

Consultation comments on E3 – town centre strategy and hierarchy

- Support - 12
- Neither support of object - 0
- Object - 7

The changes to the supporting text and the Local Plan policies have not only been informed by the responses to the Regulation 18 consultation but they have also taken on board any additional feedback that has come out of discussions/meetings with statutory consultees and members in order to improve the clarity and understanding of the contents of the Local Plan.

Comments in support of policy E3 – town centre strategy and hierarchy		
Respondent number	Comment	Officer comment
ANON-KSAR-NKBD-G	From what I can ascertain many of the well-loved shops that have been lost from Winchester because of over-high rates.	Comments noted. The level of rates are outside of the remit of the Local Plan. Recommended response: No Change
ANON-KSAR-N8MP-M	[This response should be read in conjunction with the full copies of the ‘North Whiteley Representations to the Winchester Local Plan Regulation 18 representations OBO Crest Nicholson’ representations submitted by email to: planningpolicy@winchester.gov.uk on 14/12/2022 from j.grist@nexusplanning.co.uk , which includes the relevant figures and appendices, with tables correctly formatted] Paragraph 81 of the Framework gives significant weight to the need to support economic growth whilst paragraph 86 emphasises the role town centres play at the heart of local communities. In this respect, the Council seeks to promote a vibrant economy for the District with Strategic Policy E1-E4 setting out the	Support for strategy welcomed and comments noted. Site specific comments regarding North Whiteley (Policy SH2) will be considered under responses to that policy. Recommended response: No Change.

	<p>strategy for achieving this. Crest Nicholson is committed to helping the Council achieve its target of creating a vibrant economy through the development of the land at the North Whiteley MDA by locating development in a sustainable location where future occupiers will be situated in close proximity to existing services and facilities of the town to ensure the continued vitality and viability of Whiteley District Centre.</p>	
<p>ANON-KSAR-N856-2</p>	<p>it is hoped that the 3G football pitches planned by the parish council to be sited at Mill Lane, Wickham would be presumed to be an out of scale, higher level of facility in the hierarchy and therefore be more suitable for a town higher up in the hierarchy or a city.</p> <p>'10.72Proposals should not be out of scale in relation to the size and function of the centre where they will be located. In these cases, developments will be directed to centres higher up in the town centre hierarchy'.</p>	<p>There are no issues arising for Policy E3 from this comment.</p> <p>Comments regarding Wickham (Mill Lane) will be considered under responses to site allocation The Glebe (WK2) and other allocations in Wickham as relevant.</p> <p>Recommended response: No Change.</p>
<p>BHLF-KSAR-N8T8-3 Olivers Battery Parish Council</p>	<p>OBPC supports the strategy to maintain and enhance the role of centres as thriving areas for community and economic activities and enhance the quality of the environment of the centres, including the defined Local Centre in Oliver's Battery.</p>	<p>Support welcomed.</p> <p>Recommended response: No Change.</p>
<p>BHLF-KSAR-N8BX-H</p>	<p>Strategic Policy E3 E4 The Trust supports the aspiration to maintain and enhance the role of centres. Healthcare uses would be more easily accessible in some cases and are potentially mutually beneficial to other uses in town</p>	<p>Support welcomed and comments noted.</p> <p>Recommended response: No Change.</p>

	centres. The Trust would be please to explore potential as appropriate.	
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Comments that object to policy E3 – town centre strategy and hierarchy		
Respondent number	Comments	Officer comment
ANON-KSAR-NKHU-7 Oliver's Battery Parish Council	Town Centres Strategy and Hierarchy (Policy E3) OBPC supports the strategy to maintain and enhance the role of centres as thriving areas for community and economic activities and enhance the quality of the environment of the centres, including the defined Local Centre in Oliver's Battery.	Support welcomed. Recommended response: No Change.
ANON-KSAR-NKZ5-S	See E1	See E1 for comment. Recommended response: No Change.
ANON-KSAR-NKYT-Q	This, as I have commented in previous sections should be part of a holistic approach to 'a vibrant economy' with mixed use and an end to 'zoning' in all areas.	The comments have been considered in response to E1 and do not raise any new issues here. Recommended Response: no change.
ANON-KSAR-NK3N-B	The current Local Plan has a very clear "Town Centre First" policy for protecting the viability and character of town centres in Winchester. This policy has been successfully used to prevent retail businesses going out-of-town when the town centre options have not been properly considered. The "Town Centre First" policy helps to protect the countryside and the natural environment from destruction and pollution. The new Local Plan must incorporate a clearer and effective "Town Centre First" approach.	The proposed Local Plan also has a clear presumption in favour of 'Town Centre First'. The importance of this is recognised in its inclusion as one of the key criteria for development proposals set out in Strategic Policy Spatial Strategy and Development Principles (SP2) vii. Strategic Policy Town Centre Strategy and Hierarchy (E3) is a positive rather than restrictive policy that describes the types of development that will be supported within town centres.

		<p>However, it is recognised that the ‘Town Centre First’ principle, which is expressed in the sequential test may need to be emphasised as part of the policy that sets out how the Local Plan will consider applications for town centre uses outside of the identified centres. An amendment is therefore proposed to the Retail and Main Town Centre Uses Policy (E4)</p> <p>Recommended Response: See response and recommendation under E4.</p> <p>It is further considered that the first paragraph of E4 which sets out that needs for main town centre uses should be met within identified centres, would be better within Policy E3. The final sentence will not be required as it repeats part of existing E3.</p> <p>Recommendation: Insert first paragraph from E4 before second paragraph of E3 as follows – The required need for retail and main town centre uses development will be met within the identified town centres of the hierarchy, by the development within the site allocations set out in the plan and the approval of new development within town centre boundaries. The scale and form of the development should be appropriate in relation to the size of the centre and its role within the hierarchy.</p>
ANON-KSAR-N81T-V	WCC needs a diverse range of shops and policies that encourage a wide range of rural residents as well as city dwellers to visit the city. There is considerable	The strategy of the Local Plan seeks to improve the vitality and viability of town centres. It is considered that reduction of vehicles will have benefits for carbon

Sparsholt Parish Council	concern that if the local plan is dominated by the Movement strategy, which seeks to eliminate vehicles from the city centre, it will hinder the economic growth and vibrancy of the city. The City Council need to adopt Business rates and Rental Policies to encourage business people to open a wider range of shops and businesses.	reduction and air quality and enhance the environment. Park and Ride facilities provide access to the city centre of Winchester Town. Comments in relation to the Movement strategy are considered in detail under the Transport Topic of the Local Plan. The comments relating to business rates & rental policies are noted, however these matters are outside of the remit of the Local Plan. Recommended response: No Change
ANON-KSAR-N88Q-Z	E3 New paragraph 4 Allow use of temporary 'meanwhile' uses, and space for open-ended projects or events, based around growing, buying, selling and eating food, e.g. market stalls, coffee vans at different times of the week.	Temporary meanwhile uses are already supported by Strategic Policy E1 and are discussed in the text to E3 at paragraph 10.55. It is not considered necessary to go to that level of detail within the policy. Recommended Response: No Change
BHLF-KSAR-N8BD-W	Ambiguities in the text Residential use and Central Winchester Regeneration (CWR) The Trust objects to the inclusion of the word “exceptional” in paragraph 10.59 because it renders the Local Plan ambiguous/inconsistent about the role of residential development on key regeneration sites. For example: • Paragraph 10.43 refers to Policy W7 which states that CWR will provide “an appropriate mix of uses ... including retail, residential and leisure....” • Paragraph 10.59 says “Exceptionally residential development may be considered as part of large-scale	It is not considered there is a conflict between a general policy approach to residential development within centres which sees it as a complimentary use, and the regeneration schemes. It is considered appropriate to treat such schemes as exceptional to the general approach. The council’s approach is consistent with government guidance which encourages living within city centres, but also clearly states that it is a supporting use to the main commercial and public roles of town centres. The wording in CWR Policy W7 iii) is specific to that site allocation. Recommended Response: No Change

	<p>regeneration schemes such as within the CWR.”</p> <ul style="list-style-type: none"> • Paragraph 10.110 states: “residential development can play a useful supporting role in supporting centres but is not a main town centre use.” <p>The Trust prefers the wording used in Policy W7 iii.</p>	
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	Recommendations	Officer response
Comments from SA	<p>The recommendations for the policy text are included to help mitigate any negative effects and strengthen any positive effects identified:</p> <p>Strategic Policy E3 could be strengthened by encouraging access for all to town centre locations and also within these areas. Access by active and public modes of transport to town centre locations and also within these areas should also be promoted for all types of residents. This could be incorporated as part of the bullet points which set out the criteria for developments which are to be supported in town centre locations. Access for all should include access for more specialist groups such as older people and people with disabilities.</p>	<p>It is important that LP is read as a whole. There are a number of other LP policies in the high quality design and sustainable transport and active travel topics that address these issues, although the supporting text to E3 does state that the both the centres and individual buildings should be accessible to all.</p> <p>Recommended response: No Change.</p>
Comments from HRA	NONE AS YET	

Amendments to Policy E3

Amendments to supporting text

All text amended final version below.

TOWN CENTRES STRATEGY AND HIERARCHY

10.51 The plan policies in respect of strategies for town centres and developments for retail and other town centre uses have been informed by two recent studies –

- The Retail and Town Centre Uses Study 2020 (RTCUS)
- Employment and Town Centre Uses Study 2023 (ETCUS)

10.52 The 2023 Study contains the most up-to-date forecasting in terms of needs for additional retail and other town centre uses and reviewed many of the findings of the 2020 Study. However, both studies should be looked at in conjunction as they focussed on different elements of town centre uses as set out below:

Issue	2020 RTCUS	2023 ETCUS	2020 &/or 2023 Study
Capacity	Yes	Yes	Use 2023 figures
Boundaries of town centres & primary shopping areas	Yes	No	2020
Hierarchy	Not in detail	Yes	2023
Larger Centres	Yes & strategies	Health Check & commentary	2023 & 2020
Local Centres	No	Yes	2023
Planning Policy Updates for new legislation	No	Yes	2023
Impact Threshold	Yes & detailed rationale	Review only	2023/2020

10.53 The main findings of the 2023 Study are set out below:

- Capacity – need for 395 sqm additional convenience floorspace and 741 additional comparison floorspace over the plan period.
- Hierarchy – Generally appropriate.

- Local Centres – Generally appropriate. Weeke is performing more than expected for a local centre. Kings Worthy is small in terms of its provision.
- Amendment to Policy E7 Maintaining the vitality and viability of town centres to reflect recent legislative changes.
- Confirmation of the 350 sqm impact threshold for retail and leisure uses out of centre. (See Policy E4)

10.54 The detailed capacity findings are set out below –

Retail Capacity up to 2040 (sqm net sales area)			
Retail Capacity	2034 (10 Yrs)	Peak need 2029	2040 (Plan Period)
Convenience	507	516	395
Comparison	906	1,401	741

10.55 These figures indicate a reduced need from those identified in the 2020 Study, particularly in respect of comparison shopping as a result of the changing economic situation and updated expenditure forecasts. The identified need takes account of proposed town centre developments including the regeneration sites within Winchester Town Centre. The most recent study therefore concludes that there is no need to make any additional allocations or expansion of the boundaries of town centres to accommodate the identified need, as the requirement identified is so small and is likely to be met through changes of use between different town centre uses and redevelopment of town centre sites. The 2023 Study did not identify any specific requirements for leisure or other town centre uses apart from retail.

10.56 In the light of this, the study emphasises the need to be flexible in respect of uses within town centres to maintain and enhance viability and the town centre strategy of the plan set out in E3 follows this approach.

10.57 The 2023 Study also highlighted that long-term forecasting of retail and town centre floorspace is unreliable. Government guidance recommends reviews in ten years. Given the pace of recent structural changes in retailing and the ongoing fluctuations in the economy, the study recommends that caution is applied to the floorspace figures, which gives further emphasis to the need for town centre policies to be flexible and responsive.

- 10.58 Taken as a whole, the 2020 and 2023 Studies confirm the town centre hierarchy and strategies of the plan are broadly appropriate. The 2023 Study looked in detail at the local centres. It concluded that they were generally functioning as expected. Weeke is currently performing higher than would be expected for a local centre, however it does not offer the range of activities and services that would be expected at a district centre. Kings Worthy centre was found to be smaller than usual for local centres. It is acknowledged that planned developments over the plan period, may change the balance of centres within the district. It is therefore considered that the hierarchy could be considered further in any subsequent review of the Local Plan when larger scale developments will have taken place.
- 10.59 The other findings of the 2023 Study in relation to plan policy have been incorporated within Policy E7 Maintaining the Vitality and Viability of Town Centres (in respect of new use class and permitted development changes) and Policy E4 Retail and Main Town Centre Uses ~ (in respect of impact thresholds)
- 10.60 In consideration of recent social, economic and legislative changes, town centres will need to change and adapt with retail development being supported by a much wider range of uses and activities, such as green space, leisure, arts and culture and health and social care services combined with housing to create a space based on social and community interactions. The key will be to encourage uses that will generate and increase the footfall, activity and the appeal of the high street with retail development still at the heart of the centre.
- 10.61 Appropriate uses and activities will be those that support the economy of the centre, including retail, commercial and office and the growing sectors of entertainment, food and drink and tourist development. The main town centre uses as defined in the NPPF will be generally supported, in summary these are: retail, indoor leisure, entertainment, intensive sport and recreation uses (e.g. cinemas, restaurants, bars and pubs, nightclubs, health and fitness) offices, arts, culture and tourism development (including theatres, museums, galleries, concert halls, hotels).
- 10.62 Other uses that are primarily aimed at visiting members of the public are appropriate within town centres, such as banks, building societies, estate agents and other professional services health and beauty services, such as hairdressers and beauty salons as they generate footfall.
- 10.63 Other uses that attract large numbers of people will be encouraged within the town centres, where they are of an appropriate scale in relation to the centre's role in the hierarchy. Public buildings that serve visiting members of the public, or attract a

large number of visitors such as community halls, libraries, administration centres, educational institutions, and religious buildings may also be considered as town centre uses depending on their scale and operation. Policy E7 sets out detailed criteria for new developments, including where particular uses will be encouraged to locate.

- 10.64 Uses and activities that enhance the visitor experience and increase the attractiveness of centres will be encouraged along with activities that widen the role of centres beyond retail, add to viability and increase vitality. Temporary uses, 'pop up' activities, markets and special events can all add to the vibrancy of centres. Some of these activities will not require planning permission, but consideration will be given to developments that support and assist the promotion of these activities, such as improvements to the public realm, provision of outdoor seating, canopies and outdoor installations etc. Support will be given for the creative economy, which is a vital part of the Winchester economy and Winchester Town in particular.
- 10.65 The visitor economy is an important element of the economy of the district and facilities should be focussed within the town centres. Winchester City and the historic market towns of the district are attractive to visitors and developments that enhance this role will be supported. This includes hotel development, which will need to be considered in accordance with the sequential test set out in Policy E4.
- 10.66 Proposals that develop and support the night time economy within the town centres will generally be encouraged, such as new entertainment and food and drink offers that can offer a variety of experiences at different times of day. Such uses support the visitor economy and provide useful facilities for residents of the town centres. Activity during the evenings, can mitigate against dead frontages and make the town more welcoming by providing natural surveillance. There can be pollution and amenity issues related to these uses, so they may not be appropriate in all locations and may need particular restrictions in relation to their activities.
- 10.67 Town centres should also be places to live, where that would support the economic functions of the centre and enhance vitality and viability and support the night time economy. Residential development can play a useful supporting role, but it is not a main town centre use and does not contribute towards maintaining active frontages within streets. This will therefore generally be encouraged above ground floor within the primary shopping areas.

- 10.68 Exceptionally, residential development may be considered as part of large-scale regeneration schemes, such as within the CWR. Opportunities to provide specialist forms of housing that would benefit from being within town centres will be considered, having regard to the effects on the economy and the strategy of the plan.
- 10.69 The centres of Winchester Town, Bishops Waltham, New Alresford and Wickham contain conservation areas. Proposals within these areas, will need to maintain and enhance the historic character.
- 10.70 Opportunities exist to enhance the quality of the local environment and increase its attractiveness as a place to visit will be supported. Proposals that enhance the sense of place will be supported along with improvements to the built environment, the public realm, or provide public open space. Opportunities should be taken to improve the access to the centres and individual buildings and ensuring that they are accessible to all members of the community including those living with dementia, people with disabilities and reduced mobility.
- 10.71 The town centre hierarchy supports the spatial strategy of the Local Plan, setting out a network of various centres comprising a variety of different scales and roles. Winchester, Whiteley, Bishop's Waltham, New Alresford and Wickham are the higher level centres. Primary shopping areas (PSA) are identified within these centres and are illustrated on the policies map.
- 10.72 PSA are described in national policy as defined areas within town centres where the main retailing activity takes place. These centres serve an important function within the retail hierarchy and it is important that this role is supported where feasible. Retail development will be encouraged to locate within the PSAs of the centres listed above, which form the centre for the purposes of the sequential test in respect of retail development.
- 10.73 The different town centres of the district have distinct characters that should be supported as described below:
- 10.74 **Winchester Town.** The City of Winchester acts as a sub-regional centre and has a wide range of shopping, entertainment, cultural facilities and a significant role as a commercial employment area, particularly within the administrative, public services, health and further and higher education sectors.
- 10.75 It is important to reinforce Winchester Town's position as a sub-regional shopping centre for comparison shopping by enabling a variety of different retail opportunities to occur with a range of different sizes and configurations of retail units. New

retail development will be supported within the town centre and particularly encouraged to locate within the PSA to maintain the concentration of retail development in and around the historic high street. The availability of shopping and independent shops in particular in historic and attractive buildings/setting is key to the attraction of the centre. The historic setting of the City with its conservation area and many listed buildings, means it is a significant attraction for day visitors and overnight stays. Tourism and visitor development will continue to play a large role in its future economy.

- 10.76 There are a number of areas within the town centre that require regeneration and specific sites and proposals are identified within the site allocation section of this plan. This includes the Central Winchester Regeneration (CWR) which is located in the heart of the city and will play a key role in relation to future proposals around the city centre along with plans for the Station Regeneration Area.
- 10.77 **Whiteley town centre.** Whiteley is still a developing settlement. The town centre is modern and purpose-built, having recently been redeveloped. Whiteley town centre is considered of a scale and function to act as a district centre, serving both the town and a larger catchment area for comparison goods. It also provides a wide range of modern attractions such as indoor leisure and recreation, including a large cinema. It has a wide range of food and drink opportunities.
- 10.78 **Bishop's Waltham, New Alresford and Wickham.** These market towns are relatively small centres in terms of the retail hierarchy. Despite this, their function as market towns/ villages at the heart of larger rural areas means that they act as centres for their catchment areas and a PSA acts as an important focus for activities. These towns have attractive historic cores, comprising of conservation areas. There are growing centres for food and drink outlets and have established attractions of markets and specific events. They are attractive to visitors and are located nearby to the South Downs National Park. These market towns have potential to increase the role of tourism and visitor-related development and attractions.
- 10.79 **Denmead, Kings Worthy, Oliver's Battery, Stockbridge Road/Andover Road and Weeke.** These are at the lower level of centres in the hierarchy and function as local centres, providing clusters of town centre uses within their locality. These centres have a variety of uses and act as important community hubs that provide the opportunity for residents to be able to shop locally for their day-to-day needs and avoid the need to travel. It is therefore important to maintain uses within these centres that support that role and do not undermine the vitality and viability of the centre.

10.80 In addition to the centres identified in this policy, there are a number of smaller centres or clusters of shops which are too small to be identified in the Plan as local centres but which nevertheless provide important local facilities, which are protected by Policy E8.

10.81 Proposals should not be out of scale in relation to the size and function of the centre where they will be located. In these cases, developments will be directed to centres higher up in the town centre hierarchy.

10.82 Specific guidance on how proposals within town centres will be assessed is set out within the development management Policy E7.

Amendments to policy

Strategic Policy E3 Town Centres Strategy and Hierarchy

The Town Centre Strategy is to maintain and enhance the role of centres as thriving areas for community and economic activities and enhance the quality of the environment of the centres.

The required need for retail and main town centre uses development will be met within the identified town centres of the hierarchy, by the development within the site allocations set out in the plan and the approval of new development within town centre boundaries.

The vitality and viability of town centres will be enhanced by encouraging a wide range of uses and activities within the centres, of a function and scale appropriate to their position within the town centre hierarchy.

Within the town centres, the main town centre uses of retail, office, indoor leisure uses, will be supported, along with similar uses that are aimed primarily at visiting members of the public and add to the vibrancy and attractiveness of centres, such as those related to entertainment, food and drink, cultural and art and activities that support the evening and nighttime economy.

Developments that support the visitor economy and tourism, including hotel accommodation, will be encouraged, having regard to the hierarchy and subject to the scale and impact of the proposals.

Residential and commercial development will be encouraged above ground floor level.

Developments will be supported where they:

- i. Support the vitality and viability of centres.
- ii. Support the visitor experience and support the centres as destinations for shopping, leisure and entertainment activities;
- iii. Respect and enhance the existing character of the centres, including the historic character and intrinsic qualities of the built environment within conservation areas.
- iv. Would complement and, where possible, make improvements to, the built environment, public realm and incorporate public open space.
- v. Maintain and enhance the existing role of centres as community hubs or for local administration.

New developments and changes of use within the identified centres (listed below & indicated on the Policies Map) will be assessed having regard to the detailed criteria set out in Policy E7 and by taking into account their location and the scale of development proposed, in relation to the town centre hierarchy as set out below:

Sub-regional town centre – Winchester

Town Centre – Whiteley

District Centres – Bishops Waltham, New Alresford, Wickham

Local Centres – Denmead, Kings Worthy, and in Winchester; Olivers Battery, Stockbridge Road/ Andover Road, Weeke.

The boundaries of the identified centres are indicated on the Policies Map. Winchester, Whiteley, Bishops Waltham, New Alresford and Wickham have Primary Shopping Areas within the wider town centre area and these are also shown on the Policies Map. New retail development will be directed towards the Primary Shopping Areas of centres, where one is identified.