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**Chairman: Keith Leaman**



## **Outline planning application for Bushfield Camp ref: 23/02507/OUT**

### **Comments by the City of Winchester Trust**

The City of Winchester Trust **OBJECTS** to this application.

1. The application has been assessed against **Policy WT3** for Bushfield Camp in the LPP1 Joint Core Strategy adopted in March 2013, and other relevant policies in the Development Plan, that includes LPP2 -Development Management and Site Allocations adopted in 2017. Comments made, following public consultation on the Reg 18 Local Plan Review and **Policy W5** for Bushfield Camp, have not been published or been subject to examination. The status of this Plan is an unadopted document. The application has placed too much weight on the provisions of the Reg 18 Plan, which is at an early stage in its production, and does not acknowledge the planning policies in the adopted LPP1 and LPP2.
2. **Employment**  
Policy WT3 allocates the site for Employment Use – Class E business use. A significant quantum of floorspace and uses proposed in the application are not within this use class and represent a speculative application to meet an unidentified need.
3. **Impact on town centre**  
Policy WT3 states that development of the Bushfield Camp site for employment should not compete or detract from the town centre. Determination of this application should be informed by an up to date Employment Land Study. If land for employment is required, priority should be given to allocating land for regeneration sites in the town centre.
4. **Impact on landscape setting**  
On the evidence provided it is concluded that the development will be visually intrusive and the illusion of open chalkland free of buildings will be changed and be contrary to Policies WT3 and CP19.
5. **Rural site outside the urban edge**  
Bushfield Camp is a rural site outside the urban edge of Winchester. The magnitude of development proposed and associated activity would have an unacceptable impact visually and physically and on the tranquillity of the area and be contrary to Policy DM23.
6. **Intrusion into the settlement gap**  
Bushfield Camp is within the Winchester-Compton Street Settlement Gap. Development of the magnitude proposed would be contrary to Policy CP18.
7. **Biodiversity and SINC designation**  
This is a sensitive site. Nature conservation is too important a matter to be a reserved matter. To comply with Policy CP16, a comprehensive Landscape Management Plan is required for approval.

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## 8. Traffic and emissions

The application proposes mitigation measures to offset the need to use the private car for development in this rural location. On the evidence provided, the traffic that would be generated by the proposed development is unlikely to comply with Policy CP10 and make a positive contribution to the City Council's Carbon Neutrality Action Plan.

## 9. Principles of the proposed development

The Trust is opposed to the principles of the proposed development for the reasons set out above. They are contrary to the stated policies in the adopted LPP1 and LPP2. The Concept Masterplan presented to WCC Cabinet is largely based on Policy W5 in the unadopted Reg 18 Plan.

Development of undisclosed design in an area of important landscape value adjoining a National Park, in a rural location and a settlement gap, and its impact on regeneration projects in the town centre of Winchester is unacceptable.

It is not possible to judge the application without detailed landscape, topography, biodiversity and site details. An outline application for a scheme of this magnitude and complexity is not appropriate or acceptable and should be **REFUSED**.

These reasons for objection are set out in detail in the supporting statement below.

## SUPPORTING STATEMENT

### 1.0 Local Plan Background

The Reg 18 Local Plan Review published for public consultation at the end of 2022 contained Policy W5 for Bushfield Camp as an Employment Allocation, for mixed use high-quality flexible business and employment space, an innovation/education hub and creative industries, provided that detailed proposals accord with the Development Plan.

Report to Cabinet 21 June 2023 Bushfield Camp Concept Masterplan  
Technical Document to accompany the Concept Masterplan  
2.5 Emerging Local Plan

The draft local plan includes a revised Policy for Bushfield Camp (W5), retaining the allocation but updating and amending it as considered appropriate.

Draft Policy W5 – Bushfield Camp – The emerging policy confirms that the site is allocated for a mixed-use highest quality flexible business and employment space, an innovation/education hub and creative industries. In common with adopted policy, the draft policy sets out a number of key criteria which set the parameters for any future development of the site.

The applicant's Planning Statement para 9.24 states:

*...draft policy W5 sets a clear direction of travel for WCC, and therefore whilst not an adopted policy it is clear that a wider and more flexible set of employment uses are considered by WCC as acceptable for the Bushfield Camp site...and clearly endorsed by the Cabinet decision on the masterplan.*

The applicant's Planning Statement para 4.3 states:

*Outline planning permission is being sought with all matters reserved (apart from access) to establish the principle of the proposed development... the appearance of the proposed buildings, the final layout, scale and landscaping scheme are not fixed or provided in detail as part of this submission. Access from the existing highway into the site is applied for in detail.*

The applicant's Planning Statement para 6.25 states that the Concept Masterplan was presented to WCC Cabinet on 21 June 2023, where it was agreed that it would be a material consideration to inform the development management assessment of the planning application.

## **Comment**

The applicant has submitted an outline application with all matters reserved (apart from access) to establish the principles of the proposed development. The principles require assessment of the quantum and type of development proposed, the transport and traffic implications of serving the development and the cumulative impact that the development of the site will have on the landscape setting and the Winchester Town Centre.

Looking at Local Plan Policy WT3, which describes Bushfield as a sensitive site, WCC should not have accepted an application in outline for access only.

The Concept Masterplan presented to WCC Cabinet on 21 June 2023 is a material consideration and does not have the status of endorsement by the Council.

In the consultation held Nov/Dec 2022 on the draft Reg 18 Winchester District Local Plan, the Trust objected to Policy W5 for the allocation of 43 ha (total site area) at Bushfield Camp for high quality flexible businesses and employment space, an innovation/education hub and creative industries.

It is evident from the applicant's Planning Statement that the way proposals have evolved with a wide variety of uses for the site, generating the need for a large quantity of car parking, has been driven by what they consider to be an attractive offer to the market. In turn this has been encouraged by the unadopted Policy W5 and the reception accorded to the Concept Masterplan by WCC Cabinet.

The Trust concludes that the applicant is in error by placing too much weight on the provisions of the unadopted Reg 18 Plan and not basing the application on the adopted policies in LPP1 and LPP2.

## **2.0 Employment**

### **2.1 Proposal**

The areas of accommodation being proposed are:-

F1 Academic floorspace	10,800 sqm (int.floorspace)
<i>Sui generis</i> Academic accommodation - 525 rooms	16,169sqm
F2/E/F1 nursery/retail/restaurant/cafes/bars/ visitor space exhibition space/ leisure & sports uses	3,356 sqm

C1 Hotel – 100 rooms		5,334 sqm
E(g)(i) Offices	} 13 buildings	30,359 sqm
E(g)(ii) R &D		30,325 sqm
<b>Total</b>		<b>96,343 sqm</b>

Ancillary car park – 2 buildings 25,501 sqm

Proposed buildings are 2-3 storeys with one element 4 storeys.  
Height reduces to the eastern edge.

Amenity space proposed is 3.5% of total floorspace,  
excluding car park 3,356 sqm

Proposed full time equivalent employees 3,369

This application is for an urban campus-type development with potential to create a place for learning exchange and collaboration between academia, industry and government, and to build a Knowledge Quarter knitting Bushfield Camp into the urban environment as a natural extension of the city.

## 2.2 Policy

### LPP1

Policy WT3 in LPP1 states that the allocation of 20 hectares of land at Bushfield Camp for Employment use must meet the following criteria:

*Delivers necessary, social, economic or environmental development which could not be otherwise be accommodated within or around Winchester, does not compete or detract from the town centre, is compatible with the provision made elsewhere through this strategy, and reflects other policy statements prepared by the Council including the Vision for Winchester.*

(Para 4.41 supporting text to Policy WT3)

The above policy enables the development of this site to meet future, currently unidentified needs.

### WCC Employment Land Study Stantec 2020

Para 4.62 of this study states:

*Based on our study, unlocking this employment land (Bushfield Camp) could account for the shortage of industrial land, particularly in Winchester Town. Policy WT3 is not supportive of uses that may compete with the town centre; an employment campus comprising offices could constitute competitive development in this sense, particularly with the Station Approach development due to deliver office space in Winchester Town soon. It is accepted that offices forming part of an employment campus could cater for a different market to those seeking to locate in Winchester Town. But this depends on its design and the amenities made available.*

Para 4.63 states:

*It is our view that Bushfield Camp holds the capacity to alleviate the shortfall in high quality*

*industrial floorspace that Winchester Town is lacking.*

### **2.3 Comment**

In response to para 4.41 (supporting text to Policy WT3) made ten years ago, this remains a speculative application to meet an unidentified need.

The application does not explain the rationale for providing 30,325 sqm of space for R&D. For example, R&D space at the University of Southampton Science Park – which is an annex to nearby Southampton University – is occupied by start up technology businesses created by University researchers who are commercializing intellectual property into business opportunities. There is no equivalent in Winchester.

The application is described as ‘phased employment-led mixed use scheme’, and not for a development ‘allocated as an Employment Site’ in Policy WT3.

Including parking, more than one third of the proposed floorspace is not for business use ie Classes E (g) (i) and E(g) (ii) R&D, but for academic floorspace, sports centre, gym, central hall, nursery, retail, cafes, an accommodation block and a hotel.

The ambiguity of purpose reflects the nature of policy WT3, which was never based on an intrinsic local economic “need” for any particular type of employment floorspace (eg to rebalance the local economy away from a declining sector towards to a growing sector) nor on evidence of a local economic demand for business floorspace.

The 2020 Stantec Report, prepared to provide evidence to support the employment provision for the local plan review, was compiled in 2020 and uses 2011 census data. It was written before the pandemic and the resultant move to working from home and hybrid working, which has significantly reduced the demand for new office space.

In August 2023 the Council delayed preparation of the new local plan for reasons including:  
*the need to commission a Town and Employment Study to help understand the local economy better. The last studies took place before Covid 19 and much has changed in that time. The timing of these studies is critical to allow enough time following the Pandemic for the economy to settle, so that fair assessment is undertaken.*

The implication of this need for evidence is that the application should not be determined until the studies have been undertaken and fully considered in conjunction with representations on the Reg 18 local plan. This would not be until mid 2025 when modifications are expected after the inspector’s report.

### **3.0 Impact on Town Centre**

No supporting evidence of the need for employment land was provided at the 2013 Local Plan Examination in Public when land was shown in the draft plan as an opportunity site, or in the Inspector’s report that included a modification that was later adopted by the Council that the land should be allocated as an Employment site.

Since that allocation was made in 2013 no planning application for pure employment use – office development or business park – has been made.

The application is proposing a wider range of uses than Employment use as set out in Policy WT3. It is evident that the wider range of uses along with ancillary uses being provided in the Concept Masterplan have been made in response to draft policy W5 of the unadopted Reg 18 Local Plan, but this has yet to be subject to examination.

Policy WT3 for Bushfield Camp requires development that does not compete or detract from the town centre. As stated in section 2.2 of this submission, the Stantec Employment Land Study is not supportive of uses proposed for Bushfield Camp that may compete with the town centre.

LPP2 proposes sites for mixed use developments in Winchester Town Centre that include employment uses in the following policies:-

- Policy WIN 4 Silver Hill Mixed Use site, now supported by adopted Supplementary Planning Document, Central Winchester Regeneration 2018
- Policy WIN 5 Station Approach Area Redevelopment Principles
- Policy WIN 6 The Carfax Mixed Use Site
- Policy WIN 7 The Cattle Market Mixed Use Site

Since these allocations, further sites have become available for development at River Park (subject to the resolution of issues about ownership and covenants) and the site of the former police station in North Walls.

All these sites could provide accommodation for research and development and academia and regenerate sites that need development and comply with Policy DS 1 – a presumption in favour of sustainable development that improves economic, social and environmental conditions. In turn these developments could enhance the town centre economy by generating business for shops, cafes, restaurants and hotels. All the sites, which form a network along the northern edge of the town centre, are well served by road and rail public transport and park and ride sites.

With more than 3,300 full time equivalent employees accommodated in over 90,000 m2 of development at Bushfield – located remotely from the town centre and conveniently close to J10 of the M3 and served by extensive car parking – this will divert significant activity and employment from the town centre, including projects to revitalise the historic areas. The proposal for the magnitude and range of uses proposed for Bushfield Camp should be of some concern to the City Council about the impact on viability that this application could have on developments they are promoting to regenerate town centre sites.

Policy WT3 requires that the allocation and development of land at Bushfield Camp for employment does not compete or detract from the town centre.

The Council acknowledges the need to have an up to date Employment Land Study to inform the current Local Plan Review. This should offer evidence-based guidance on employment need, and direction on where land should be allocated to meet the need. Priority should be given to sites in the town centre to generate investment for regeneration projects that have a long history of waiting to be developed.

## **4.0 Impact on Landscape Setting**

### **4.1 Proposed development**

Applicant's Planning Statement para 9.36 states:

*...it is important to recognise that the ability to build a new knowledge quarter via a genuine mix of uses is key to knitting Bushfield into the city's urban environment as a natural extension of the cityscape.*

Para 9.81 states:

*Built development has been focussed on the previously developed camp site and reflects 17 ha of built form, well within the 20 ha of allocated space within Policy WT3.*

Para 9.86 states:

*The building form and layout have been carefully considered to create new views in and out of Bushfield. For example the layout of buildings in the north-east and south-west corners have been arranged to capture the views of St Catherine's Hill, and the recreation route has been expanded to frame views through the site when viewed from St Catherine's Hill.*

Para 9.89 states:

*The proposed buildings are generally 2-3 storeys in height above ground level, with one element of 4 storeys limited to the least sensitive location of the site. The height reduces to the eastern edge, creating a lower rise setting adjacent to Eastern Meadows. Along Badger Farm Road, the building heights will be visible and create a new sense of arrival to Winchester from the south. Building heights have been developed to respond sensitively to key views to the east and from St Catherine's Hill in particular. The Height Parameter Plan defines the maximum height from the ground floor of future buildings. Plots visible from sensitive locations, including St Catherine's Hill, will have pitched roofs. The Height Parameter takes into consideration the topography and visibility of the site's location, ensuring that the overall massing and scale sits sensitively within the site.*

Para 9.102 states:

*The masterplan for Bushfield seeks to retain and protect existing valuable landscape features and work with the intrinsic landscape characteristics of the locality to blend the development into its setting. This has resulted in a concept for the built environment to be aligned to the site's topography, protecting wooded skylines with a layout that limits development to within the least visually sensitive area, the former army camp. This will allow for tree-lined vistas through the site, connecting into the surrounding hedgerows and tree belts to help knit the development into the pattern and grain of the wider landscape.*

### **4.2 Policy**

Policy WT3 requires development of Bushfield Camp to –

*be of exemplary design and configuration so as to have an acceptable impact on the setting of Winchester, the South Downs National Park and the wider area, retain key views, and take into account its unique gateway character and the various designations that affect the site and its surroundings;*

and

*Only schemes which incorporate an innovative and progressive approach, resulting from assessing the needs of the town and community views, and satisfy the above criteria and other relevant policies in this Plan will be favourably considered.*

In 2002, the City Council published a Landscape Character Assessment of the District prepared by Terra Firma, landscape architects. Bushfield Camp came within Character Area 1 – the Hursley Scarplands. The assessment recognised that, ‘The chalk downland of Oliver’s Battery, Badger Farm and Bushfield forms an important backdrop to the views of St Cross from St Catherine’s Hill’.

Local Plan Policy CP 19 – South Downs National Park states that:

*New development should be in keeping with the context and the setting of the landscape and settlements of the South Downs National Park...Development within and adjoining South Downs National Park which would have a detrimental impact to the rural character and setting of settlements and the landscape should not be permitted unless it can be demonstrated that the proposal is of over-riding national importance, or impact can be mitigated.*

Para 9.104 of the Applicant’s Planning Statement states that:

*The design development and iterative process have sought to minimise effects on views from SDNP, Winchester City and surrounding settlements and in particular Compton...The key concepts are to:*

- *Provide new structural tree planting... particularly in the north east corner of the site which is most exposed to views from the SDNP.*
- *A lighting design which includes measures such as dimmable lighting, a maximum height of 6m lighting columns and colour of light used.*

### **4.3 Comment**

The site is within an area of great landscape value and sensitivity that extends from the urban edges of Stanmore to the north, Badger Farm and Oliver’s Battery to the west, the railway line and the South Downs National Park to the east and to Yew Hill and farmland south of Badger Farm Road to Compton. The landscape character is a topography of open, rolling chalk downland.

Bushfield Camp is part of the southern landscape setting for Winchester. To the west, on leaving Badger Farm and proceeding east down Badger Farm Road, a wide and distant vista of rural chalk downland emerges, stretching towards Twyford and the South Downs National Park. To the east within the Park is St Catherine’s Hill. From the Hill are panoramic views of the City, the Itchen River valley, the medieval complex of St Cross Hospital, Bushfield Down to the north of the camp site and the downland countryside of the camp site and the farmland to the south towards Compton. This is an area of exceptional landscape value.

The application is supported by a diagrammatic layout showing a high site coverage of the site with around 17 buildings, 2-3 storeys high with one building 4 storeys high. Buildings in the north-east and south west corners have been arranged to capture views of St Catherine’s Hill. Along Badger Farm Road the building heights will be visible and create a new sense of arrival to Winchester from the south.

115 documents have been submitted to support this outline application. Not one of the documents appears to have included a site survey showing contours, features and existing



vegetation. A site survey is a fundamental piece of information required before embarking on any development.

Gillespie's Table 2.7 'indicative criteria for assessing likely magnitude of visual change', gives a methodology for evaluating the impact of development on the existing landscape. The higher category could be applied to the setting which includes the landscape of St Cross, St Catherine's Hill and connection beyond to the South Downs National Park and the natural landscape of the southern approach to Winchester. The topography plan needs accompanying sections to show visual alignments. This is key information for demonstrating how the development is to be viewed. Is the approach one of concealment or a composition that accepts some openness to the proposed buildings? What is proposed suggests the latter, as indicated in Para 9.86 of the Planning Statement.

The parade ground is 81m AOD and St Catherine's Hill is 97m AOD. Buildings between 11 and 17 metres in height will be visually intrusive in views from St. Catherine's Hill (Appendix D3 AVR-01) and the National Park, especially in winter. Another significant impact is shown in the Illustration of a viewpoint to the south, from the footpath by Attwoods Drove Farm in the local gap between Winchester and Compton Street (Appendix D3-AVR-07).

The end of para 9.86 states: "Plots visible from sensitive locations, including St Catherine's Hill will have pitched roofs. The Height Parameter takes into consideration the topography and visibility of the site's location ensuring that the overall massing and scale sits sensitively within this."

Para 9.102 implies that the development will be visually intrusive and the illusion of open chalkland free of buildings will be changed and have a detrimental impact on the adjoining South Downs National Park.

## **5.0 Rural Site Outside the Urban Edge**

### **5.1 Policy**

Local Plan Policy DM 23 - Rural Character states:

*Outside defined settlement boundaries, development proposals which accord with the Development Plan will be permitted where they do not have an unacceptable effect on the rural character of the area, by means of visual intrusion, the introduction of incongruous features, the destruction of locally characteristic rural assets, or by impacts on the tranquillity of the environment.*

*The following factors will be taken into account when considering the effect on the rural character and sense of place:*

*Visual – intrusion should be minimised, including the effect on the setting of settlements, key features in the landscape, or heritage assets. The cumulative impact of developments will be considered, including any ancillary or minor development that may occur as a result of the main proposal.*

*Physical – developments will be encouraged to protect and enhance the key characteristics of the landscape and should avoid the loss of key features or the introduction of elements that detract from the special qualities of the place. Any re-modelling of the landscape will also be taken into account.*

*Tranquillity – developments should not have an unacceptable effect on the rural tranquillity of the area, including the introduction of lighting or noise occurring as a result of the development, taking into account of the relative remoteness and tranquillity of the location. New lighting will generally not be permitted in unlit areas and the type, size and design and operations of any lighting may be controlled where necessary by the use of conditions.*

## **5.2 Comment**

The Bushfield Camp site is a rural site outside the urban edge of Winchester. The extent of the development proposed and associated activity will have an unacceptable effect on the rural character of the area, by means of visual and physical intrusion and the tranquillity of the area and be contrary to Policy DM23.

## **5.3 Policy**

Local Plan Policy MTRA 4 - Development in the Countryside states that:

*In the countryside, defined as land outside the built-up areas of Winchester, Whiteley and Waterlooville and the settlements covered by MTRA 2 and 3 above, the Local Planning Authority will only permit the following types of development:*

- *Development which has an operational need for a countryside location, such as for agriculture, horticulture or forestry; or*
- *Proposals for the reuse of existing rural buildings for employment, tourist accommodation, community use or affordable housing (to meet demonstrable local housing needs). Buildings should be of permanent construction and capable of use without major reconstruction; or*
- *Expansion or redevelopment of existing buildings to facilitate the expansion of on-site established businesses or to meet an operational need, provided development is proportionate to the nature and scale of the site, its setting and countryside location; or*
- *Small scale sites for low key tourist accommodation appropriate to the site, location and the setting.*

*Development proposed in accordance with this policy should not cause harm to the character and landscape of the area or neighbouring uses, or create inappropriate noise/light and traffic generation.*

## **5.4 Comment**

In the countryside, defined as land outside the built up areas of Winchester, the Local Planning Authority will only permit the types of development described in the policy above. The policy sets out a range of developments, none of which include new buildings for employment use.

A requirement of Local Plans is that they be internally consistent. It is assumed that when considering Policy WT3 for development outside the built-up area of Winchester and Policy MTRA 4, that Policy WT3 takes priority in status.

## **6.0 Settlement Gap**

### **6.1 Policy**

Local Plan Policy CP18 states that:

*The Local Planning Authority will retain the generally open and undeveloped nature of the following defined settlement gaps:-*

*Winchester-Compton Street*

*Within these areas only development that does not physically or visually diminish the gap will be allowed.*

### **6.2 Comment**

The site is within the Winchester-Compton Street settlement gap. The concept of a settlement gap is widely understood and appreciated. It controls the spread of conurbations or ribbon development and enables settlements to retain separation and identity.

The extent of development proposed for Bushfield Camp would not retain the generally open and undeveloped nature of the land that forms the gap between the southern urban edge of Winchester and Compton. If this development were allowed, it would physically and visually diminish the gap.

## **7.0 Nature Conservation**

### **7.1 Proposal**

Para 5.4 of the applicant's Planning Statement states that 2.54 ha of grassland habitat lost as part of the proposed development will be replaced by 6 ha of new calcareous grassland habitat on arable fields east of the camp site.

### **7.2 Policy**

Local Plan Policy CP16 – Biodiversity states that:

*The Local Planning Authority will support development which maintains, protects and enhances biodiversity across the District, delivering a net gain in biodiversity, and has regard to the following:*

- protecting sites of international, European, and national importance, and local nature conservation sites, from inappropriate development*
- new development will be required to show how biodiversity can be retained, protected and enhanced through its design and implementation, for example by designing for wildlife, delivering BAP targets and enhancing Biodiversity Opportunity Areas.*
- new development will be required to avoid adverse impacts, or if unavoidable ensure that impacts are appropriately mitigated, with compensation measures used only as a last resort. Development proposals will only be supported if the benefits of the development clearly outweigh the harm to the habitat and/or species.*

*Planning proposals that have the potential to affect priority habitats and/or species or sites of geological importance will be required to take account of evidence and relevant assessments or surveys.*

In 2005, prior to the Winchester District Plan 2006, the Council as part of its Biodiversity Action Plan produced a consultation brief on Bushfield Down and Bushfield Camp. This recognised the significance of this area of chalk downland.

A large area of the Down and Camp is designated as a Site of Importance for Nature Conservation (SINC), for its rare chalk grassland, which is currently unmanaged. This is a non-statutory designation. SINC's are of local conservation interest and identify the need for them to be protected from development that would have an adverse impact upon them, unless the need for development outweighs that impact.

### **7.3 Comment**

Policy CP16 requires that any development, especially on such a sensitive site, must show clear benefits that outweigh inevitable harm to habitats and species, such as those caused by traffic, noise and light pollution, or lay out proposals of how such harm will be mitigated. Nature conservation on this site is too important to be a reserved matter. The City Council needs to see a comprehensive Landscape Management Plan for approval. Without this, they cannot judge how the nature-development trade-off will work.

## **8.0 Transport, Access and Parking**

### **8.1 Proposal**

Pages 28-30 of the applicant's Planning Statement paras 7.28, 7.31 and 7.32 state that:

*The transport strategy for the Proposed Development seeks to integrate with the local transport networks and it is noted that a significant proportion of both pedestrians and cyclists are likely to access the site from the north.*

and

*A provision of 1055 car parking spaces is proposed.*

*Sustainable alternatives [to the private car] will be offered including a private regular shuttle bus service between the site and Winchester railway station, a car club and electric bikes.*

The majority of spaces are in two multi storey car parks. The car park is to serve 3369 full time equivalent employees, academic accommodation of 525 rooms and a 100 bed hotel. One vehicular access point is proposed from Badger Farm Road. There would be pedestrian/cycle access to new bus stops, serving South Park and Ride and City Centre on Badger Farm Road, St Cross roundabout, Whiteshute Ridge and Ivy Close Stanmore.

### **8.2 Policy**

Local Plan Policy CP10 – Transport states:

*The Local Planning Authority will seek to reduce demands on the transport network, manage existing capacity efficiently and secure investment to make necessary improvements. Development should be located and designed to reduce the need to travel. The use of non-car modes particularly walking and cycling should be encouraged through travel plans, management and improvements to the existing network, and improvements to accommodate additional traffic should be undertaken (or funded) where necessary.*

### 8.3 Comment

The evidence provided by the applicant strongly indicates that the proposed development will generate a significant increase in the amount of traffic. In this rural location, close to J10 of the M3, despite measures for a dedicated bus service, car sharing, cycling and walking, the overriding form of transport for 3000+ employees will be the private car. The location means that transport emissions will be disproportionately high in relation to the level of employment activity proposed. This compares poorly to employment being provided in town and city centres.

The South Winchester Park and Ride site provides 858 standard spaces, closes at 9 pm and is served by buses that operate Monday to Saturdays only. The adequacy of providing 1055 car spaces to serve 3369 employees, plus the 525 occupants in academic accommodation and 100 occupants of a hotel, has to be measured against the car parking standards of Hampshire County Council and the sustainable alternatives to the use of the car.

The application produces mitigation measures to reduce the need to use the private car. The location and surrounding topography do not offer an attraction for cycling and walking. The location of this development will increase rather than reduce the need to travel and the additional traffic generated will increase demands on the road network. Despite the mitigation measures being proposed and the proposals being presented, compliance with Policy CP10 is not achieved.

On the traffic modelling and evidence provided, the traffic emissions are inconsistent with the aims of WCC's Carbon Neutrality Action Plan. The comments made by Active Travel England express concern about the amount of traffic that will be generated by the proposed development.

City of Winchester Trust  
6<sup>th</sup> December 2023