

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

Winchester employment allocations

Policy W5 Bushfield Camp

Statement on behalf of the Save Bushfield Campaign (SBC), representing the following groups and organisations:

Badger Farm and Oliver's Battery Residents Association
Badger Farm Parish Council
Compton and Shawford Parish Council
Oliver's Battery Parish Council
Otterbourne Parish Council
Twyford Parish Council
City of Winchester Trust
Winchester Action on the Climate Crisis (WinACC)
Cllr Sue Cook
Cllr Brian Laming
Cllr Jan Warwick

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Total wordcount below: 3,216
Inspector's questions: 219
Statement wordcount: 2,997

Question 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?

Policy D5 refers to Masterplans/concept masterplans but does not distinguish between the two; it is not clear, therefore, what is the status of the masterplan for this site. Whilst supported by Cabinet, it has not been considered by the Planning Committee.

Policy D5 (i) expects masterplans to provide, in addition to an indicative layout, a phasing and implementation plan. The developer's Masterplan for Bushfield

includes no such information, therefore fails to ensure that the development of the site is acceptable in planning terms.

Appendix A provides further analysis of the masterplan.

Question 2: Given site constraints, including its location:

- (i) within a settlement gap, close to the South Downs National Park, its open green qualities;**
- (ii) current use by the community,**
- (iii) biodiversity and natural habitats and**
- (iv) transport impacts,**

how has the developable area been defined (approximately 20Ha). Should this be included within the policy?

Q2 (i) within a settlement gap, close to the South Downs National Park, its open green qualities.

Policy WT3 of the extant Local Plan allocated 20ha of land at Bushfield Camp for Employment Use. The proposed allocation is for a range of mixed uses within the 43ha of land owned by the Church Commissioners.

The developable area appears to have been based on the curtilage of a derelict military camp site. This was requisitioned by the War Office in 1939 to meet a national emergency, but was not returned to use as agricultural land at the end of hostilities.

The allocation of 20 ha for employment related use was never justified on planning grounds. In the draft 2013 Plan, WT3 allocated Bushfield Camp for 'Opportunity Use', which the Inspector then modified to 'Employment Use'.

WT3 was not supported by an assessment of the impact that the development would have on the surrounding downland landscape. Furthermore, the site fails to meet the definition of Previously Developed Land as set out in the glossary to the NPPF, which states:

Previously developed land excludes:land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

The remains of structures constructed in relation to the site's temporary wartime use have now blended into the landscape. Therefore, we contend that the site should no longer be considered as PDL.

Appendix B references the planning history of the site from the 1960's. All proposals were rejected on the grounds that the only appropriate uses for the site were agriculture and recreation. Appendix B also refers to landscape studies produced for the site.

Landscape studies and consideration of planning applications, over a period of forty years, have consistently concluded that the site should not be developed, but should be used for either agriculture or recreation.

The developable area of 20ha has not been clearly defined in planning terms, nor fully assessed against the site constraints. This work should have preceded its allocation in Policy WT3 of the extant Plan and Policy W5 of this Plan.

The site is situated in the countryside and in a strategic gap, where the following policies apply:

Emerging Local Plan

1. Strategic Policy SP3 Development in the Countryside
2. Policy NE7 Settlement Gaps
3. Policy NE8 South Downs National Park
4. Policy NE9 Landscape Character
5. Policy NE14 Rural Character

NPPF

6. Paragraph 180

In conclusion, the site is an area of open chalk downland that adjoins the South Downs National Park and forms part of the landscape setting for the City of Winchester. Any development in this location must comply with the above policies which are: not to create unacceptable noise, light, traffic generation; to maintain the open and undeveloped nature of the settlement gap; to conserve and enhance the unenclosed open downland; and to avoid visual intrusion and impact on tranquillity. When assessed against these policies, the proposed allocation will have an unacceptable impact on this valued landscape, of a magnitude to make Policy W5 unsound.

Q2 (ii) current use by the community.

The site is an area of natural beauty on the edge of four densely populated residential areas.

Policy W5 fails to consider the unique nature of the area as a community resource. The entire site, including the permissive access area and the disused camp has been regularly used for lawful recreations by the surrounding communities for at least the past 50 years, documented in local residents' testimonies as part of the 2008 application for Town and Village Green status.

Bushfield constitutes an important 'green lung' and recreation resource for the four surrounding communities which constitute a significant population: Badger Farm, Stanmore, St Cross, and Olivers Battery.

It offers extraordinary access to an open space for local residents, providing a very special kind of freedom to local people who run, walk their dogs, explore with their children, and engage in other recreational activities.

Prior findings relating to local community use:

In considering the application for Town & Village Green status Leslie Blohm QC (now His Honour Judge Blohm KC) found that an application for the entire Bushfield area to be designated as a Town and Village Green was sound and duly made.

The relevant sub-section of the statutory Framework of the 2006 Town & Village Green Act states an area is appropriate for designation as a 'green space' where:

(a) a significant number of the inhabitants of any locality, or of any neighbourhood within a locality, indulged as of right in lawful sports and pastimes on the land for a period of at least 20 years.

In the subsequent *judgement in the High Court of Justice, The Church Commissioners for England and Hampshire County Council and Barbara Guthrie*, 10 July 2013 (Case number CO/8047/2012), Mr Justice Collins found that the application for Bushfield to become a Town & Village Green was sound.

This decision was overturned in the Court of Appeal, on application of the Church Commissioners, on a time technicality.

Notwithstanding the appeal, the findings of Blohm and Collins defined in law that the entire Bushfield area constitutes an important 'green space' area of significance and utility for local residents.

The **1997 'Bushfield Camp' Study** published by the Planning Department, Winchester City Council reported the '*sense of openness and the site's importance*':

"there are parts of the site which, because of their topology/visibility, ecology, archaeology and/or essential value to the setting of St Cross, are totally unsuited to built development in any significant form."

Further evidence of community use is set out in Appendix C.

Q2 (iii) biodiversity and natural habitats

From a biodiversity and natural habitats perspective, the designation of approximately 20 hectares of Bushfield Camp as "developable" is not justified. The area includes land designated as a Site of Importance for Nature Conservation (SINC), recognised by Winchester City Council for its remnant chalk grassland, a priority habitat under the NERC Act 2006.

Despite this ecological significance, Policy W5 imposes no clear restrictions on density, floorspace, or form of development within the 20-hectare allocation. This omission allows developers to pursue high-density, high-impact schemes, such as the one currently under consideration, where the scale of development would present a substantial threat to biodiversity for the following reasons:

I. Reduced Ecological Connectivity and Network Fragmentation

Bushfield Camp lies at the intersection of local and regional green corridors and is a vital stepping stone habitat connecting the South Downs National Park to green spaces across Winchester. It contributes directly to the Nature Recovery Network (NRN), and its development risks severing this connectivity, contrary to national and local policy. This fragmentation undermines landscape-scale ecological resilience and will negatively impact species movement, including for bats, dormice, and butterflies.

II. Air Pollution and Road Traffic Impacts

Increased vehicle movements will raise levels of nitrogen oxides (NOx), which degrade nutrient-poor chalk grassland within the Bushfield Camp SINC and

contribute to nutrient enrichment in the River Itchen SAC and SSSI through atmospheric deposition and surface water runoff.

III. Urban Runoff and Nutrient Loading

Urbanisation increases impervious surfaces and leads to higher volumes of nutrient enriched runoff (containing nitrogen and phosphorus), directly impacting the River Itchen SAC. This will contravene Policy NE16 and necessitate a full Habitat Regulations Assessment (HRA) under the Habitats Regulations.

IV. Eutrophication of Designated Water Sites

Nutrient discharges via foul wastewater present a credible risk of eutrophication of the River Itchen SAC, the Solent Maritime SPA and Ramsar site, and Solent and Southampton Water SPA/Ramsar site. Such effects risk a finding of “likely significant effect” under HRA, making the proposed allocation potentially unlawful without substantial evidence and mitigation.

V. Wildlife Disturbance and Habitat Loss

Increased disturbance from people, pets, lighting, and noise will impact a range of protected and sensitive species, including Hazel Dormice, Otters, Kingfishers, Woodlarks, and Nightjars, all of which are known to be present on or adjacent to the site.

VI. Increased Predation and Competition

Urbanisation supports opportunistic species (e.g. rats, magpies, foxes) that prey on or outcompete more vulnerable species. These indirect effects are rarely mitigated effectively and further erode site biodiversity value.

VII. Urban Heat Island Effect

High-density development can disrupt the microclimate of chalk downland, harming sensitive flora and fauna, including orchids (*bee*, *pyramidal*) and chalk grassland butterflies.

VIII. Light Pollution

Overnight accommodation and commercial uses will introduce artificial lighting, which will degrade nocturnal habitat quality and alter predator-prey dynamics (e.g. increasing predation of dormice). This is particularly concerning given the site’s elevated and exposed topography and proximity to the South Downs National Park, a designated Dark Sky Reserve.

Flawed Justification of the Developable Area:

The designation of the 20-hectare “developable” area appears to be based on the historic footprint of the former military camp, rather than a robust ecological assessment. There is no evidence that this boundary reflects seasonal biodiversity survey data, functional ecological value, or buffer zones. This approach is inconsistent with the mitigation hierarchy required by Natural England and the IUCN and fails to meet the expectations of the Environment Act 2021.

Notably, the Environment Act 2021 mandates a minimum 10% Biodiversity Net Gain (BNG) for all qualifying developments. Given the site’s existing high ecological value, achieving a genuine 10% BNG on or off-site will be extremely challenging and may not be feasible without loss of ecological function.

Wider Policy Context and Conflict:

- The proposed allocation appears to be in direct conflict with Winchester City Council’s declaration of a Nature Emergency (September 2023). Proceeding with this level of development on a SINC undermines the Council’s own biodiversity commitments.
- The site lies adjacent to the South Downs National Park. Under the Levelling-Up and Regeneration Act 2023 (LURA), local authorities have a statutory duty to seek to further the purposes of National Parks, not simply avoid harm. This includes the protection of natural beauty, wildlife, and cultural heritage.

Appendix D sets out recommended amendments should the allocation be retained.

Q2 (iv) transport impacts

There are fundamental transport emission challenges in locating economic development at a site like Bushfield, on the edge of town. Modelling so far has demonstrated the likelihood of excessive traffic growth.

The site is remote from other activity areas and public transport facilities, and as such will pose major difficulties for keeping its transport emissions low enough. It is likely that the allocation will lead to excessive additional transport emissions in a district where transport emissions are already unsustainably high.

Sections iv and v of Policy W5 are so vague that they risk transport emissions that would undermine the Council's **Carbon Neutrality Action Plan's** target of net greenhouse gas emissions by 2030.

References in **Policy W5 v** to the **Winchester Movement Strategy** and **Local Cycling and Walking Infrastructure Plan (LCWIP)** are misleading since proposals have not been published for either. Discussions so far on the **Winchester Movement Strategy** have not included specific references to Bushfield, so this strategy in its current unfinished form provides no guidance for this site. No timetable has been given for consultation on final proposals for the **Winchester Movement Strategy**.

Policy W5 is unsound. It is not effective because it does not provide clear requirements to ensure that development would be consistent with the Council's **Carbon Neutrality Action Plan's** target of net zero greenhouse gas emissions by 2030. It would conflict with **Policy CN1** of the Reg19 Plan and with national policy in paragraph 11a and para 159 (previously 158) of the NPPF. Furthermore the allocation conflicts with **paragraph 108 (was 110) (b) of the NPPF**, as it has not been prepared with the active involvement of the highways authority or neighbouring council/s.

Question 3: What evidence supports the provision of office space within the 20 Hectares developable area?

Question 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?

Questions 3 and 4 both refer to the justification for the proposed allocation. We have therefore dealt with these two questions together in order to avoid repetition.

The following statement responds to the above questions and does not seek to duplicate the original objection which also refers to the ambiguity of the wording of W5; the impact development at Bushfield Camp would have on Winchester city centre; and the site's close proximity to junction 11 of the M3 which, in turn, means the development would relate to the wider sub-region rather than the city itself.

The need for and supply of additional office employment land

There is a significant lack of evidence to support the need for 20 hectares of office space at Bushfield Camp.

The Planning, Regeneration & Infrastructure Employment Land Study (July 2024) referred by Winchester City Council in their response to the Reg.18 local plan objections as the “updated employment land study and the Employment and Town Centre Uses Study 2024 or ETCUS.

ETCUS shows a need for office employment land to 2040 of: -

- 12.2 ha. based on an average of the three economic forecasts: or
- 3.3 ha. based on past completions (ETCUS table 54, p.110).

The 12.2 ha. need includes: -

- 3.4 ha. to replace offices lost to other uses (“replacement allowance”); and
- 0.8 ha. to create a “5-year margin” (ETCUS table 53, p. 109).

Currently, 4 city centre offices, comprising 97,000 sq.ft. have been/are being lost to other uses and impending local government reorganization could further reduce the need for office space in Winchester.

It is unsustainable to allocate countryside outside the city centre to replace office space lost to other uses within the centre. Recognising this, in November 2017 WCC issued an Article 4 Direction to control the loss of offices to residential.

On the need side, if the “replacement allowance” and “5-year margin” were to be excluded from the need for office employment land that need would fall to **8 ha.**

On the supply side, if the 11.8 ha. of office employment land allocated at Bushfield Camp in Policy W5 were to be excluded the supply of office employment land would fall to **5.2ha.** (The 11.8 ha. of office employment land is taken from WCC’s Response to Objections to the Reg. 18 local plan).

A supply of 5.2 ha. (without Bushfield Camp) is marginally close to the reduced need figure (based on average forecasts) and greater than the need of 3.3 ha. based on past completions.

Therefore, based on the evidence on the requirement for and supply of office employment land Policy W5 is not justified and is therefore unsound.

Commuting Patterns

ETCUS (pp. 44-45) demonstrates how strong Winchester's economy is, thereby undermining any need for a further 11.8 ha. of employment land at Bushfield Camp:

"Winchester has a considerable commuting inflow with 11,318 more workers working in Winchester than residing there." This net inflow may reflect its county town status.

"At the time of the 2021 Census 33,264 (55%) of Winchester's working residents worked mainly from home or had no fixed workplace. Out of Winchester (district's) 27,319 residents who commute to work, 13,293 work in Winchester (city), representing a 49% residence self-containment rate."

ETCUS continues (para. 3.5.27)

- Winchester has a diverse economy with sectoral strengths in retail, health, professional scientific, and technical, education, and business administration and support services;
- Levels of homeworking are higher in Winchester compared to the national average;
- With regards to annual earnings, Winchester is broadly in line with the Hampshire and England average;
- (Figure 5. p. 40) Winchester's employment rate is above that of Hampshire and England.

The increase in and high level of homeworking in Winchester is significant and beneficial as it retains the high spending power of Winchester's resident workforce (by reducing out-commuting) without any need for additional office employment space which, in the case of Bushfield Camp, would have a severe environmental impact.

Therefore, the commuting patterns in the district mean that Bushfield Camp is not required to deliver necessary social, economic or environmental development.

Question 5: Would the policy require phasing to align with the delivery of sewage infrastructure?

Yes – if adopted Policy W5 must include a binding requirement for phasing to align with the delivery of sufficient foul and surface water infrastructure. Without this, the Local Plan risks failing the tests of soundness and breaching the Habitats Regulations and nutrient neutrality legal obligations.

Appendix E sets out changes that would be required to ensure legal compliance, protect the River Itchen SAC, and meet the requirements of nutrient neutrality and sound plan-making.

Question 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

There is no evidence to indicate that this allocation would be delivered within the submitted Plan period. As we explain in our Regulation 19 statement (paragraph 2.3), since the WT3 was allocated in 2013 no attempt has been made to develop the site as allocated.

The outline planning application made in 2023 is for mixed use, not the employment use allocated. The very fact that this application has stalled indicates that there remain serious barriers to delivery, one of which is presumably viability. However, failure to develop the site for the previously allocated use over a period of 12 years does not justify changing the allocation to a more harmful use.

Progress on the outline planning application has been glacial, such that it has already fallen far behind the masterplan timeline. Furthermore, the recent announcement that the developers propose to work in collaboration with Sparsholt College suggests a degree of desperation and confirms that this is a site in search of a use rather than an allocation that will meet an identified need.

Question 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?

Yes — to be found sound, Policy W5 must include clear, enforceable requirements addressing nutrient neutrality and the protection of the River

Itchen Special Area of Conservation (SAC). Without these, the policy risks non-compliance with the Conservation of Habitats and Species Regulations 2017 (as amended), and the requirements of the Levelling-Up and Regeneration Act 2023 (LURA). These are set out in Appendix F.