

### **Friends of River Park**

**These responses to the E17 questions follow on from our Reg 19 Submission [Response ID ANON-AQTS-32MJ-N]**

### **Winchester learning and non-residential institutions allocations**

### **Policy W10 Former River Park Leisure Centre site**

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

The Leader of Winchester City Council has announced that the University of Southampton has withdrawn from any agreement to put forward proposals for the River Park Leisure Centre Site. This means that there is no current development plan, whether for education or for any other purpose, in relation to this piece of land.

Accordingly, there is no evidence to indicate that this allocation would be delivered within the submitted Plan period. There has been no attempt made to advance plans to develop the site as contemplated by the allocation. Indeed, the Leader has now invited the public to submit their own proposals for the site, which may include a Lido or even a return to green grassland.

As is pointed out in our Reg 19 submissions, at Appendix B, consideration of future land uses for both the redundant leisure centre building and the surrounding site are subject to historic restrictions on the Land Registry title, which relate back to the original site purchase. The land is currently held by the Council on a statutory trust as a public park and recreation ground for the City, and it is subject to a restrictive covenant which precludes the building of housing or development for any purpose other than public recreation.

<p>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?</p>	<p>The Inspector's attention is invited to Section 2 (Biodiversity/water environment) in our Reg 19 response. The site is located between two branches of the River Itchen (SAC and SSSI), and there are numerous surface water streams and drainage ditches crossing the site, including one flowing west to east immediately to the rear of the leisure centre building. The main watercourses flow from north to south past the site, which is bounded on three sides by the River Itchen's clear, chalk streams.</p> <p>There is no up-to-date flood risk assessment but an Environment Agency report, commissioned by the Council in 2013, said that 'The land mostly lies in a zone (3A) where floods are highly probable, and it is upstream of the city and the Cathedral' . In the Report, it is said that 'a new design that increased the existing building footprint or the impermeable area within the floodplain would not be appropriate in this location'; also, 'replacing the existing leisure centre buildings with open space might have a beneficial effect on downstream flood risk'.</p>
<p>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?</p>	<p>Policy W10 ix states that the proposals are designed to complement and enhance the appearance of the River Park Recreation Ground and provides (sic) a suitable and attractive gateway into the City. This is disingenuous. The converse is true in that the proposed allocation for development, involving a large, new-build student campus, would adversely affect the landscape and tranquillity of the River Park Recreation Ground and the Winnall Nature Reserve which forms part of the South Downs National Park (see Policy NE1 and Objective 10 of the Reg 19 IIA report).</p>

	<p>Furthermore, Policy W10 x states that 'the proposals are designed to be permeable, that includes publicly accessible performance/events space that benefits the City'. This was never going to be the case, as in the Heads of Terms document agreed between the Council and the University the public were to be excluded from the site for the first 35 years of the long lease. It was designed to be for tertiary education only and there was no mention of permeability or of any performance/events space.</p>
<p>Would the site contribute to the open space/recreation space requirements in the District? And if so in what way?</p>	<p>See our Reg 19 response at Section 3 (Character and impact on landscape). Development of this site would significantly detract from the open space/recreation space requirements in the District.</p> <p>Allocated use of the building on the site is currently F2 'local community use'. Use Class F2 uses are protected for local community use. There are no permitted development options for use Class F2; therefore, any changes of use would require full planning permission. In this context, there is no assessment of, nor any demonstrable need for, an innovation/education hub, let alone on this particular site which is part of a park of historical importance (Policy HE12).</p> <p>The Recreation Ground, of which the site forms a significant part, lies in the City Ward of St Bartholomew. Following the boundary changes to the Winchester Wards in 2016, the population of St Bartholomew's Ward has increased, leading to a corresponding decrease in the adequacy of open space when assessed against the council's own Open Space standards. At present it stands at -1.70</p>

	<p>for informal green space, -0.25 for natural green space and -4.25 for play space (see Figure 3 in our Reg 19 response: Open Space Assessment 2022 pp74-75: St Bartholomew Ward). This last is particularly of importance given the recent increase in young families in the area. All this cannot fail to suffer further negative impact by some large-scale development on the redundant leisure centre site. We say that this supports our view that the Council cannot allow this significant part of the Park's open space, where people can play, exercise and enjoy their leisure time, to be handed over for development as an educational facility.</p> <p>The site has only ever been for the use of the local community for recreational purposes. The proposals for allocated development of the site bring Policy W10 into conflict with other policies in the Local Plan, such as NE3 and NE13 and with NPPF paras 97 and 101-102.</p>
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