 184 has amended the wording of criterion iv (sub area 4) to exclude reference to Policy E6.

3. Should the policy address any need to align any future growth of this industrial estate with the capacity of the sewerage infrastructure?

WCC response:

1.57 PM 89 in the Schedule of Proposed Changes (SD14a) includes a proposed modification that has been agreed with Southern Water to align the future growth / changes in the Winnall industrial estate in relation to the capacity of sewerage infrastructure.

4. Would criteria adequately address the need to improve connectivity and accessibility in terms of pedestrian, cycle, and public transport links?

WCC response:

- 1.58 It is considered that the wording in criteria ii (sub area 2) which requires applicants to submit a Travel Plan would help to improve connectivity and accessibility in terms of pedestrian, cycle, wheeling and public transport links. It is also important to read the Local Plan as a whole as there is a separate topic on Sustainable Transport and Active Travel (Policies T2 – T4).

Winchester mixed use allocations

1. MIQs are included in the Inspector's stage 1 MIQs

Winchester learning and non-residential institutions allocations

Policy W10 Former River Park Leisure Centre site

1. Are there any known barriers to development, including any restrictive covenants that could delay delivery within the Plan period?

WCC response:

- 1.59 The city council acknowledges that similar to a number of other brownfield sites there are a number of matters that would need to be taken into consideration and addressed as part of the redevelopment of this site:

1.60 Covenant restriction

The freehold of this site was acquired by the city council's predecessor in a title by an Indenture in 1902. It was to be for 'the purpose of a Public Park and Recreation Ground'. However, the Purchaser was given rights that include the right to erect 'any other building or galleries for recreation, scientific or other similar purposes and the necessary lodges for keepers and caretakers or any other buildings that may be required for the benefit of the City except Industrial Dwellings'.

- 1.61 It is considered that it would be consistent with the statutory purpose for which the site is currently held to add ancillary facilities and buildings such as changing facilities, a café and community spaces for the promotion of arts and culture: the erection of new buildings for such purposes on the parts of the land which are currently laid out as open space would be lawful without the city council formally appropriating the space for other uses.

1.62 Any development outside of recreational use would require a change of use and by way of appropriation following the procedure in Section 122 of LGA 1972. Such changes would not require ministerial consent.

1.63 Flood risk

As part of the work for the Local Plan a Stage 2 Strategic Flood Risk Assessment ([BNE21](#)) was agreed with the Environment Agency. The assessment shows that due to the proximity of the site to the River Itchen, it is located within a flood risk area (Flood zone category 3) and the groundwater levels are less than a metre below the surface which are important considerations that would need to be taken into account when considering any redevelopment proposals for this site. Any redevelopment of the site would involve undertaking a specific site Flood Risk Assessment (FRA) that will be required to demonstrate that the proposed development will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall. Owing to the flood risk, the site would not be suitable for residential development.

1.64 Views

The site is located adjacent to the South Downs National Park (SDNP). Discussions have taken place with Officers from the SDNP who have provided comments on the wording of Policy W10. The supporting text acknowledges that there are views into, and out of the site, to the National Park and views of Winchester Cathedral, which are both key matters to consider when bringing forward any plans for the redevelopment of the site.

1.65 In order to support an application for the redevelopment of the site, the city council has undertaken a 3D scan of the former leisure centre in the context of the wider environment. In addition, a Townscape and Visual Impact Assessment has been undertaken which can be used to help inform redevelopment of the site. All of the above matters would need to be taken into consideration as part of the design process (Policy D1).

1.66 Scheduled Monuments

Hyde Abbey Gardens which includes the remains of Hyde Abbey, a Benedictine monastery, extends into the car park and grounds of the adjacent former Leisure centre complex. Hyde Gateway, which is located opposite St Bartholomew's Church in King Alfred's Place, and the Bridge which are Scheduled Monuments, are the only substantial remains that still remain. As the western boundary of the site is also located adjacent to the Winchester Conservation Area boundary, any development will need to take this into consideration as part of the design process (Policy D1 and the relevant heritage policies).

1.67 Access

Vehicular access is restricted off Gordon Road, off Hyde Abbey Road, both residential streets, in turn taking access off North Walls, which is part of the one-way system.

1.68 Existing uses

The site contains the outdoor skate park and the indoor bowling facility which will need to be incorporated into any redevelopment of the site.

1.69 Overall, the city council believes that the constraints on this site have been fully taken into consideration and have been addressed in Policy W10. It is important to read the Local Plan as a whole as there are a number of other policies that would need to be addressed (e.g. Policy D1). The Council considers that the site is deliverable.

2. Would the policy adequately control matters such as flood risk and the need to ascertain waste water capacity and phase development until delivery of necessary infrastructure?

WCC response:

1.70 Please see response to 1 – flood risk.

1.71 PM 100 in the Schedule of Proposed Modifications (SD14a) is agreed wording with Southern Water that will ensure that any redevelopment of the site will align with the necessary network capacity.

3. Policy W10 ix and x, states that ‘...the proposals are designed to ...’ ? In so doing would the Plan be effective? Would the policy be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?

WCC response:

1.72 Policy W10 ix requires that development proposals are designed to complement and enhance the appearance of the River Park Recreation Ground. Any redevelopment of this site would also, as part of the design process, need to provide a suitable and attractive gateway into the City. Policy W10 x requires proposals to be designed that are permeable and includes publicly accessible performance/events space that benefits the City. The city council considers that the supporting text and the policy have been clearly written and are unambiguous and the policy wording would be effective in terms of enabling a high-quality scheme that was appropriate for this site.

4. Would the site contribute to the open space/recreation space requirements in the District? And if so in what way?

WCC response:

1.73 The site is allocated for Learning and non-residential institutions classes F.1 and E (d). Proposals which come forward in-line with these uses and meet the requirements of the criteria in Policy W10 may provide access to health and well-being activities and may increase connectivity through to North Walls recreation ground but these discussions have not taken place. However, it is unlikely that a proposal would provide additional open space.

Policy W11 University of Winchester/Royal Hampshire Hospital

- 1. As the Council supports the retention and improvement of the existing hospital and university services, and at this stage the Plan does not provide indicative capacity for student or other homes, what is the purpose of the allocation of this site in the Plan?**

WCC response:

1.74 The purpose of Policy W11 is an enabling policy that supports the retention, improvement and the expansion of the hospital and university sectors. The city council believes that the policy is necessary as both of these uses offer significant employment opportunities which is the reason why Policy W11 covers a broad area of land. The city council wants to be supportive of any improvements in this area subject to meeting the requirements of Policy W11.

- 2. Would the criteria be justified and are they clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?**

WCC response:

1.75 Yes – the city council believes that Policy W11 has been clearly written and unambiguous and it is evident how a decision maker should react to development proposals.

- 3. Is there justification for policy W11 to make specific provision and allowances for instances where on-site energy generation is not sufficient to power a proposed development?**

WCC response:

1.76 The city council is aware the uses such as the hospital do require significant energy to power certain equipment such as MRI/CT scans. The city council believes that the best way to deal with matters like this is for these types of issues to be addressed as part of the masterplan(s) for the site once the plans for the any expansion/alteration to the site are known. It is also important to read the Local Plan as a whole as there a number of other policies in the Local Plan that cover renewable and low carbon solutions.

- 4. Should criteria ensure that the proposed development layout ensures future access to existing underground infrastructure for maintenance and upsizing purposes?**

WCC response:

- 1.77 Criterion vii in Policy W11 includes the requirement at the request of Southern Water that the layout ensures future access to existing underground infrastructure for maintenance and upsizing purposes.

SHUA

Policy SH1 Newlands (West of Waterloooville)

- 1. What is the evidence to support the delivery of additional dwellings at this site? Where would this take place and is clarification within the supporting text necessary for soundness? What would be the consequence on the delivery of employment uses? Would the provision of additional dwellings result in a high quality development that contributes to the needs of PfSH?**

WCC response:

1.78 Please see WCC response to, Matter 7, question 1.

1.79 The additional dwellings proposed will not impact upon the capacity of the site to deliver the employment uses – i.e. no land currently intended for employment uses is being proposed for housing.

- 2. Should the policy map be modified to reflect proposed changes?**

WCC response:

1.80 Please see WCC response to, Matter 7, question 2.

- 3. Should policy SH1 require a green infrastructure strategy and control its details to address mitigation of harmful impacts on European sites?**

WCC response:

1.81 Please see WCC response to Batch 1, Matter 7, question 3.

Policy SH4 Solent Business Park

- 1. The supporting text (paragraphs 13.34 and 13.35) includes repetition. In this regard, would the policy be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?**

WCC response:

1.82 There is some repetition between paragraphs 13.34 and 13.35. To improve the clarity and effectiveness of the Plan, it is proposed that paragraph 13.34 is deleted (PM207).

2. This is a site carried over from the extant Plan. It is envisaged that it will deliver approximately 11,000 sq m of employment floorspace. Much has been delivered on this site to date. However, what evidence justifies the delivery of the remaining within the Plan period?

WCC response:

1.83 The site has been actively promoted and meetings have been held with the promoter. A planning application 19/00852/OUT for most of the land covered by this allocation was permitted in August 2020. It has now lapsed but the application proposed over 12,800 sqm of floorspace for a variety of uses (6,796 sqm B1c light industrial, 3,024sqm hotel, 545sqm nurse, 1,605sqm gym and 856 sqm restaurant/bar). The site continues to be actively promoted and it is expected it will come forward over the plan period.

1.84 The Proposed Submission Plan states that the site is allocated for technology and business uses falling within Use Class E(g). It is recognised that a modern business park incorporates a range of uses and it is likely that a deliverable scheme will contain a range of uses in a similar way to the scheme permitted under application 19/00852/OUT. On reflection this should be recognised in the text of the Plan.

1.85 Proposed Modification PM223

1.86 New paragraph to follow para. 13.35 of the Proposed Submission Plan - The intention is to ensure that this remaining parcel is delivered in the plan period in a way which compliments and enhances the wider employment area. For this remaining parcel, a range of uses compatible and complimentary to the business park will be considered as a way of ensuring delivery of the site and supporting the overall attractiveness of the employment areas for all occupiers.

1.87 Proposed Modification PM224

1.89 Amend criterion i of Policy SH4 as follows

i. Provide for a range of high technology and business uses falling within Use Class E(g); **Provide for a range of business uses falling within Use Class E(g), B2, B8, and other employment generating uses. In addition, a limited amount of appropriate ancillary commercial uses within the broader Use Class E are also supported subject to other policies in this plan if they contribute to the amenity, sustainability and vibrancy of the Business Park;**

1.90 Proposed Modifications -

1.91 Consequential amendments to the site summary on page 381 of the Proposed Submission Plan (PM226), and revisions to Table C on page 264 of the Proposed Submission Plan (PM225), to reflect a reduction of the anticipated yield of employment land from 4ha to 2ha, and for it have no particular prescription, rather than expected to be Offices. This will reduce the overall anticipated yield of employment land from the sites allocated in the Plan to 37.36ha. This still

falls within the upper end of the range of need identified in the Employment Land Review, and given that there is additional windfall development expected over the plan period, the allocations, together with the anticipated windfall development, are considered sufficient to meet the identified needs.

3. What is the justification for the use classes to be provided, height of buildings and a minimum of around 30% of the site to constitute parkland? Would it provide the necessary flexibility to ensure the amenity, sustainability and vibrancy of the Business Park?

WCC response:

- 1.92 The standards sought regarding height of buildings and parkland have been retained from the adopted plan, and continue the approach which guided the previous phases of development. These were considered and decided as part of the masterplanning and planning applications process for Whitely Business Park as a whole and were considered appropriate. Since then, the business park has been delivered over many years through a succession of phases. A high quality environment has been created with parkland incorporated in throughout the development and a consistency of appearance and approach to the layout and scale of buildings. This approach has proved to be attractive to the market and a significant amount of floorspace has been delivered.
- 1.93 The land in allocation SH4 constitutes the last element of the business park to come forward. It is well related to the remainder of the business park and it is important that the layout and design is integrated with the rest of the park to retain the high quality environment achieved to date and to continue to attract occupiers. It is in a prominent location in the business park, bounded on three sides by the key routes of Parkway and Whiteley Way.
- 1.94 Whilst national policy and Local Plan policy D1 provide a framework for considering the design of proposals, it is appropriate for the Local Plan allocations to set out clear guidance on site specific matters considered important, in this case the consistent application of an approach to the layout and scale of buildings across the business park. The policy does provide flexibility. Building heights should *generally* avoid being over three storeys or 14 metres in height (criterion iii), and parkland should constitute as a minimum *around* 30% of the site area (criterion iv). Therefore criteria ii and iv are justified and provides all parties with clear guidance on what would be considered appropriate.
- 1.95 Proposed Modification PM224 set out above seeks to revised the use classes sought on this site, in recognition of the need for flexibility.

Policy SH6 Botley Bypass (not an employment allocation)

- 1. This policy aims to safeguard land to deliver the Botley bypass. In doing so, would it ensure protection of the countryside, Protected Sites and ensure access to underground infrastructure?**

WCC response:

1.96 Planning Permission for the Botley Bypass was granted on 22 November 2017 (Application No: CS/17/81226) and was granted in respect of the plans and particulars put forward under the planning application. Work has started on implementing this proposal as part of a nearby residential development in terms of clearing the vegetation.

1.97 As this development is not yet complete it is appropriate to retain this policy in the Plan, which is carried forward policy SHUA5 from Local Plan Part 2. It is considered that the policy, together with other policies in the Plan, ensures the countryside and protected sites are given appropriate protection.

1.98 However, a response was received from Southern Water at the regulation 19 consultation regarding the need to ensure measures are included to protect and ensure future access for maintenance and upsizing purposes to Southern Water's water supply infrastructure, and so proposed modification PM108 is intended to clarify and confirm that.

MTRAs

Market Towns

Bishop's Waltham

Policy BW3 Tollgate Sawmill

- 1. Would BW3 paragraphs 14.15 and 14.17 result in repetition? In this regard, would the policy be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?**

WCC response:

2.1 The city council believes that paragraph 14.15 which sets out the existing position regarding GP premises in Bishop Waltham is clear and unambiguous. Paragraph 14.17 was included in the Local Plan following discussions with the Integrated Care Board (ICB) as they specifically wanted text included in the Local Plan that signposts the reader to the Infrastructure Delivery Plan and the need to make early contact with the ICB. Taken together these paragraphs set

out the existing situation and the need for early discussions to take place with the ICB in the case of residential development coming forward as part of the development of this site.

2. Would policy BW3 ensure protection of the setting of the South Downs National Park and appropriately address the need to promote sustainable transport infrastructure options?

WCC response:

2.2 It is also important that the Local Plan is read as whole as there are a number of other policies in the Local Plan such as Policy D1 (High Quality, Well Designed and Inclusive Places), Policy NE8 (South Downs National Park), Policy NE9 (Landscape Character) and Policies T1 – T 4 (Sustainable and Active Travel).

2.3 However, the Council does consider that criterion viii of the policy could be strengthened to ensure that the boundaries of the site are protected and reinforced to protect the minimise any wider views and protect the setting of the South Downs National Park. Proposed Modification PM111 amends criterion viii accordingly and Proposed Modification PM112 includes the boundary of the South Downs National Park in the allocation and inset maps to assist in its interpretation.

3. Given that this site is carried over from the extant Local Plan, what is the evidence that it will be delivered with in this Plan period?

WCC response:

2.4 The delivery information for this site allocation has been set out in response to Matter 5. In this particular case, although delivery information was received from an agent who was acting for the site in 2023, since then we have been advised that there is no agent acting for the site and further work is being undertaken to ascertain the owner of the site.

2.5 Partly in response to concerns about the delivery of this site, this revised allocation seeks to help bring it forward by broadening the range of uses are included in the policy. The Council also mindful that the site has been vacant for some time and has been subject to trespass and there are concerns regarding safety and security leading to the Council itself fencing off the site entrance to deter further incursions. In addition, it is the case that if this site were not to come forward, or doubts to remain regarding its delivery, then the nature and scale of the development, (up to ten dwellings and 2.2 ha of employment land) means that there would not be a need to revise the allocations in Bishop's Waltham to make good that amount, given the small amount of residential development, the overall supply of employment land exceeding the identified need across the district, and the role of proposed Policy

E9 to allow further employment land to come forward in response to local needs. For these reasons, given the potential public benefit in the site coming forward, it is thought appropriate to retain the allocation.

4. This site is being brought forward for employment purposes, given its existing commercial use. On the basis of the potential provision of a GP surgery and market housing, limited to ensuring viability of the employment element, what is the evidence that underpins the policy's indicative capacity and its delivery in 2029/30?

WCC response:

2.6 The total size of the site is 2.6ha. The site is allocated in the adopted local plan for employment uses, with a limited amount of residential development included with the intention of helping to assist viability and bring the site forward.

2.7 Policy BW3 broadens the potential uses which could come forward on the site to include a health and medical facility should there be an operational need for the existing GP surgery in Bishop's Waltham to relocate from its existing premises. There is no certainty that a health facility will be required in this location, given the potential for the surgery to relocate elsewhere, and the lack of any agreement with landowner of this site. But the policy includes the potential for a medical facility in light of the need for a new site and it is thought that broadening the range of uses will may assist in bringing the site forward. Following discussions with the local GP practice, it is understood they would be seeking a site of some 0.6ha for a relocated surgery.

2.8 In summary, the policy seeks 2.2 ha of employment land to be delivered on this 2.6 ha site. If a health facility is located there it is envisaged that it would take up approximately 0.6ha of that 2.2 hectares. The limited residential component of up to ten dwellings is envisaged to be delivered on the remaining 0.4ha. The exact disposition of uses would need to be established by a masterplan required by the policy.

2.9 The Council has further considered the likely timing of this site coming forward. In recognition of the lack of progress the revised housing trajectory places the delivery of ten dwellings associated with this site in 2031/2032.

New Alresford

Policy NA2 Sun Lane

1. Would the policy be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?

WCC response:

2.10 Please see response to Policy NA2, question 1 in Matter 8.

- 2. Would it appropriately address the requirements of offsite infrastructure, impacts on the Groundwater protection Zone and promote active travel and enable its infrastructure?**

WCC response:

2.11 Please see response to Policy NA2, question 1 in Matter 8.

Intermediate rural settlements

Waltham Chase

Policy WC1 Morgan's Yard

- 1. What is the status of the Shedfield Village Design Statement?**

WCC response:

2.12 The Winchester City Cabinet (Local Plan) Committee adopted the Shedfield Village Design Statement as a Supplementary Planning Document at their meeting of 29 February 2016. The document is available on the City Councils website.

- 2. Given constraints around the village including the narrow gap with Swanmore and existing commitments and extant allocations, no new allocations are proposed. Notwithstanding that policy WC1 is an existing allocation in an extant Plan, what is the evidence to justify residential development on this existing employment site?**

WCC response:

2.13 Morgans Yard was granted planning permission (21/02439/FUL) on 03/12/2024 for 80 dwellings, 716sq.m of Class E commercial space comprising Class E(c) - (financial and professional services), E (e) (medical or health services) and E (g) (uses which can be carried out in a residential area without detriment to its amenity including industrial processes), related vehicle access from Solomons Lane (residential) and Winchester Road (single access to serve 8 properties, and commercial), separate pedestrian/cycle access from Winchester Road, open space and play space, landscaped buffer to Waltham

Chase Meadows Site Scientific Interest (SSSI), parking, landscaping and drainage infrastructure.

- 2.14 As part of the planning application, the potential loss of employment land was assessed and it was acknowledged at the time of assessing the planning application that the redevelopment of the site would bring forward uses that were more compatible with residential use of the site in terms of noise, odour and dust to the benefit of occupiers of Rose Cottage.

3. Plan policy WC1 requires employment generating uses to replace some of the existing jobs on the site. In so doing would the policy be effective? Would it be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?

WCC response:

- 2.15 Please see response above. The city council believes that the policy would be effective and it is clearly written and unambiguous and it is evident how a decision maker should react to development proposals.

4. What is the evidence to justify its delivery in 2027/28? Given contamination constraints what is the evidence that this site would be viable for the type and capacity of development envisaged?

WCC response:

- 2.16 Morgans Yard has been granted full planning permission and as part of that planning permission an independent viability assessment was assessed and it was demonstrated that the site was deliverable. Since permission was granted the site has begun to be vacated by the previous occupiers. Application 24/02742/DIC for the discharge of conditions 1-11a (which includes a ground contamination remediation strategy) was received on 11 December 2024 and is currently being considered. Application 24/02767/NMA for a non-material amendment which approved a Demolition Plan and Construction Phasing Plan was approved 17 January 2025. There is clear evidence that the development is proceeding and that delivery will be complete in 2027/28.

5. Would Plan policy WC1 be effective in its requirements for off site infrastructure?

WCC response:

- 2.17 Whilst the site has planning permission, development has not yet been completed. The Integrated Care Board made a representation regarding potential impacts upon primary care services, and in line with other allocations in the Plan it is considered appropriate for the policy to recognise (in the event of a further planning application coming forward on this site) that those potential

impacts will need to be considered. Proposed Modification PM159 adds a criterion to Policy WC1 to make that clear.

Strategic Policy E3 Town centres strategy and hierarchy

- 1. The town centre hierarchy, boundaries and primary shopping areas are justified by the Retail and Town Centre uses Study 2020 and the Employment and Town Centre Uses Study 2024 [VE02,03, 05 and 06]. Together, would they provide the robust evidence to justify the Plan's approach in this regard and would it accord with NPPF paragraph 90d?**

WCC response:

- 2.18 The 2020 and 2024 studies look at a range of issues relating to town centre policy and the matters specified in paragraph 90 of the NPPF. These include the hierarchy of centres, and town centres boundaries and primary shopping areas as well as producing capacity forecasts for retail and other main town centre uses. To take account of the full range of evidence provided by these studies they should be looked at together. The table at p273 of the Plan sets out the issues covered by the 2020 and 2024 studies respectively. The evidence base documents are –

2020 Retail and Town Centre Uses Study 2020 Main Report and Appendix A ([VE05](#))

2020 Retail and Town Centre Uses Study 2020 – Appendices B and C ([VE06](#))

2024 Town Centre Uses Study ([VE02](#))

2024 Town Centre uses Study Appendices ([VE03](#))

- 2.19 The 2020 Study considered the appropriateness of the hierarchy of town centres within the plan area, concluding that they are broadly appropriate (page v, para. 37). The 2024 Study reviews the local centres identified in the existing Local Plan. (paras 7.29 – 7.39). No changes are recommended at this stage but a comprehensive review is suggested in any subsequent review of the Local Plan when the composition of the retail and town centre uses provided as part of the larger scale residential developments is known. This is reflected in para 10.64 of the Plan.

- 2.20 The existing boundaries for defined centres and primary shopping areas were also reviewed as part of the studies. The 2024 study recommends a review of the Stockbridge Road/Andover Road local centre boundary to reflect recent development in the area (para 7.8).

- 2.21 The 2024 also advised that the proposed Primary Shopping Areas were appropriate given the findings of the health check assessments (paras 7.9 – 7.11).

- 2.22 The 2020 Study found that the previous primary shopping frontages and secondary shopping frontages should form the primary shopping areas (PSA) and that references to frontages be removed to reflect changes in the 2018 NPPF. The 2020 Study recommended that the PSAs should be defined in respect of the whole of the properties associated with the previously defined primary and secondary shopping frontages (paragraphs 9.5-9.12 and table 9.1 refer). This was confirmed in para 7.9 of the 2024 Study.
- 2.23 It is proposed that the policies map be re-drawn to reflect these findings and PM163 and PM166 of the policies map (SD14c) refer.
- 2.24 Paragraph 90(d) of the NPPF requires that planning policies should allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead, with meeting the anticipated needs not to be compromised by limited site availability, so town centre boundaries should be kept under review.
- 2.25 The 2020 and 2024 studies seek to provide evidence on the scale and type of main town centre uses likely to be required over the Plan period, looking at both district-wide capacity and requirements by centre. The studies adopt a transparent 'step-by-step' approach in accordance with accepted practice to forecast quantitative floorspace requirements for retail uses.
- 2.26 The latest forecasts are provided at Tables 4.3, 4.4 and 4.5 of the 2024 Study. Given that the scale of identified capacity is small it is considered that the need can be met by minor changes to existing floorspace, the reoccupation of vacant space, changes of use within Class E and the provision of small scale Class E floorspace in new mixed-use development. There is therefore no requirement to identify larger comprehensive development opportunities.
- 2.27 The studies also considered the need for additional floorspace for leisure and other main town centre uses needs based on consumer and market trends, existing provision and the role, function and health of existing centres.
- 2.28 Given the dynamic nature of the leisure sectors, commercial thresholds for entry and uncertainties regarding the type of space required, the studies conclude that allocating new sites for specific types of development is not appropriate and the reoccupation of existing floorspace or inclusion as part of mixed use schemes should be encouraged. Provision for new town centre use development is allowed for as part of the mixed use allocations in Central Winchester (Policy W7) and Station Approach (Policy W8).
- 2.29 In the light of this advice it is considered unnecessary to allocate additional sites within defined town centres for retail, leisure, office and other main town centre uses.
- 2.30 The council therefore consider that the approach to town centres and retail uses is based on an up-to-date evidence base, that takes account of current and predicted trends over the plan period. The studies of 2020 and 2024 both provide a sound basis on which the plan to provide for forecast needs for town

centre uses and evidence for appropriate strategies for the main centres of the district.

2. Would the additional need for 395 sqm additional convenience floorspace and 741 sqm additional comparison floorspace over the Plan period be justified by robust evidence?

WCC response:

2.31 These floorspace figures are the forecast capacity for 2040 as set out in the 2024 Study. They have been derived using a transparent and standard approach and as such are considered to be robust forecasts at the present time, although it has to be acknowledged that the reliability of any forecast decreases the further ahead one looks.

2.32 The NPPF requires planning policies to look at least 10 years ahead. However, the PPG recognises the uncertainty in forecasting long-term retail trends and consumer behaviour, and suggests any assessment may need to focus on a limited period (such as the next five years) and be regularly reviewed. The Local Plan will be subject to an immediate review, which can update forecasts and consider any new national policy guidance.

2.33 As a result, the absolute forecasts of 395 sqm of additional convenience floorspace and 741 sqm of comparison by 2040 need to be treated with a degree of caution.

2.34 However, given the on-going impacts on household spend, increasing online shopping and need for existing businesses to increase sales efficiencies to offset increasing business overheads, it is considered unlikely that there will be a significant uplift in demand to support new floorspace in the foreseeable future. Moreover, the capacity assessment also suggests that the highest requirements are in 2029 (516 sqm convenience and 1,401 sqm comparison) after which capacity will decline as online sales grow and sales efficiencies improve for existing businesses.

2.35 The forecast figures for additional convenience and comparison floorspace do not include any allowance for the reoccupation of vacant space, which exceeds 7,000 sqm gross in Winchester City Centre alone. It therefore does not follow that the identified 'need' should be met by the allocation of new development sites.

2.36 The table on page 274 of the Proposed Submission Plan includes typographical errors on the column headings. Therefore a Proposed Modification (PM227) is suggested to amend the headings to the correct reference.

3. Would the bullet pointed list at paragraph 10.53 in listing policies in an extant Plan be clear and unambiguous in its intentions?

WCC response:

2.37 Paragraph 10.53 of the Local Plan sets out the findings from the 2024 study and in this respect is required. Paragraph 10.51 refers to the 2020 study and this is equally considered to be important as there is work in the 2020 study that was not updated in the 2024 study as set out in the table on page 273. (for example, the 2020 study includes the results of household telephone survey). The wording of paragraph 10.53 is therefore considered to be clear and unambiguous in its intentions.

4. The Plan would not provide for any specific leisure or other town centre uses outside retail. It states that, given the small need identified it should be met through town centre regeneration/ redevelopment sites, and through changes of use between different town centre uses. In doing so would the Plan have a justified approach to town centres and retail uses?

WCC response:

2.38 The study points out that forecasting retail needs is unreliable beyond 10 years and – as recommended by national guidance – the situation should be kept under review.

2.39 Forecasting the need for new leisure uses is more problematic than for retailing as the sector is highly complex and dynamic. Thus, whilst the 2020 and 2024 Studies identify increased available expenditure on leisure over the Plan period, with much of this expected to be spent on Food & Beverage, there is considerably less certainty as to whether this increase in potential spend will be met by an increased demand for physical floorspace, or the types of uses that will attract spend.

2.40 Recent experience has also shown that leisure and other main town centre uses can often be accommodated in repurposed or flexible retail space.

2.41 This, combined with the flexibility offered by the introduction of Class E and ‘market-led’ nature of the sector means that allocating sites now to meet unknown demand for specific uses in the future is not appropriate. Instead the Study acknowledges that the regeneration schemes on large sites should provide for a flexible range of uses. This reflects the need for an expanded range of activities beyond retail alongside the traditional retail provision. The exact composition of the planned regeneration schemes has not yet been finalised and could accommodate more retail floorspace if demand exists.

2.42 This is considered a sound approach that provide for future needs to be met in accordance with a sequential approach to development, whilst allowing for flexibility regarding specific uses on sites.

5. Would the strategy provide the necessary flexibility for uses within town centres to maintain and enhance their viability and vitality?

WCC response:

2.43 Policy E3 is a strategic policy which sets out the key principles for developments within town centres. The Policy is not prescriptive regarding uses, rather, it sets out the principles that decision makers will take into account when assessing proposals in points i) – v) and reflects the flexibility in use now provided under the 2020 Use Classes Order and specifically Class E.

2.44 Although various examples of uses are given, the nature of developments being proposed will be the key criteria. The aim is not to be inflexible, as long as activities and uses serve the purposes of the policy as set out in i) to v). These are activities and developments that would provide a service for visitors and the public, to enhance the evening, nighttime and visitor economy, that enhance the quality of the local environment – including the historic environment and improvements to the public realm. This is all within the overall aim to enhance the vitality and viability of the district's centres.

2.45 The policy encourages residential and commercial development to locate above ground floor level and also directs retail development to locations within Primary Shopping Areas where these exist. These variations also fit within the aim of enhancing vitality and viability, as they seek to maintain active street frontages and concentrate retail and other key shopping activities within a focussed area, where the businesses will benefit from linked trips which will enhance the viability of these business and the vitality of the centre as a whole.

6. Would the policy wording be clear and unambiguous so as to accord with NPPF paragraph 16?

WCC response:

2.46 Policy E3 is a strategic policy which sets out the key principles for developments within town centres and a hierarchy of scale of centres, including Primary Shopping Areas. The policy sets out how the identifies need for retail and main town centre uses will be met, which includes developments within the site allocations of the plan as well as by the approval of new development within town centre boundaries (where it complies with the aims of the strategy).

2.47 The strategy sets out what uses are likely to be appropriate – the main town centre uses as defined in the NPPF and other uses that are aimed primarily at visiting members of the public and add to the vibrancy and attractiveness of centres and provides some examples. E3 provides key principles against which proposals should be assessed (i) – v).

2.48 Policy E3 also makes it clear that notwithstanding if proposals are an appropriate use for a town centre, they also need to be appropriate for the site's location in the hierarchy and the scale and impact of the proposals. It further expands that there are Primary Shopping Areas within particular named centres and that retail development will be directed to these Areas where they exist.

2.49 The descriptions of the types of activities and uses that may be acceptable and their purpose will provide guidance for the assessors. The town centre

hierarchy set out in the policy will assist decision makers with the assessment of proposed developments.

2.50 The level of detail is considered suitable for a strategic policy and the council considers that the policy wording is clear and unambiguous in this and suitably directs decision makers to Policy E7 for more detailed criteria for proposals within town centre boundaries and Primary Shopping Areas.

Strategic Policy E4 Main town centre uses out of centre

1. Would strategic policy E4 appropriately apply the sequential test in relation to development of main town centre uses which are neither in an existing centre nor in accordance with an up to date plan? Would the requirements of a sequential approach be clear and unambiguous?

WCC response:

2.51 The first paragraph of Policy E4 sets out the sequence in which potential development sites will be considered, following the approach set out in NPPF paragraph 91. It is not considered necessary to repeat all of the detail of the Framework in the Local Plan policy.

2.52 The policy clearly states that applicants are required to demonstrate why their proposal could not be accommodated in a sequentially preferable location and sets out the sequential order in which sites will be considered.

2.53 Para 10.88 elaborates on the factors that the council will take into consideration i.e. the nature of the proposed use and any specific format or locational requirements that may apply. The majority of applications will be for retail or large-scale leisure developments' however, a modification could be considered for this paragraph, to refer instead to 'retail and other main town centre uses' to reflect the requirements of the NPPF and Policy E4.

2.54 The policy states that local facilities or services will generally be acceptable outside of centres, and sets out in 10.91 how this will be interpreted. The reference to a particular size of unit and nature of service being considered a local facility or service where Policy E8 will apply is considered useful in the application of the policy.

2.55 There is no lower threshold for sequential assessment of proposals, however, 10.89 invites applicants to agree the scope of the sequential test in advance of submitting any planning application so that the test can be applied in a reasonable and proportionate manner.

2.56 The council therefore considers Policy E4 to be clear and unambiguous in its requirements in relation to the sequential approach, whilst having due regard to the need for flexibility and reasonableness.

2. Would the threshold for an impact assessment for retail and leisure development be justified by robust evidence and accord with NPPF 94? Would it provide an effective mechanism to assess the impacts on existing town centres of smaller retail stores and changes within edge and outside defined town centres?

WCC response:

2.57 The proposed impact threshold of 350 sqm gross is based on advice in the 2020 Study (para 9.17 onwards) and reflects concerns regarding the cumulative effect that incremental changes may have on smaller centres.

2.58 It is considerably lower than the 2,500 sqm gross threshold set out in the NPPF and lower than that currently set out in the adopted Local Plan. However, the 2020 Study considered that the cumulative effect of smaller retail and leisure developments or changes of use may not be adequately considered without a lowering of the threshold.

2.59 The proposed 350 sqm threshold would allow for small scale retail provision (e.g. a small convenience store) to come forward without the need for an impact assessment but other proposals would be required to submit information on expected impacts albeit the level of detail included within a RIA should be proportionate to the scale and type of retail floorspace proposed and should be agreed between the Council and applicant on a case-by-case basis. It is therefore considered that this an effective approach to the consideration of impacts.

3. Would strategic policy E4 strike the right balance between protecting and enhancing the viability and vitality of the main town centres, and providing for small scale retail and leisure developments which provide a local facility/service on the edge and outside defined town centres?

WCC response:

2.60 Policy E4 generally applies the sequential test to prevent edge or out of centre retail and leisure developments to protect the viability and vitality of the main town centres. However, small scale retail and leisure developments (and other town centre uses) can provide a useful local facility/service and these may be the edge or outside of defined town centres.

2.61 Accordingly, Policy E4 seeks a proportionate approach to the sequential test and sets out in 10.91 that such local facilities and services will be considered favourably (as is also in E8). Paragraph 10.91 sets out what will be taken into consideration, when assessing whether a proposal could be considered a local facility or service and thus – subject to compliance with other policies of the plan – be considered acceptable on the edge of or outside of the defined centres.

4. What is the clear justification to restrict permitted development rights, as set in the supporting text to the policy (paragraphs 10.98 and 10.99)? Would it accord with NPPF paragraph 55?

WCC response:

2.62 The city council believes that it should be paragraph 54 of the 2023 NPPF (not paragraph 55). Paragraphs 10.98 and 10.99 are in the supporting text and not the policy so in this respect, it is considered that the wording of this paragraph would accord with paragraph 54 as it does state 'where it is necessary and reasonable to do so'.

Policy E5 Enhancing employment opportunities

1. Policy E5 confirms that employment development will be supported within settlement boundaries and sets out what the Plan considers to be employment uses. Would the uses defined within policy E5 at i-iii appropriately reflect the employment base in the District such as academic institutions, health etc?

WCC response:

2.63 E5 provides support for new development, or re-development, of land and buildings for employment uses within the industrial and office use classes. Although they have employment benefits, the primary consideration for the assessment of proposals for healthcare development will be their wider societal benefits and the Plan strategy, rather than economic, or employment land policies. Similarly, proposals that involve academic institutions will be considered in regard to the activities likely to take place in these locations such as learning etc. These activities are likely to be unique and may require a bespoke response which E1 (and other general policies of the plan) would allow for.

2.64 Policy E5 recognises in the supporting text at 10.92 and 10.93, that there are a wide range of activities that generate employment, that do not fall within this definition, however Policy E1 provides support for activities that support the economy of the district generally, so it is not considered that the plan is restrictive in this respect.

2.65 Some of the uses referred to, such as academic institutions, health, retailing, can be accommodated in a variety of locations, including town centres. Indeed, they may often be better situated in such locations and Policy E3 provides support for this within centres.

2.66 It is not considered that specific reference needs to be made to these uses within Policy E5 as all applications will be treated on their merits and the plan needs to be read as a whole, where other policies may be more relevant consideration in respect of these uses.

2. Would the policy wording be clear and unambiguous, so it is evident how a decision maker should react to development proposals?

WCC response:

2.67 Yes. It is considered that the wording is clear and unambiguous and will provide an appropriate framework for planning decisions.

Policy E6 Retaining Employment Opportunities

1. Would policy E6 work to restrict the redevelopment of outdated employment sites/floorspace for modern employment purposes?

WCC response:

2.68 It is not considered that the policy would work to restrict the redevelopment of outdated sites. E6i) allows for a variety of forms of redevelopment of existing employment sites for new employment purposes. The criteria lists various forms that this might take including, intensifying use and 'the potential to improve and extend the range of modern employment floorspace'. E6i) also begins with the phrase 'The redevelopment potential'.

2.69 The council therefore consider that E6 provides for the redevelopment of outdated employment sites/floorspace for modern employment purposes as currently worded.

2. What is the robust evidence to justify a marketing period of 12 months to support the loss of employment land and floorspace?

WCC response:

2.70 The 12 month period for marketing a property is considered to be justified and appropriate and it has been accepted by a number of Inspector's including the Fareham Borough Council Local Plan examination and at planning appeals as a reasonable period of time to demonstrate that there is no interest for a particular use. It is considered that anything less than 12 months would generally not be robust. The 12month marketing period would need to demonstrate that it had been marketed at the right price, in appropriate locations and publications. This includes both sale and let, as either could be a way to get the building back into/keep it in an employment use. The supporting text at 10.107 and 10.108 provides further information as the evidence that will be required and will be applied in a proportionate manner. Where there are special circumstances that mean that it is unlikely that an alternative employment use would be forthcoming, applicants would be able to make a reasonable case for an exception.

3. Would the policy wording be clear and unambiguous, so it is evident how a decision maker should react to development proposals?

WCC response:

2.71 Yes. It is considered that E6 appropriately sets out how proposals should be considered in relation to their economic benefit in the first instance, whilst also providing flexibility for the consideration of other benefits of the proposed scheme.

4. How would this policy interact with strategic policies E1, E2, E3 and E4? Together would they be effective in meeting the economic development needs of the District?

WCC response:

2.72 E1 sets out the economic strategy for the district. E2 sets out the site allocations. E3 sets out the town centre strategy for the district. E4 sets out the council's approach to the sequential test.

2.73 Together, these policies allow for a variety of employment development within the district as a whole. E1 particular stresses this by setting out the wide variety of development that will generally be supported. E3 is similarly supportive of a variety of uses within town centres. The justifications for E1 and E3 set out how these policies appropriately provide for the required needs for economic land illustrates how the site allocations provide for a wide variety of types of economic development, including for a mixture of uses and employment generating development that may not fall within the traditional industrial or office use classes.

2.74 Taking this into account however, it is considered appropriate that specific policies additionally set out where particular circumstances apply – such as for proposals for town centre uses in out of centre locations (E4). The need for a specific approach that varies from the general policy approach set out in E1 (and E5 and E6) is also required for certain sites as set out in the particulars for sites in E2, including the area at Winnall (W6).

Policy E7 Maintaining the vitality and viability of town centres

1. Would policy E7 be clear and unambiguous in relation to its requirements for viability and marketing assessments?

WCC response:

2.75 The purpose of the Policy E7 is to support the retention of existing retail and other town centre uses and resist their loss to other uses where possible. There are some cases where the loss of a site or part of a site to another use will be necessary, however given the importance of these areas as key areas of economic activity within the district, it is considered appropriate for the applicant

to demonstrate that all other forms of economic uses have been considered and the reasons why the site is considered unsuitable for its current use.

2.76 It is accepted that the current wording of E7 may not make it clear where assessments will always be required and amendments are therefore proposed to the text to clarify the situation and differences within the Primary Shopping Areas (PM67 refers).

2.77 At the bottom of the Policy E7 it sets out the requirements regarding viability and marketing (12 months). The 12 month period for marketing a property is considered to be justified and appropriate and it has been accepted by a number of Inspector's including the Fareham Borough Council Local Plan examination and a Development Management appeals as a reasonable period of time to demonstrate that there is no interest for a particular use. It is considered that anything less than 12 months would not be robust. The 12 month marketing period would need to demonstrate that it had been marketed at the right price, in appropriate locations and publications. This includes both sale and let, as either could be a way to get the building back into/keep it in an employment use.

2.78 Whilst a Viability Assessment has been undertaken alongside the Local Plan it is not possible to test the requirements of Policy E7 so hence why it is considered necessary that if a proposal comes forward for an alternative use it is accompanied by a specific viability assessment.

2. What is the clear evidence to justify a marketing period of 12 months to support the loss of employment land and floorspace?

WCC response:

2.79 The 12 month period for marketing a property is considered to be justified and appropriate and it has been accepted by a number of Inspector's including the Fareham Borough Council Local Plan examination and a Development Management appeals as a reasonable period of time to demonstrate that there is no interest for a particular use. It is considered that anything less than 12 months would generally not be robust. The 12 month marketing period would need to demonstrate that it had been marketed at the right price, in appropriate locations and publications. This includes both sale and let, as either could be a way to get the building back into/keep it in an employment use. Evidence will be sought in a proportionate manner. Where there are special circumstances that mean that it is unlikely that an alternative employment use would be forthcoming, applicants would be able to make a reasonable case for an exception.

3. What is the clear justification to restrict permitted development rights, as in the supporting text to the policy (Plan paragraph 10.119)? Would it accord with NPPF paragraph 55?

WCC response:

2.80 The city council believes that it should be paragraph 54 of the 2023 NPPF and not paragraph 55 of the NPPF. Paragraph 10.119 is in the supporting text and not the policy so in this respect, it is considered that the wording of this paragraph would accord with paragraph 54 as it does state 'where it is necessary and reasonable to do so'.

Policy E8 Local shops, services and facilities

1. How would policy E8, which aims to provide for and retain essential local services and facilities within rural areas, be effective in its aim and would its approach be justified?

WCC response:

2.81 Policy E8 seeks to supports new, extended and improved facilities and it also sets out the city council's approach regarding the potential loss of local services and facilities and the steps that an applicant would need to go through if a proposal came forward to an alternative use. In view of this, the city council believes that the aims of the policy would be effective and the approach would be justified as the Local Plan needs to support existing businesses and the ensure that the loss of a local facility is fully justified through appropriate evidence.

2. Would the supporting text be clear, unambiguous, avoiding unnecessary repetition? (Plan paragraphs 10.131 and 10.134)?

WCC response:

2.82 The city council believes that the supporting text is clear, unambiguous and avoids unnecessary repetition as it supports Policy E8. Paragraph 10.134 sets out some examples of the essential facilities and services that may need to be located outside of settlements, as referred to in the preceding paragraph 10.133.

3. In defining 'pubs' as a town centre use as in Plan paragraph 10.135, would the policy support the retention of public houses in rural areas, in accordance with NPPF 88d? Would there be a conflict with Plan paragraph 10.131 in this regard?

WCC response:

2.83 It is considered that the policy should be clarified to support local facilities

2.84 Suggested PM208:

Any proposals for new Shops, pubs, arts and cultural services and facilities that attract visiting members of the public that serve more than a local catchment and attract visiting members of the public from a wider area which should be located with regard to **in accordance with** the town centre hierarchy of (Strategic Policy E3) and **the** detailed considerations set out in Policy E4. These ~~uses~~ **proposals** are not generally appropriate within the countryside, due to their traffic implications and impacts on the rural character.

Policy E9 Economic development in rural areas

1. Policy E9, in its supporting text, includes provisions that include policy. E.g. Policy E11 paragraph 10.179, 'that applicants should...large scale developments such as hotels should be situated... ', paragraph 10.180 '...proposals should ...', paragraph 10.181 applicants should...'. Should such provisions be included within policy text? Where they repeat criteria in policy text would they introduce unnecessary repetition so as to be impact on effectiveness?

WCC response:

2.85 The council considers that supporting text to E9 serves a purpose as it gives explanation for the policy itself and therefore provides justification for it. The council also considers that cross referencing to other parts of the plan will be helpful to applicants by drawing their attention to matters that may be of particular importance for proposals for rural economic development. Therefore, the council considers that some repetition is necessary to add to the effectiveness of the policy.

2. What is the clear justification to restrict permitted development rights, as set in the supporting text to the policy (Plan paragraph 10.119)? Would it accord with NPPF paragraph 55?

WCC response:

2.86 The city council believes that it should be paragraph 54 of the 2023 NPPF (not paragraph 55). Paragraph 10.119 is in the supporting text and not the policy so in this respect, it is considered that the wording of this paragraph would accord with paragraph 54 as it does state 'where it is necessary and reasonable to do so'.

3. Would the policy wording be clear and unambiguous, so it is evident how a decision maker should react to development proposals?

WCC response:

2.87 The City Council believes that the wording of Policy E9 is clear and unambiguous. E9 firstly sets out the primary consideration for developments outside of settlements and then provides a clear list of circumstances under which economic development outside of settlements may be supported.

Policy E10 Farm diversification

1. Would policies E9, E10 and E11, together, strike the right balance between supporting rural based businesses and recognising the intrinsic character and beauty of the countryside?

WCC response:

2.88 Policies E9, E10 and E11 provide support for proposals for economic diversification, farm diversification and visitor related development in the countryside, whilst also having regard to the potential impact on the rural character and natural environment of any development. The policies and their supporting texts refer to the need to respect the rural character and natural environment when considering proposals for economic development, and refer applicants to specific policies of the plan where this is considered appropriate.

2.89 The Plan should be read as a whole, and the city council considers that policies E9, E10 and E11, when taken together with policies in the Natural Environment chapter (NE9, NE14 and others), do strike the right balance between supporting rural based businesses and recognising the intrinsic character and beauty of the countryside

Policy E11 Visitor Related Development within the Countryside

1. The policy in its supporting text includes provisions that include policy. E.g. Policy E11 paragraph 10.179, 'that applicants should...large scale developments such as hotels should be situated... ', paragraph 10.180 '...proposals should ...', paragraph 10.181 applicants should...'. Should such provisions be included within policy text? Where they repeat criteria in policy text would they introduce unnecessary repetition so as to be impact on effectiveness?

WCC response:

2.90 A response to the general point regarding repetition and the balance between policy and text is provided in the response to question 1, Policy E9 above.

2.91 The council considers that the specific paragraphs referred to in the question provide more information as to points within the policy itself and justify why requirements regarding re-use of rural buildings (10.180) and the location of large scale hotels (10.179) are within the policy. The council considers that the text at 10.181 (additional benefits of proposals) provides helpful guidance to

applicants, in the interests of a positive approach to the consideration of planning applications.

2.92 Therefore the council consider that any repetition in the text is necessary and improves the effectiveness of Policy E11.