

# **Planning Application 22/01934/FUL**

## **Response of Winklebury Regeneration Review Panel (WRRP)**



**Final Version 1.0**

**24<sup>th</sup> October 2022**

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# 1 Executive Summary

Ambitions dashed

It all started so positively. The ambition to regenerate Winklebury was universally supported and included in the Local Plan 2011-29 which said “A masterplan or development brief should be prepared demonstrating that proposals will positively support and complement the comprehensive wider development of the area”. (Policy SS2, Basingstoke and Deane Borough Council (BDBC) Local Plan 2011-2029).

Accordingly, in 2018, Winklebury residents, Hampshire County Council (HCC), BDBC, the Clinical Commissioning Group (CCG), residents’ groups, Vivid, the police, local education organisations, and Voluntary Community and Social Enterprises (VCSEs) formed the Winklebury Regeneration Partnership and worked at length to produce plans to regenerate Winklebury. They mutually agreed the problems and challenges that needed to be addressed, which included poor mental and physical health outcomes; pockets of deprivation; limited support for older people, families, and people with mental health problems; high incidence of long-term sickness; and the unfitness of Winklebury’s health centre and two community centres.

The Partnership developed a strategy that positively supported and complemented the wider development of the area, and would deliver significant benefits to the community. The Winklebury Hub Masterplan of January 2019 included a one stop health and wellbeing hub, co-located with open space on Fort Hill, in the heart of Winklebury to serve the 15,000 residents of Winklebury and Manydown. The hub would replace the old General Practitioner (GP) surgery and the ageing community centres.

The strategy was well received, being supported by the residents, HCC, BDBC, the CCG and VCSEs. Accordingly, BDBC identified how the project would be funded, which included replacing the old BDBC-owned community centres and health centre with housing. The CCG included the health and wellbeing hub in its North Hampshire Health and Care Transformation Plan 2018-2023.

For reasons never fully explained, those plans for Winklebury’s regeneration were ditched by the Borough Council later in 2019. They were replaced by the plans in this application (22/01934/FUL), which Vivid’s Chief Executive Officer (CEO) describes as “unashamedly housing-led”. The one-stop health and wellbeing hub surrounded by open space became a nine room GP surgery squeezed into a small site. One of the community centres was demolished and the other, still in a poor state of repair and would require substantial investment to meet BDBC’s zero carbon target, was left to limp on. Houses were to be built on Fort Hill and the playground at Carisbrooke Close.

The local community saw the revised proposals as unsatisfactory, failing to meet the original, universally agreed ambitions. The new GP surgery cannot provide the range of health and wellbeing services required under NHS and HCC policy. A small 178sqm community facility squeezed into the ground floor of the Winklebury Centre would become the only community facility in Winklebury once the Sycamore Halls are forced to close through old age.

Winklebury’s loss of community facilities would continue: the Sycamore Halls are on their last legs, Basingstoke Day Services, the Play Council, Fort Hill Community Centre and the Harlech Hall Community Centre have already closed. An area already inadequately served, compared to other areas in Basingstoke, will fall further behind.

The new plans miss the opportunity to provide a community facility co-located with open space. It's not that the open space doesn't exist – it's there, on the empty HCC-owned Fort Hill site. It is the will and ambition to exploit it properly that is lacking.

It is galling that all over the Borough (Popley, Oakridge, Chineham, Oakley, Overton, Beggarwood, Brighton Hill, Tadley, Kempshott, Rooksdown, Old Basing and more) the obvious benefits of having community facilities next to open space have been seized, but the Winklebury plans fail to do so.

In fact, the Vivid plans will cause a reduction in open space, when houses are built on the playground in Carisbrooke Close. This will add to the 21ha deficit of open space in Winklebury. Over 100 trees will be lost. Parking problems will be made worse, as significantly fewer spaces will be provided than stipulated in the BDBC Parking Supplementary Planning Document (SPD).

The scheme is incomplete, as it has failed to include the redevelopment of the Three Barrels pub site. At present, the prospect is that this derelict public house will remain to mar the look of the whole area.

The regeneration proposals are a missed opportunity, lacking in imagination and ambition. They are formulaic and bear scant regard to the positive vision that was agreed by all parties when the project started. Though the applicant may argue that they are an improvement on what is there now, they offer only 'newness' and not the long-term step-change that the community thought it was going to get.

Since the Winklebury community first saw the Vivid plans, it has argued that they do not deliver on the objectives that were agreed. Over 15% of residents signed a petition within 2 weeks calling for the plans to be reviewed, particularly with regard to the poor provision of community facilities.

The Borough Council supported Winklebury's request by passing a motion calling for that review to take place (please see Appendix 2). There has been no review. Vivid has made a few changes to the plans, but has not addressed their fundamental weaknesses.

This report sets out detailed arguments on why the plans are wrong and what needs to be done. We hope you find them interesting. As you read them, please bear in mind one simple message:

These plans represent what Vivid wants, and not what Winklebury needs.

## 2 Introduction

The purpose of this submission is to set out the response of the Winklebury Regeneration Review Panel (WRRP) to the proposed development by Vivid (ref application 22/01-34/FULOUT.) This response sets out objections to the development in Winklebury. It has been prepared with the support of Steve Lees, Member of the Royal Town Planning Institute (MRTPI), an independent planning consultant.

The WRRP may submit further representations in response to those of the consultees contacted by BDBC and further evidence provided by the applicant.

Where the policies and text of the Local Plan (2011-2029) are quoted, the extracts are presented in italics.

The WRRP was formed after the councillors of Basingstoke and Deane Borough Council voted overwhelmingly to support a motion for review of the Winklebury regeneration proposals at the meeting on 24th of March 2022. The members of the panel are:

Chair: Mark Peters, Chair of the WRRP and Winklebury and Manydown Community Action Group (WMCAG)

Vice Chair: Carlos Morono, Vice Chair of the WRRP

Cllr: Abigail Compton-Burnett, Borough Councillor for Winklebury and Manydown  
Sophie Conde, Vice Chair of WMCAG

Cllr Angie Freeman, Borough Councillor for Winklebury and Manydown

Shirley Keer, Trustee of Sycamore Halls, Winklebury

Cllr Alex Lee, Borough Councillor for Winklebury and Manydown

Cllr Andrew McCormick, Borough Councillor for Brighton Hill

Cllr Arun Mummalaneni, County Councillor for Basingstoke North West

Cllr Stephen Reid, County Councillor for Basingstoke South West

Cllr Diane Taylor, Chair of the Manydown Overview Committee

Rev John Wigmore, Rector of the Parish of Winklebury and Worting

## **3 The Proposal**

### **3.1 Summary**

Vivid Homes Ltd have submitted proposals for development at Winklebury, Basingstoke comprising: "Full application for the redevelopment of the Winklebury Centre; Former Fort Hill School; Land at former Newman Bassett site, off Coppice Mews; Basingstoke & Deane Borough Council open space, off Carisbrooke Close; former Play Council site and other land including the demolition of buildings as illustrated and the provision of 203 residential dwellings (C3), 652sqm retail space (Class E), 706sqm medical centre (Class E) including Doctor's surgery and pharmacy, 225sqm pre-school (Class E) and 178sqm community facility (Class F2) with associated parking, landscaping and public open space. Land At Winklebury Regeneration Winklebury Way Basingstoke Hampshire".

### **3.2 Housing provision**

The application form sets out details of the housing provision, comprising 108 market homes, 52 social/market rent and 22 affordable home-ownership; a total of 182 dwellings. The supporting Planning Statement refers to a total of 203 dwellings, delivering a net gain of 134 (para 5.2 and 5.3).

B&DBC are requested to confirm the total number of homes being proposed, the proposed composition of those homes in terms of size, tenure, and provision for older people and specialist housing.

### **3.3 Non-residential provision**

The application states that 1,761sqm of non-residential floorspace will be provided, comprising 652sqm retail, 225sqm pre-school facility and 178sqm community facility. The application also includes a medical centre, but the size is unclear, because it is stated as 706sqm on the application form, however a figure of new Medical Centre 606sqm (571sqm medical centre and 35sqm pharmacy) is stated on 1160PD601 revB.

The application estimates that the current non-residential floorspace is 1,000sqm, of which 618sqm is retail. It is not clear how the current retail space is calculated, ie does it include the units occupied by shops, the units occupied by the dental surgery, the units occupied by the pharmacy and surgery, the unoccupied units? It is, therefore, difficult to assess whether the 652sqm of retail space proposed by the plans represents an increase in the total retail space in the Winklebury Centre, or just an increase in the occupied retail space. It is also unclear whether the dental surgery will continue to operate in the units it occupies in the Winklebury Centre, whether it will have to move to other units in the Centre, or whether it will have to move out of the Centre, which will further deplete local community amenities.

BDBC are requested to confirm with the applicant the size of the proposed medical centre and the proposed pharmacy.

BDBC are also requested to confirm with the applicant the current floorspace for the retail units (occupied and unoccupied), community facilities (Play Council building) and the GP surgery, the pharmacy and the dental surgery, so that there is a clear understanding of the impact of the proposed development on the capacity of the Winklebury Centre to serve the local community.

## 4 Background

### 4.1 Ward profile

The ward profile for Winklebury advises that the population is just under 7,000. It has an ageing population and it is expected that 20% of this population will be over 65 and 5% will be over 80 by 2023. Of those over 65, 43% have their day-to-day activities limited, because of health related issues (Office of National Statistics 2011).

Much of Winklebury is among the 40% most deprived neighbourhoods in the UK.

The population of Winklebury has poorer health outcomes and increased risk behaviours than Basingstoke and Hampshire in almost every health and care indicator, including adult and children's obesity, adult and children's emergency admission rate, binge drinking and alcohol related harm, low prevalence of healthy eating, higher self harm admissions and premature mortality rate.

The Mental Health and Wellbeing Index is used to assess the mental health and wellbeing of people and communities within each ward in Hampshire. The data are presented in three domains. Winklebury is in the.

- 3rd lowest decile for the Support domain, which includes education, material wellbeing, health and life satisfaction.
- 2nd lowest decile for the Self Domain, which includes strong and stable families and social capital
- 2nd lowest decile for the Systems and Structure domain, which includes enabling infrastructure, local economy, effective public service and crime and anti-social behaviour.

### 4.2 Loss of community facilities and employment opportunities

Winklebury has experienced a litany of loss of local community facilities and employment opportunities (please see Table 1 below) over the past 10 years. These community facilities and employment opportunities have not been replaced in Winklebury.

Name	Postcode	Use	Owner	Status
Basingstoke Day Services	Ashwood Way, RG23 8AA	Community Hub for local community activities, events and other functions	HCC	Demolished and replaced with housing
Fort Hill School and Community Centre	Fort Hill RG23 8JQ	Secondary school and community centre. Extensive use of the facilities by local residents for community activities including sport, cookery, fayres, arts and crafts.	HCC	Demolished – plans to build houses and pre-school on the site (22/01934/FUL)
Harlech Hall	Harlech Close RG23 8QN	Community building for community activities	Sold at nil value by BDBC to Vivid	Demolished and replaced with 7 houses



Play Council	RG23 8BN	After school care with a range of activities for children.	BDBC	Demolished – plans to build dwellings and medical centre on the site (22/01934/FUL)
Ashwood Business Park	Ashwood Way	Three three-storey office blocks providing a combined floorspace of more than 72,000 sq ft.	HCC?	Replaced with 133 flats in 2020
Newman Bassett House	Warwick Road RG23	Residential care home for people with dementia – 47 places	HCC	Demolished – plans to build houses on the site (22/01934/FUL)
Roman House	Winklebury Way	Residential care for people with learning disabilities – 26 people	BDBC	Closed in August 2019, apart from 2 bungalows

**Table 1: Community facilities and employment opportunities in Winklebury that have closed or planned to be closed over past 10 years**

Winklebury currently has very limited community and employment opportunities, when compared with other areas of the borough. The 22,000sqm business park was recently replaced by flats, so the only employers of any size are now Aldi and Farm Foods supermarkets.

The only remaining community facility of significant size (the other facility is just a small room) is in a poor state of repair, would require substantial investment to meet BDBC’s zero carbon target and is not collocated with open space. The community provision is, therefore, very poor, particularly when compared with other parts of the borough, such as Popley, Rooksdown, Beggarwood, Brighton Hill, Oakridge, Chineham, Tadley, Old Basing, Oakley, Overton, Norden, Whitchurch.

The current proposals by Vivid have been the subject of limited involvement by the local community. The lack of community involvement is addressed in more detail in the assessment of the plans against “Policy SS2 – Regeneration” in this submission.

There is a strong case for a comprehensive review of the needs of the community and the preparation of a masterplan for the ward to meet those needs by the various key stakeholders active within the ward in close association with the local community.

## 5 Planning context and the WRRP's response

### 5.1 The Development Plan

**The WRRP considers the proposals to be contrary to the objectives of the adopted Local Plan.**

The starting point for a Local Planning Authority (LPA) in considering proposals for development is the Development Plan for the area. Applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise (section 38(6) of the Planning and Compulsory Purchase Act 2004).

The National Planning Policy Framework (NPPF) (para 11), advises that, for decision-making, development should be approved which accords with an up-to-date Development Plan. Where a plan does not include relevant policies or it is out-of-date, permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies of the NPPF taken as a whole.

The Development Plan for the area within which the application is located comprises the Basingstoke and Deane Local Plan 2011-2029 adopted in May 2016 and the Hampshire Minerals and Waste Local Plan 2013. The shortfall in the five-year supply of housing land for the borough does not, in the WRRP's view, mean that the relevant policies in the Local Plan 2011-2029 (2016) should not be considered up-to-date. They are consistent with the relevant policy advice in the NPPF (2021).

The Local Plan identifies a number of objectives to deliver the Council's Vision. Of relevance to the current application are:

Section 2.8 g) *Ensure that infrastructure is planned for prior to development and delivered alongside development to meet the changing needs of our residents and employers, including the broader infrastructure needs of an increasingly ageing population. This will include the provision of flexible accommodation that responds to varying needs and supports mixed and inclusive communities with the opportunity for social interaction.*

*h) Provide new housing which incorporates a mix of tenure, size and type to meet the borough's needs and enable accommodation for all, including older people and downsizers, smaller households, families, and resident gypsy and travellers.*

*i) Promote and support successful regeneration and renewal schemes to improve social, built and natural environments, and improve housing and employment areas of poor quality. This will be delivered through a partnership approach and close working with local communities and businesses to address existing pockets of deprivation and reduce inequalities at a neighbourhood level.*

*j) Promote healthy lifestyles by maintaining and enhancing the quality and value of community, health, cultural, leisure and recreational facilities and open spaces that support and provide opportunities for participation in social and physical activity in local communities and good access to health services.*

*l) Ensure high quality and locally distinctive design which responds to local character to create inclusive, well connected and safe neighbourhoods by reducing the fear of crime and anti-social behaviour.*

*o) Proactively manage the borough's rich historic and built environment to protect and enhance its quality and distinctiveness while accommodating change.*

For the reasons set out in this response the WRRP considers that the proposals are in conflict with these objectives

## **5.2 The Spatial Strategy**

### **The WRRP considers the proposals to be contrary to the Spatial Strategy of the Local Plan.**

The context for the detailed policies set out in the Local Plan is set by the Spatial Strategy, which is outlined in paragraph 3.2

*The Local Plan will direct new development to previously developed sites first and encourage regeneration whilst also delivering new and sustainable communities around the borough's main settlements. Our partnership approach to regeneration will continue to deliver new high quality homes in those areas built during the time of the town's expansion. Over the life of the plan we will seek to improve parts of the borough where housing stock is of a poor quality or the general social or physical environments of an area could be improved. Such developments will contribute towards meeting housing need and raising the living standards of our residents. Development should seek to enhance both the general environment and help engender a feeling of pride through the improvement of residents' quality of life. Homes will be delivered to respond to the needs of our community including meeting the needs of our ageing population, facilitating downsizing and providing an opportunity for our residents to get on the housing ladder.*

For the reasons set out in this response, the WRRP considers that there has not been a partnership approach, the proposed development will not engender a feeling of pride in the community, and it will do little to improve its residents' quality of life or to meet its needs.

The Spatial Strategy emphasises the importance of the Borough's green infrastructure

*The Local Plan sets the framework for protecting, maintaining and enhancing the borough's green infrastructure network, the countryside and biodiversity to ensure residents and visitors alike continue to enjoy outdoor activities that promote health and well-being and that these assets are protected for their own sake. This includes protecting existing areas of open space which are highly valued by the community, restricting further fragmentation of the green infrastructure network and improving linkages between spaces, encouraging further access to the countryside and providing new high quality spaces in association with new development to meet growing and changing needs. (para 3.10)*

For the reasons set out in this response, the WRRP considers that the proposed development will not protect existing areas of open space which are highly valued by the community, and the existing green infrastructure and biodiversity will be diminished by the loss of a significant number (110) of trees and reduction in open space.

*Cultural and leisure facilities will be protected and enhanced, meeting the needs of residents and encouraging additional visitors to the borough by offering new and exciting leisure opportunities.*

For the reasons set out in this response, the WRRP considers that the proposals will not meet the needs of the existing residents and those of the proposed new homes.

## 6 Local Plan policies and the WRRP's response

### 6.1 Policy SD1 Presumption in Favour of Sustainable Development

#### **The WRRP considers the proposals to be contrary to Policy SD1**

The purpose of the planning system is to contribute to the achievement of sustainable development. The objective of sustainable development is to meet the needs of the present without compromising the ability of future generations to meet their own needs (para 7 of the NPPF).

The Local Plan policy echoes the advice in the NPPF. It supports sustainable development without setting out what is meant by that and what would constitute sustainable development. The wording of the policy is written in positive terms in respect of development which is sustainable. That being the case, the Council should refuse development which is not sustainable.

These plans do not meet the needs of the present, because they fail to provide the medical and community facilities that current residents need. They also compromise the ability of future generations to meet their own needs, because they build houses on the only land in Winklebury (Fort Hill) that is large enough to accommodate the community facilities that local residents need, is collocated with open space (Local Plan policy) and is, therefore, financially viable (a key tenet of the BDBC Strengthening Community Strategy 2021).

For the reasons set out in this submission and the conflict identified with other policies of the Local Plan, it is considered that the proposals do not deliver sustainable development and are therefore contrary to Policy SD1 and the presumption in favour does not apply.

### 6.2 Policy SS1 Scale and Distribution of New Housing

#### **The WRRP considers the proposals to be contrary to Policy SS1a)**

*"Within the period 2011 – 2029, the Local Plan will make provision to meet 15,300 dwellings and associated infrastructure. This will be provided by:*

- a) Permitting development and redevelopment within the defined Settlement Policy Boundaries, which contribute to social, economic and environmental well-being"*
- b) Supporting regeneration in line with Policy SS2" (Policy SS1).*

The proposed development would provide a modest contribution of 134 dwellings to the supply of housing within the Borough, which represents 2.7% of the five-year supply land (4,920 at April 2021).

The contribution that the development would make to the social, economic and environmental well-being of the area is very limited:

- The social objective not only includes housing provision, but also the provision of accessible services and open spaces which reflect current and future needs, which the scheme clearly does not.
- In terms of the economic objective, there will be less retail floor space reducing the opportunities for residents to have their daily needs met, necessitating trips out of the neighbourhood, and reducing employment and business opportunities,

which are already very limited following the recent conversion of Ashwood Business Park (22,000sqm) into flats.

- The environmental objective is not met by the proposals, given the loss of open space in an area which already has a significant shortfall (21ha) in open space, and the proposed loss of at least 110 trees.

### 6.3 Policy SS2 Regeneration

#### **The WRRP considers the proposals to be contrary to Policy SS2**

The Local Plan has identified the potential for the regeneration of areas within Basingstoke and, although Winklebury is not specifically mentioned, Policy SS2 is relevant as Winklebury has been identified as a priority for regeneration in other BDBC documents.

The Design and Access Statement states that “The aim of this redevelopment is to regenerate this portion of the Winklebury Estate, in order to deliver new and replacement homes, which will meet local housing need, whilst addressing local issues and funding new facilities and services for the local community. This housing led development will be phased in order to deliver a complex scheme, which also necessitates the decanting of some existing residents in the Winklebury Centre” (Design and Access Statement para 1.2).

The Local Plan states that the Council will support regeneration proposals where they:

- “would result in demonstrable benefit to the local community”
- ‘will require full involvement and consultation with the affected communities”.
- “A masterplan or development brief should be prepared demonstrating that proposals will positively support and complement the comprehensive wider development of the area” (Policy SS2)”.

This section will identify several ways in which the proposals fail to comply with Policy SS2. It will demonstrate that, initially, the local community worked with BDBC and other stakeholders to develop proposals that resulted in demonstrable benefit to the local community, and positively supported and complemented the comprehensive wider development of the area. These proposals were then scrapped and no explanation was given to the community nor the councillors that had helped to develop them.

The community and councillors were then presented with completely different proposals, which had been developed without their involvement. These are the proposals contained in this planning application (22/01934/FUL). Time and again, the community has said that these proposals do not meet the needs of the community, but they have been ignored. In March 2022, the Council passed a motion for the proposals to be reviewed in the light of the concerns of the community, but that motion was also ignored.

#### 6.3.1 Benefit to the local community

This section will demonstrate that the regeneration plans will not result in demonstrable benefit to the local community, based on the criteria used for monitoring Policy SS2 which are prescribed by the Local Plan.

“The policy will be monitored by:

- annual monitoring of housing completions, and
- the monitoring framework set out in the Neighbourhood Renewal Strategy” (Policy SS1).

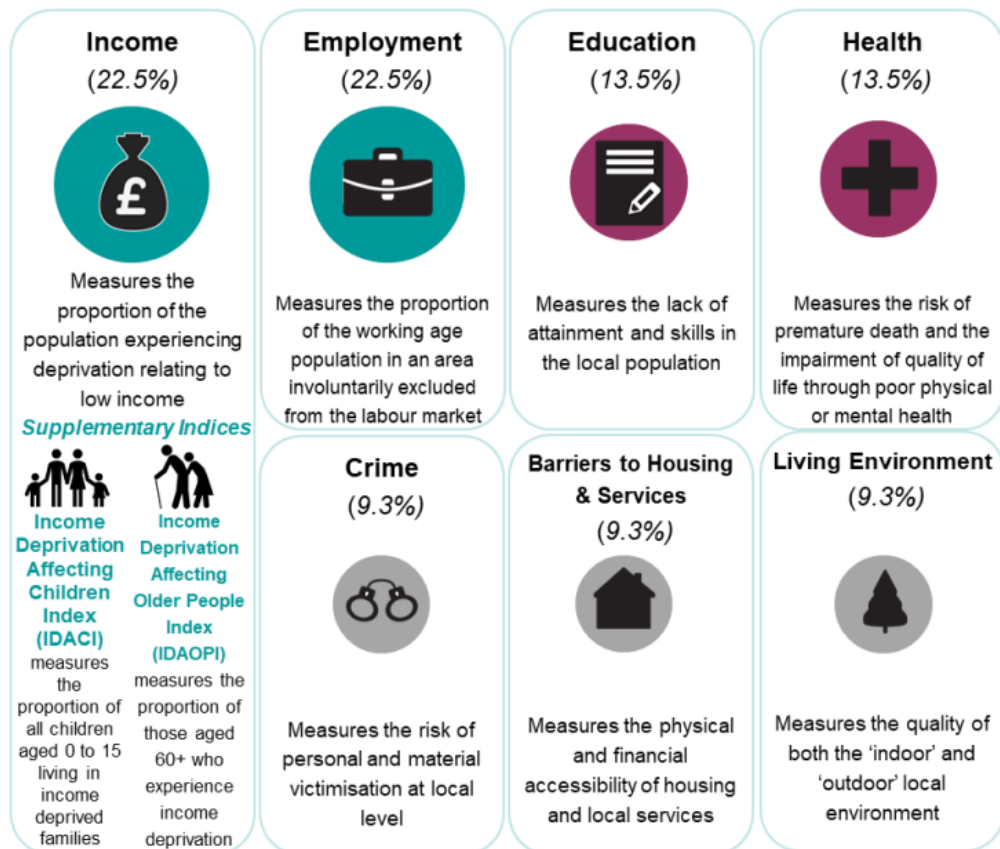
### Housing completions

The regeneration would result in a net increase of 134 homes.

### The monitoring framework set out in the Neighbourhood Renewal Strategy

This framework primarily uses the ‘overall Index of Multiple Deprivation (IMD) 2004’ for baseline data and monitoring.

*There are 7 domains of deprivation, which combine to create the Index of Multiple Deprivation (IMD2019):*



- Income deprivation. Many residents in Winklebury receive low income and these plans fail to reduce the deprivation resulting from that low income. The proposed health and wellbeing facilities cannot provide the support in terms of health services, community groups, mental health support, debt advice, benefits advice that make a huge difference to residents on low incomes. In addition, retail floor space will be reduced. These failures to provide the facilities that meet residents’ needs within their community will prevent many residents, particularly those with low incomes, from accessing the services that they need.
- Employment deprivation. The plans reduce the number of employment and business opportunities in a community that already has minimal job opportunities,

particularly following the recent conversion of Ashwood Business Park (22,000sqm) into flats. In addition, these plans also fail to address other factors that lead to employment deprivation, such as having a disability, mental and physical illness, being a carer, and being part of a lone-parent or large family. They also fail to provide the facilities to provide the health and wellbeing services that would promote mental and physical wellbeing and, thereby, reduce the number of residents unable to work due to long term mental and physical ill-health.

- Education, Skills and Training Deprivation. The plans fail to provide any new education, skills and training. They also fail to provide health and wellbeing facilities that would provide early years support.
- Health Deprivation and Disability. The challenges faced by the Winklebury community include poor mental and physical health outcomes; pockets of deprivation; limited support for older people, families, and people with mental health problems; high incidence of long term sickness; The proposed health and community facilities cannot provide the health and wellbeing services required by the local community. In addition, it is not clear what new housing will be provided for older residents and those with a disability.
- Crime. Hampshire Constabulary has raised several concerns regarding the effect of the plans on crime and disorder. The plans also fail to include facilities that can provide engaging and productive activities for teenagers, which is a key component of the Hampshire Police and Crime Plan 2021-2024.
- Barriers to Housing and Services. The proposed housing fails to meet the needs of local residents, because it fails to prioritise meeting the required housing needs.
- Living Environment Deprivation. The proposals will result in the loss of at least 110 trees and open space in an area which already has a significant shortfall (21ha) in open space. They will, therefore, reduce the opportunity for physical exercise, enjoying the natural world, air quality, and thriving nature. Any improvement in the Winklebury Centre will be marred by the derelict pub in the middle of the centre.

### **6.3.2 Involvement and consultation with the affected communities**

*The National Planning Policy Framework (NPPF) refers to early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area (para 155).*

BDBC's Statement of Community Involvement (SCI) (March 2018), which sets out how the council intends to involve the local community in planning issues, states *"planning directly affects the places where people live and work and meaningful public consultation and engagement on all aspects of planning is vital"* (para 1.1, SCI).

*The SCI, which relates to planning only, complements the council's broader commitment to effective consultation and engagement, access to information, and openness, as reflected in the council's Local Code of Corporate Governance, which outlines the core principle of 'ensuring openness and comprehensive stakeholder engagement (para 1.3, SCI).'*



*Principle Two of BDBC's Local Code of Corporate Governance is Ensuring openness and comprehensive stakeholder engagement, including:*

*(b) Making decisions that are open about actions, plans, resource use, forecasts, outputs and outcomes. The presumption is for openness. If that is not the case, a justification for the reasoning for keeping a decision confidential should be provided*

*(c) Providing clear reasoning and evidence for decisions in both public records and explanations to stakeholders and being explicit about the criteria, rationale and considerations used. In due course, ensuring that the impact and consequences of those decisions are clear*

*(d) Using formal and informal consultation and engagement to determine the most appropriate and effective interventions/ courses of action (Principle Two, Sub-principle 1 "Openness").*

BDBC's Local Code of Corporate Governance regarding Openness (Principle Two, Sub-principle 1) has not been followed in the development of the Regeneration plans. The failure to adhere to the Local Code of Corporate Governance regarding Openness is clearly demonstrated in the development of the proposals for the regeneration, which is described below.

### **Proposals for the Winklebury Regeneration developed in 2018**

In 2018, the Winklebury Regeneration Partnership Group, comprising key stakeholders and the community, developed proposals for the future of the Winklebury Hub as part of a wider regeneration programme for Winklebury.

These proposals were prepared with full involvement and consultation with the affected local communities. Local residents, the Winklebury and Manydown Community Action Group, BDBC councillors and HCC councillors support these proposals, because they positively support and complement the comprehensive wider development of the area.

In 2018, the Winklebury Regeneration Partnership Group worked together to develop proposals for the future of the Winklebury Hub as part of a wider regeneration programme for Winklebury. The Winklebury Hub was defined as the sites of Fort Hill, Newman Bassett, Carisbrooke Close, the Winklebury Centre (the sites covered by this planning application 22/01934/FUL) and Elmwood Parade.

The Winklebury Regeneration Partnership Group included representatives from BDBC (Officers and Councillors), HCC (Officers and Councillors), the NHS Clinical Commissioning Group (CCG), the Winklebury and Manydown Community Action Group, Hampshire Football Association, Aldi, Vivid and Winchester University.

The Winklebury Hub Masterplan demonstrated that these proposals positively supported and complemented the comprehensive wider development of the area. The Masterplan, which was produced in January 2019. It included:

- A summary of issues affecting Winklebury and the Hub
- Appraisal of the Hub Sites
- Vision for the Winklebury Hub
- Strategic Options: The Preferred Approach and Alternative Approaches

- The Winklebury Hub Sites: Development Principles and Delivery
- Issues affecting Winklebury

The key masterplan proposals for the Winklebury Hub were:

*“1) The establishment of a Community Hub on the Fort Hill school site comprising:*

- A new Community Facility for Winklebury including facilities for pre-school children, youth, sports and other local community initiatives.
- A Health and Wellbeing Centre.
- Public Open Space.

*2) A Hub which is bookended by enhanced shopping parades:*

- In the south as part of a redeveloped Winklebury Centre/Play Council site which will provide new urban open space and improved parking; and
- In the north at an improved Elmwood Parade.

*3) Improved pedestrian and cycle links connecting all parts of the Hub to each other, and improving links from Fort Hill to other parts of Winklebury and to Manydown.*

*4) New housing on:*

- Part of the Fort Hill site previously occupied by school buildings.
- On a redeveloped Winklebury Centre along with new shops.
- On the undeveloped remnant of the County Council Newman Bassett site.
- Potentially on a number of sites in Winklebury which may be freed up in future, such as Sycamore Hall, due to the improvements to the Hub”. (page 3 of the Winklebury Hub Masterplan 2019).

The CCG included the health and wellbeing centre in its North Hampshire Health and Care Transformation Plan 2018-2023 “an ambitious community project to develop ...one stop shop collocated services at Winklebury and Manydown as a health and wellbeing centre”. “These services would support how we deliver against the JSNA (Joint Strategic Needs Assessment – health needs of the local population) requirements, with its emphasis on starting well, living well and ageing well, to support the prevention agenda”.

BDBC prepared a business case to determine the best way to deliver the Masterplan, which puts forward a clear recommendation for BDBC to acquire the Fort Hill site for regeneration. That business case concluded that there should be a recommendation of the project at BDBC’s Cabinet meeting in November 2018 to secure political and financial commitment for the project with the authority to spend a very significant amount of money [the sum is stated in the draft business case, but not included in this report for reasons of confidentiality in 2019/20].

It is clear that the funds for the project were available, because the Cabinet Member for Portfolio and Property reported that *“During 2019 Property Services have been actively seeking to purchase further investments with the final £5.07M Property Investment Strategy funds. During the past 3 months the supply of suitable property investments has been limited with the majority being located out of borough”* (The Property Investment Strategy Half Year Report for Quarter 2 – 2019, submitted to the Cabinet Meeting on 17th December 2019).

## **The rejection of the proposals reviewed in the Winklebury Hub Masterplan 2019 and included in the CCG North Hampshire Health and Care Transformation Plan 2018-2023**

The Winklebury Hub Masterplan 2019 was not published. The WMCAG did not see a copy of the Masterplan, even though they were heavily involved in its development.

The councillors and residents have been informed that there are no minutes of the meetings nor records of the decisions that led to the rejection of the proposals that BDBC, key stakeholders and the residents of Winklebury had developed and were reviewed in the Winklebury Hub Masterplan 2019.

It is understood that, in December 2019, BDBC told HCC that there was no need for a new community hall in Winklebury, even though the BDBC's Winklebury Hub Masterplan 2019 described the current position of community facilities in Winklebury as follows:

"1) Community facilities in Winklebury are being lost and the remaining ones are in an increasingly poor condition.

2) In particular replacement facilities are needed for: the BDBC Sycamore Hall, BDBC Youth Centre on Winklebury Way; and the Pre-School facility at Fort Hill".

It was decided that a health and wellbeing centre on Fort Hill was not financially viable if there was no need for a new community hall. HCC agreed to sell the Fort Hill and Newman Bassett sites to Vivid. It is understood that the sale price was favourable to Vivid, because HCC was not seeking to make a profit on the sale; just to fund the demolition of the Fort Hill School and Community Centre buildings and the provision of a replacement pre-school facility.

The North Hampshire Health and Care Transformation Plan 2018-2023 has not been altered to reflect the significant change from a health and wellbeing hub one-stop shop to a small branch surgery. It is, therefore, not clear how the integrated health and social care services lost in the transition from health and wellbeing hub to small branch surgery could be provided and, therefore, how the health needs identified in the JSNA could be met.

### **Proposals for the Winklebury Regeneration developed in 2020**

In 2020, Vivid, BDBC and the CCG prepared plans for the future of the Winklebury Hub as part of a wider regeneration programme for Winklebury. These plans were "unashamedly housing led" (Mike Shepherd, 14th June 2022), rather than driven by the needs of the community of Winklebury.

These proposals were prepared without involvement with the affected local communities. Local residents, the Winklebury and Manydown Community Action Group, BDBC councillors and HCC councillors have repeatedly stated that the proposals do not positively support and complement the comprehensive wider development of the area. Their views have been ignored.

Between 2020 and 2022, the Councillors and residents carried out extensive research into the community facilities and activities that would meet the needs of local community. They talked to local residents, local agencies, local NHS service providers, local religious organisations, managers of successful community and sports facilities in the borough and other parts of the UK, national organisations responsible for providing support and advice on community facilities, other local

government organisations, NHS organisations responsible for providing health facilities in the borough and other parts of the UK, and potential funding partners. They developed proposals for community and health facilities in Winklebury, which were very similar to the proposals developed in 2018 and identified well-established local health, community and sports organisations that were willing to rent those facilities on a regular basis, and potential funding arrangements that were already working successfully in other parts of the borough. They presented those proposals to members of the Cabinet in 2021 and 2022, but the Cabinet refused to consider them.

Vivid says that it is committed to effective consultation, as set out in the NPPF. In the supporting Planning Statement, the contact with the local community is summarised in section 4. It included:

- 2018 community advised that the site was being considered for regeneration based on the Winklebury Community Action Group Community Plan
- 2020 a public consultation on a set of initial plans with the opportunity to provide feedback, comprising a single exhibition of 6.5 hrs
- 3 newsletters published in February 2021, July 2021 and January 2021 and a public webinar in March 2022

Vivid claims that the comments from residents have helped shape the current proposals, however, the Councillors and residents maintain that their significant concerns regarding the plans have repeatedly been ignored. The proposals have been housing-led with little attention given to the needs of the community and what they think is needed to meet its needs. The major change in the scheme has been the reduction in the height of the buildings at Fort Hill, a response to concerns about the impact on the SAM as a response to local concerns. The inclusion of a very small community facility was a last minute addition and did not involve consultation with the local community.

One of the clearest examples of the views of the residents and councillors being ignored is the failure to conduct the review of the community facilities in the Regeneration proposals that was requested by the residents of Winklebury (840 residents – 15% - signed a petition calling for the review) and passed as a motion by the Council on 24<sup>th</sup> March 2022:

“The Council requests that the appropriate Overview and Scrutiny Committee review and make recommendations to the Cabinet requesting:

- Additional work with Winklebury residents, the Winklebury and Manydown Community Action Group (WaMCAG), local stakeholders, HCC, HIOW ICS and the CCG to review the Winklebury Regeneration Project in the light of up to date data to ensure that this Project complies with central and local government policies; and
- The publication of any findings to ensure that the provision of community facilities in Winklebury not only meets today’s community needs, but future-proofs the Project”.

The Motion was passed by 28 votes to 12 at the meeting of the Full Council on 24<sup>th</sup> March 2022. Please see Appendix 2 for the published background to the Motion).

In response to the Motion, the Scrutiny Committee agreed to submit the following recommendations Cabinet:

- 1) “Invite Vivid, Hampshire County Council, the Cabinet Member for Homes and Regeneration, CCG, representation from the Winklebury Regeneration Action Group [the WRRP] and ward councillors to a meeting of the Scrutiny Committee to be held as soon as possible.
- 2) Request Cabinet to engage with Vivid to consider the views of the scrutiny committee following a meeting to be arranged” (Meeting of the Scrutiny Committee on 21<sup>st</sup> June 2022).

At the Cabinet meeting on 5<sup>th</sup> July 2022, the Cabinet Member for Homes and Regeneration stated that “following the motion at council and subsequent discussion by the Scrutiny committee he had engaged with partners who had reflected on the concerns raised and taken steps to review the proposals and amend the scheme to include community provision”. This was a clear rejection of the concerns raised that the provision of community facilities was inadequate and the request for them to be reviewed to ensure they were in line with central and local government policy by the residents in their petition, the Council in its motion and the recommendation of the Scrutiny Committee.

It is clear that the involvement of local communities in shaping their area and ensuring that they are well-served by services and facilities underpins the Council’s approach to considering development proposals. The current application falls well short of what the Local plan expects in terms of community involvement.

### 6.3.3 Masterplan

*The preparation of proposals will require full involvement and consultation with the affected local communities. A masterplan or development brief should be prepared demonstrating that proposals will positively support and complement the comprehensive wider development of the area (Policy SS2, para 2).*

Councillors, WMCAG and local residents were not involved in the preparation of proposals for the Regeneration that are contained in this planning application (please see Section 6.3.3). The Councillors, WMCAG and local residents do not believe that the proposals will positively support and complement the comprehensive wider development of the area.

### 6.4 Policy SS4 Ensuring a Supply of Deliverable Sites

#### **The WRRP considers the proposals to be contrary to Policy SS4**

The policy gives priority to the development of appropriate brownfield sites to support the supply of housing land. The contribution the proposed development would make to the five year-supply of housing is limited given the time it would take to deliver all of the component parts including the demolition and rebuilding of the Winklebury Centre. The WRRP questions whether use of the site of the former Fort Hill School and Community Centre for housing and its impact on the Scheduled Ancient Monument is an appropriate brownfield site and that other uses would be more sympathetic to it setting. The WRRP considers that other brownfield sites, such as Ashwood Park and Sycamore Halls, in Winklebury would be more suitable for housing.

## 6.5 Policy CN1 Meeting affordable housing

### **The WRRP considers the proposals to be contrary Policy CN1.**

*“The council will require 40% affordable housing on all market housing sites...The tenure split of affordable homes will be 70% rented and 30% intermediate products... 15% of affordable homes should meet enhanced accessibility or adaptability” (Policy CN1).*

The Planning Statement, ref section 8 advises that 40% of the 203 dwellings will be affordable. It does not confirm the number of affordable homes replacing existing homes that will be demolished and the number of new affordable homes as part of the new open market element of the scheme. The Council's Housing Strategy Manager, of the 4th August 2022, advises that 123 affordable homes in total will be required. It is not clear whether the plans will provide 123 affordable homes.

*“The provision of affordable housing to meet required needs is a key priority for the council in order to ensure that those households in need are able to access housing in the borough” (para 5.5).*

In addition to the number of affordable homes, the type of accommodation to be provided is important in terms of meeting the housing needs of the Borough. The Manager also advises that there is a significant unmet demand for 4 bedroom properties and 2 bedroom bungalows. The scheme only proposes five 2-bed bungalows and four 4-bed houses, so it fails to prioritise meeting the required housing needs. It is not clear whether the 4 bedroom properties and 2 bedroom bungalows will form part of the affordable housing element.

It is not clear whether 15% of affordable homes will meet enhanced accessibility or adaptability standards.

## 6.6 Policy CN3 Housing Mix for Market Housing

### **The WRRP considers the proposals to be contrary Policy CN3**

*Development will be permitted where the mix of market housing:*

- a) includes a range of house type and size to address local requirements; and*
- b) Is appropriate to the size, location and characteristics of the site; and*
- c) Is appropriate to the established character and density of the neighbourhood; and*
- d) Provides 15% accessible and adaptable homes to enable people to stay in their homes as their needs change (Policy CN3).*

The scheme only proposes five 2-bed bungalows and four 4-bed houses, so it fails to prioritise meeting the required housing needs. It is not clear whether the 4 bedroom properties and 2 bedroom bungalows will form part of the market housing element.

It is not clear from the supporting documentation submitted what the housing mix is for the market housing, and how many homes will be accessible and adaptable. Without that information it is not possible to conclude that the proposals are consistent with the policy. The issue of lack of information has been raised by the Policy Team in its consultation response.

‘The applicant should provide information to show the proposed housing mix for different tenures and to demonstrate how this compares to the existing (and the net changes resulting from the proposal). The market housing mix should take into

account the requirements of Policy CN3 and the Housing SPD (2018).’ Ref Policy response 2nd August 2022

## 6.7 Policy CN4 Housing for Older People/Specialist Housing

### **The WRRP considers the proposals to be contrary to Policy CN4**

*“Where there is evidence of an identified unmet need in the local area and the location is appropriate in terms of access to facilities, services and public transport, larger scale new residential developments should incorporate specially designed housing/specialist accommodation, to meet the needs of older people and people with support needs” (Policy CN4).*

There is a very significant unmet need for housing for older people and people with support needs in Winklebury. This need is increasing, because Winklebury has an ageing population, with 18% of current residents aged between 65 and 84. It is not clear from the supporting documentation submitted how the needs of older people and people with support needs is being addressed.

## 6.8 Policy CN6 Infrastructure

### **The WRRP considers the proposals to be contrary to Policy CN6**

*“New development will be required to provide and contribute towards the provision of additional services, facilities and infrastructure at a rate, scale and pace to meet the needs and requirements that are expected to arise from that development. Therefore, development proposals will be permitted where it can be clearly demonstrated that infrastructure can be provided and phased to support the requirements of proposed development” (Policy CN6).*

*“Developers will need to demonstrate that existing, planned and/or committed infrastructure is sufficient to accommodate new development proposals” (para 5.5, Local Plan).* The existing infrastructure in terms of community provision and health facilities do not meet the needs of the existing community. A number of community facilities have been lost in recent years (please see Table 1 in Section 3 of this submission), in particular those that were provided at Fort Hill School and Community Centre and the Play Council site. The Sycamore Hall is the only remaining community building of any size to support community activities, is not fit for purpose, is in a poor state of repair and would require substantial investment to meet BDBC’s zero carbon target. The Council’s Connected Communities and Community Housing and Infrastructure Team has advised, in its response to the application, that the nearest existing community provision is outside the recommended 15 minute catchment. The proposal for a new community facility of 178sqm is wholly inadequate to serve the existing residents and those of the new homes development.

The Local Plan quite rightly identifies the potential benefits of combining community provision *“Opportunities to share resources and premises between different services will be prioritised to ensure local service provision works for, and supports, local communities. This could include, for example, health-care provision linked to a community hall, or a school providing opportunities for community use or adult learning” (para 5.58, Local Plan).*

The current proposals fail to take advantage of the potential to combine the facilities it is proposing ie the medical centre, the pre-school nursery, community centre and accessible open space on a single site, even though there is an HCC-owned site in the heart of Winklebury that is available and large enough to accommodate all of

these facilities. This combination of facilities would provide the opportunity for a range of activities to share facilities to increase their benefit to the community and financial viability (One Public Estate and Strengthening Communities Strategy 2022), and complying with the principle of co-location Policy CN8). It could also provide the opportunity to accommodate a badly needed EV charging hub in Winklebury, which has a significant amount of on-street parking.

The policy requires it to be clearly demonstrated that the infrastructure can be provided. It is unclear that the proposed medical centre will be delivered, because a new healthcare provider will take over the current Fort Hill Surgery and, therefore, the proposed Medical Centre on 1<sup>st</sup> December 2022. This new provider has not been involved in planning the new medical centre and has, not yet had the opportunity to develop a strategy for providing health and wellbeing services in Winklebury and, therefore, is currently unable to determine the facilities it will need. If the proposed medical centre cannot accommodate the health and wellbeing services that the new provider wants to provide, it will not be delivered.

A review of the clinical strategy for North Hampshire, which includes Winklebury, casts doubt that the proposed medical centre will be delivered, because it is very different from the “one-stop co-located services at Winklebury and Manydown as a health and wellbeing Centre” in the North Hampshire Clinical Commissioning Group (CCG’s) Health and Care Transformation Plan (2018-2023).

In addition, the CCG’s most recent Estates Strategy was published in 2016 and, in March 2022, the CCG admitted in that its current knowledge of the estate was poor. A review of the estate is being conducted and a new Estate Strategy is being developed, but, until the review has been completed and the strategy published, there is no certainty that the medical centre will provide the right facility in the right location. There is, therefore, no certainty that the proposed medical centre will be delivered.

A review of NHS policy also suggests it is unlikely that the proposed medical centre will be delivered, because current NHS policy advocates large health facilities which provide a much wider range of health and wellbeing services than the proposed medical centre could accommodate. The plans for 9-room medical centre to serve the 15,000 residents of Winklebury and Manydown were approved by the North and Mid Hampshire CCG, which has now been disbanded. It is likely that the new organisation that has taken over from the CCG will re-examine the plans for the medical centre and will not approve funding, due to its inability to accommodate the greater range of health and wellbeing services required by NHS policy and the plans for the proposed new hospital.

*“The council will work with communities to deliver their aspirations through Neighbourhood Planning, and ensure that local services are retained and new facilities provided where there is local need”* (para 5.4, Local Plan). The community has not been involved in developing plans for proposed new infrastructure facilities (please see Section 6.3.2 of this submission).

*“Development proposals need to identify clearly how they will accommodate growth, and the provision of the necessary infrastructure in the creation or enhancement of sustainable communities”* (para 5.47). The proposed health facility cannot accommodate growth, because it is squeezed into a small site, with no opportunity for extension at ground floor level, has two storeys of flats above it and inadequate parking. The proposed community facility cannot accommodate growth, because it is



squeezed into the ground floor of a block of flats in the Winklebury Centre and has no parking.

## 6.9 Policy CN7 Essential Facilities and Services

### **The WRRP considers the proposals to be contrary to Policy CN7**

*“Development proposals will be permitted where they provide or improve essential facilities and services, and sustain and enhance the vitality and viability of communities. ...Development proposals which would be detrimental to or result in the loss of essential facilities and services that meet community needs and support well-being will only be permitted where it can be clearly demonstrated that:*

- a) The service or facility is no longer needed; or*
- b) It is demonstrated that it is no longer practical, desirable or viable to retain them; or*
- c) The proposals will provide sufficient community benefit to outweigh the loss of the existing facility or service, meeting evidence of a local need.*

*The council will work positively with local communities and support proposals to retain, improve or re-use essential facilities and services, including those set out in Neighbourhood Plans or Orders including Community Right to Build Orders, along with appropriate supporting development which may make such provision economically viable” (Policy CN7).*

The proposals would result in the permanent “loss of essential facilities and services that meet community needs and support well-being”, including the Play Council site, the Fort Hill School and Community Centre site and the area of open space at Carisbrooke Close. The proposals state that the retail floorspace will be increased from 618sqm to 652 sqm, but it is not clear how the existing floorspace is calculated, including whether it includes unoccupied units, those units occupied by the dental surgery, etc (see Section 2 of this submission). It is not clear whether accommodation will be provided for the dental practice as part of the regeneration and, if so, whether this will be part of the floorspace defined in the proposals as retail space. No evidence is included in the submission to demonstrate that the services and facilities are no longer needed; nor that it is no longer practical, desirable or viable to retain them.

The proposals will not provide sufficient community benefit to outweigh the loss of the existing facilities and services, meeting evidence of a local need, because:

- Any loss of retail floorspace will make it more difficult for residents to meet their day-to-day needs locally. It will also reduce the ability of local shops to be economically viable, due to reduced footfall around their shops.
- A 178sqm community facility on the ground floor of a block of flats does not provide sufficient community benefit to outweigh the loss of the Play Council site (280sqm) and the facilities provided to the community in the Fort Hill School and Community Centre.
- The open space on Fort Hill does not can be considered to outweigh the loss of the open space on Carisbrooke Close, because the open space on Fort Hill was already available to the community as part of Fort Hill School and Community Centre and was used for a variety of community activities, including sport, fayres, walks.

The council has not worked “positively with communities, including local voluntary organisations, and support proposals to develop, retain, improve or re-use community, leisure or cultural facilities”. Over the last few years, local organisations, residents and councillors have approached the council with proposals to retain, improve and reuse the facilities, but the proposals have either received scant or no consideration.

## **6.10 Policy CN8 Community Leisure and Cultural Facilities**

### **The WRRP considers the proposals to be contrary to Policy CN8**

*“Development proposals will be permitted where they:*

- a) Retain and maintain existing facilities which are valued by the community;*
- b) Improve the quality and capacity of facilities valued by the community;*
- c) Provide new facilities, in accordance with adopted council standards, where there is evidence of need that cannot be met by existing provision; and*
- d) Are delivered to prescribed timescales to meet the needs of the community that are being provided for.*

*Where opportunities exist, the council will support the co-location of community, leisure and culture facilities and other local services.*

*Proposals that would result in the loss of valued facilities currently or last used for the provision of community, leisure and cultural activities will only be permitted if it is demonstrated that:*

- e) The facility is no longer needed for any of the functions that it can perform; or*
- f) It is demonstrated that it is no longer practical, desirable or viable to retain them; or*
- g) Any proposed replacement or improved facilities will be equivalent or better in terms of quality, quantity and accessibility and there will be no overall reduction in the level of facilities in the area in which the existing development is located; or*
- h) The proposal will clearly provide sufficient community benefit to outweigh the loss of the existing facility, meeting evidence of a local need.*

*Any development proposals that would result in the loss of community, leisure and cultural facilities must be accompanied by an assessment which clearly shows the facility or land to be surplus to requirements. As a minimum the assessment must evaluate the quantity and quality of existing facilities in the locality and assess the need and value to the community. The views of the local community on any loss must be sought as part of this assessment.*

*The council will work positively with communities, including local voluntary organisations, and support proposals to develop, retain, improve or re-use community, leisure or cultural facilities, including those set out in Neighbourhood Plans/Orders including Community Right to Build Orders, along with the appropriate supporting development which may make such provision economically viable” (Policy CN8).*

## Existing and new facilities

- a) The proposals fail to maintain the existing facilities which are valued by the community, because they involve demolishing the Play Council building and building houses on the open space at Carisbrooke Close.
- b) The proposals result in a reduction in the quality and capacity of facilities valued by the community, due to the loss of community facilities and open space.
- c) The proposals fail to provide new facilities in accordance with adopted standards, including the Community Investment Framework (CIF) and Community Plan.

**Open space on Fort Hill.** The open space on Fort Hill will not be accessible, fit for purpose and adaptable to meet the varied needs of identified users. The consultation response from the Council's Parks and Open Spaces officer highlights the loss of accessibility to open space arising from the proposals, *"There are issues with distance thresholds as towards the southern end of the site, residents will need to travel further to open space than the standards allow for"*. No parking has been allocated for users of the open space, so it will be inaccessible to older and disabled people who do not live in the immediate vicinity of that space. There will also be no toilet facilities, which further excludes a large number of residents from using the space.

The Council's Parks and Open Spaces Officer also raises a concern in respect of the loss of the equipped play area at Carisbrooke Close and that it would not be replaced within the new smaller area as part of the housing scheme. *"The development will result in the loss of existing equipped play provision at Carisbrooke Close (approx. 593m<sup>2</sup>) which will have an adverse impact on the level of play provision and will need to be compensated. The proposal indicates a new play area to address this of 800m<sup>2</sup>, which addresses the quantum issue.*

*"As the play area will accommodate the wider community, replacing the lost site, as well as the new residents, a new equipped play site to meet the NEAP specification should be provided. However, it is understood that a large LEAP has been discussed and agreed as part of the pre-application details"*. A Neighbourhood Equipped Area for Play (NEAP) comprises a minimum area of 1,000 square metres, with at least eight activities. A Local Equipped Area for Play (LEAP) comprises a minimum area of 400 square metres, with at least five activities.

**Proposed community facility.** The proposed site for the new community facility does not accord with the CIF's principles for facilities and green spaces. Objective 2.1 of the CIF states that all facilities and green spaces to be, as a minimum, accessible, fit for purpose and adaptable to meet the varied needs of identified users. The proposed community centre is not accessible for people without a car, because there is no parking allocated for it. The size of the proposed community facility is not in accordance with BDBC's community buildings strategy version 2, which states that *"The larger centres (>500sqm) generally have more scope to accommodate different activities and therefore are better able to meet a wider range of community needs and be financially sustainable"* (Community Buildings Strategy v2 2017, p10).

BDBC's conclusions regarding the suitability of Harlech Hall in Winklebury as a community facility also demonstrate that the proposed community facility fails to meet the Council's adopted standards. Harlech Hall, which was about 200 yards from the proposed new community facility, was very similar to the proposed community facility because it was of a similar size and was located in an established residential area.

In October 2017, the Cabinet decided to demolish Harlech Hall and give the site to Vivid at nil value so that it could build seven houses on it. The rationale for the decision was that BDBC's Community Development Team "confirmed that the site is not in an ideal location, of the wrong size and is not considered a best fit with regard to any future community strategy. Its situation within an established residential area would require that any proposed community use (whether council led or run as a private concern) would need to address the impact on the residential amenity of nearby properties, such as hours of use, car parking, noise and privacy...The site is relatively small and would offer little scope for the enlargement of any future facility. A more suitable site may emerge as part of any wider and on-going regeneration and community investment framework considerations" (Implementation of an Affordable Housing Scheme:- Site of Harlech Hall, Harlech Close, Winklebury, Basingstoke, Meeting of the Cabinet on 10<sup>th</sup> October 2017).

**Proposed medical centre.** Section 5.78 of the Local Plan states that, in planning community, leisure and cultural facilities and services, which include healthcare facilities, "*a hierarchy approach will be adopted to ensure the right mix of local/neighbourhood, district and borough-wide provision across the borough*". The medical centre was not planned using a hierarchy approach, because the strategies required for that approach have not yet been completed.

The proposed medical centre has not been planned as part of a health services strategy for the neighbourhood, district and borough-wide provision of health services across the borough. The proposed medical centre is very different from the "one stop collocated services at Winklebury and Manydown as a health and wellbeing centre" that are contained the North Hampshire Health and Care Transformation Plan (2018-2023).

The proposed medical centre has not been planned as part of a primary care estates strategy. The most recent estates strategy relating to Winklebury was the North Hampshire CCG Local Estates Strategy 2017-2021. The HIOW ICS is currently developing a primary care estate strategy that will include Winklebury, but the process is a significant challenge, because "the current state of knowledge about the condition and suitability of our primary care estate is inconsistent and to a large degree out of date (some buildings have not had 6 facet surveys carried out for ten years or more) (Primary Care Estates Update to the HIOW Primary Care Commissioning Committee, March 2022). It should also be noted that NHS best practice guidance on the design and planning of new healthcare buildings also state that "a well thought-out estate strategy is essential to the provision of safe, secure, high-quality healthcare buildings capable of supporting current and future service needs" (NHS Health Building Note HBN 00-01).

The estates model that the now disbanded CCG used to determine the facilities required in the medical centre was developed over 5 years ago, before COVID and the NHS Long Term Plan. The CCG has acknowledged that, since that model was developed, the NHS has undergone the greatest transformation in its history. The medical centre proposed for Winklebury will not, therefore, meet the current and future needs of the population that it serves. Other primary care facilities that are being planned, such as the new Chineham health centre, have used more recent models to plan the facilities that residents need, which reflect that transformation.

The Director of Strategic Finance at HIOW ICS stated in his Primary Care Estates Update to the HIOW Primary Care Commissioning Committee, March 2022 that "there are real current pressures relating to the estate and available space in primary care, with the lack of clinical space now having an impact on the recruitment and

retention of the additional Additional Roles Reimbursement Scheme (ARRS) roles currently being created”.

It is, therefore, surprising that the medical centre being proposed in 2022 is much smaller than that planned in the North Hampshire Health and Care Transformation Plan (2018-2023), which was drafted before the NHS Long Term Plan (2019), which introduced several new ARRS staff to every GP practice, transferred a large number of services from hospitals to the community and resulted in a significant increase in the pressure on the NHS estate.

### **Collocation**

The policy states that *‘where opportunities exist the council will support the co-location of community, leisure and culture facilities and other local services’*. There is an opportunity to co-locate of community, health, pre-school, leisure and culture facilities and other local services on Fort Hill, which is a vacant HCC-owned site and was identified by BDBC as an ideal location for a health and wellbeing hub in the Winklebury Hub Masterplan (January 2019). The proposals fail to take this opportunity.

### **Loss of valued facilities**

Of particular relevance to the current proposals is that Policy CN8 applies to *“facilities currently or last used for the provision of community, leisure and cultural activities* (Policy CN8, para 3). The Play Council, Fort Hill School and Community Centre and the open space at Carisbrooke Close are all in use or last used for community provision. The policy states that *“any development proposals that would result in the loss of community, leisure and cultural facilities must be accompanied by an assessment”*:

- *“which clearly shows the facility or land to be surplus to requirements”*. Such an assessment does not accompany these proposals.
- *“As a minimum the assessment must evaluate the quantity and quality of existing facilities in the locality and assess the need and value to the community”*. Winklebury is poorly served by existing community, leisure and cultural facilities. Over the past few years, Winklebury has lost several community facilities, including Fort Hill School and Community Centre, the Play Council, Basingstoke Day Services, Harlech Hall and Roman House.

The only remaining community centres are the Youth Project, which is a single room and Sycamore Halls. The recent condition survey of Sycamore Halls, which is the only community building of any size in Winklebury, demonstrates that it is in a poor state of repair and would require substantial investment to meet BDBC’s carbon neutral target. It is not, therefore, possible for make Sycamore Halls economically viable in the long term. If Sycamore Halls closed, the proposed 178sqm community facility on the ground floor of the Winklebury Centre would be the only community facility (apart from the small single room Youth Centre) in Winklebury. The community facilities proposed in this plan do not, therefore, meet the needs of the community.

The sports pavilion and multi-user pitch in Winklebury are run by HCC and not for community use. Winklebury has a 21ha deficit of open space.

The contrast between the community facility provision in Winklebury and other wards in the borough is striking. Most, if not all, other wards contain community facilities that include a variety of accommodation and collocation with open

space, in order to provide health and wellbeing activities for all ages, including those with disabilities, that range from large community fayres, parties and sports, to small groups, to 1-1 counselling sessions. In Winklebury, the Youth Project comprises a single, small room and Sycamore Halls comprises two large halls in a poor state of repair, no smaller rooms and no open space.

The Council has undertaken a Community Assets and Needs Assessment (CANA) and Leisure and Recreational Needs Assessment (LRNA) of Winklebury to inform the review of the Local Plan. Neither of these studies has been published or shared with WMCAG, even though they helped to carry out the CANA in March 2020. It would be premature to determine the application without taking account of them in considering if Policy CN8 has been met.

- “The views of the local community on any loss must be sought as part of this assessment”. The community has not been involved in an assessment. Local residents have stated time and again that they are extremely unhappy about the loss the facilities.

The council has not worked positively with the local community and voluntary organisations to retain, improve or reuse essential facilities and services. Local organisations, residents and councillors have approached the council with well-researched proposals to retain, improve and reuse the facilities that will be lost as part of this plan (22/01934/FUL), but the proposals have either received scant or no consideration.

## 6.11 Policy CN9 Transport

### **The WRRP considers the proposals to be contrary to Policy CN9**

The policy permits development proposals that *a) integrate into existing movement networks b) provide safe, suitable and convenient access to all potential users c) provide an on-site movement layout compatible for all potential users with appropriate parking and servicing provision and d) do not result in inappropriate traffic generation or compromise highway safety.*

Table 2 below presents the number of parking spaces proposed in the plans against the number of parking spaces in the BDBC Supplementary Planning Document (SPD) on Parking Standards. Most of the numbers correlate with the parking table presented in Table 7: Car Parking Requirement vs Provision, which is contained in the Transport Assessment for Fort Hill and Winklebury Centre Basingstoke (p20). The key differences are:

- the number of examination rooms in the medical centre (the assessment states 7, but the site plans show 9)
- the parking spaces for retail units in the Winklebury Centre. One of the retail units will be a food retailer. The Transport Assessment states that all retail units will be non-food, however it is expected that an existing food retailer will remain in the Winklebury Centre. In addition, the calculation of parking spaces for retail units (21.7 spaces) is much lower than the SPD requirements for 652sqm of retail space (32.6 if all non-food or 44.6 if 50% of retail space is for food).
- The Transport Assessment states that there are 36 spaces in the Medical Centre, but we could only see 28 spaces on the drawing.

- The plans stated that the proposal provides 369 parking spaces (although we could only find 361, because 8 appeared to be missing from the Medical Centre).
- The failure to make allowance for the Church of the Good Shepherd, Little Lambs
- The applicant states that the development requires 363 parking spaces by the current parking standards. We have calculated that the number of parking spaces required by the development in order to meet BDBC's parking standards is 414. It should be noted that the church, pre-school and the adjacent Castle Hill School use approximately 32 parking spaces in the Winklebury Centre. No allowance has been made for these spaces, so, under the plans, there would be no parking for people using those facilities.

Unit	Proposed spaces	BDBC Parking standard	Parking standard explanation. Winklebury is classed as Outer Urban, because it is outside Basingstoke Ring Road
<b>Fort Hill</b>			
28 x 2 bed units	60.00	49.00	1.75 spaces per 2 bed unit, with 20%-50% unallocated spaces
38 x 3 bed units	72.00	66.50	1.75 spaces per 3 bed unit, with 20%-50% unallocated spaces
Nursery school	20.00	3.25	1.5 spaces per 3 staff, assuming 6.5 FTE staff
<b>Total</b>	<b>152.00</b>	<b>118.75</b>	
<b>Newman Bassett</b>			
5 x 2 bed units	12.00	8.75	1.75 spaces per 2 bed unit, with 50+% unallocated spaces
<b>Total</b>	<b>12.00</b>	<b>8.75</b>	
<b>Carisbrooke Close</b>			
3 x 2 bed units	7.00	4.50	1.5 spaces per 2 bed unit, with 50+% unallocated spaces
4 x 3 bed units	9.00	6.00	1.5 spaces per 3 bed unit, with 50+% unallocated spaces
4 x 4 bed units	10.00	10.00	2.5 spaces per 4 bed unit, with 50+% unallocated spaces
<b>Total</b>	<b>26.00</b>	<b>20.50</b>	
<b>Medical Centre</b>			
4 x 1 bed units	4.00	4.00	1 space per 1 bed unit, with 50+% unallocated spaces
6 x 2 bed units	9.00	9.00	1.5 spaces per 2 bed unit, with 50+% unallocated spaces
Surgery: 9 consulting rooms	14.00	45.00	5 spaces per consulting room
Pharmacy (135sqm)	1.00	6.75	1 space per 20sqm
<b>Total</b>	<b>28.00</b>	<b>64.75</b>	<b>Transport Assessment says 36 spaces. Only 28 on drawing.</b>
<b>Winklebury Centre</b>			
56 x 1 bed units		56.00	1 space per 1 bed unit, with 50+% unallocated spaces
51 x 2 bed units		76.50	1.5 spaces per 2 bed unit, with 50+% unallocated spaces
4 x 3 bed unit		6.00	1.5 spaces per 3 bed unit, with 50+% unallocated spaces
Food retail (assume 326sqm)		23.29	1 space per 14sqm
Non-food retail (assume 326sqm)		21.30	1 space per 20sqm
Community facility		17.80	1 space per 10sqm
<b>Total</b>	<b>143.00</b>	<b>200.89</b>	
<b>Total for all development sites</b>	<b>361.00</b>	<b>413.64</b>	
<b>Winklebury Centre: spaces used by existing facilities. Allowances must be made for these spaces</b>			
Church (195sqm)	0.00	20.00	1 space per 10 sqm open hall.
Castle Hill School	0.00	10.00	At least 10 spaces in the Play Council and Winklebury Centre sites are used by parents to drop-off and collect children every day
Little Lambs pre-school	0.00	2.00	1.5 spaces per 3 staff.
<b>Total requirements of existing facilities</b>	<b>0.00</b>	<b>32.00</b>	<b>Under the plans, no spaces have been set aside for these facilities, so they will have no parking provision.</b>
<b>Total number of parking spaces required for the scheme, inc allowance for spaces used by existing facilities</b>	<b>361.00</b>	<b>445.64</b>	

**Table 2: Summary of proposed versus required parking provision (based on the site plans)**



### 6.11.1 Fort Hill

115.5 spaces are required when applying the adopted parking standards. The scheme proposes 104 allocated spaces and 28 unallocated spaces. The number of allocated spaces is lower than that required by the SPD on Parking Standards which would mean that some properties would have to compete with residents and visitors for parking spaces. No specific justification is given for this approach.

### 6.11.2 Nursery/pre-school

The requirement is for 3.25 spaces, 20 are provided. No justification is given for the over-provision.

### 6.11.3 Newman Bassett Site

The requirement for the 11 dwellings is 8.75 spaces, 12 are proposed of which only four are allocated spaces. No justification is given for the over-provision or why spaces are unallocated on a site which is below the threshold of twenty set out in footnote seven of Table 1 of the SPD on Parking Standards.

### 6.11.4 Carisbrooke Close Public Open Space

The requirement is for 20.5 spaces, 26 are proposed. Only 4 spaces are within the curtilage of homes with the remainder not specifically allocated to individual dwellings. No justification is given for the over-provision or for provision not being allocated to each dwelling.

### 6.11.5 Medical Centre

5.15 "Medical Centre. The medical centre comprises the development of a GP surgery (housing 7 consultants)". The floor plans of the medical centre show that it comprises 9 examination rooms, so the SPD states that it requires 45 parking spaces, in addition to the 6.75 spaces required for the pharmacy.

5.15 "The proposed car parking provision for the medical centre is 36 spaces", however, the submitted drawing for the site (Drawing 1160PD601.revB) lists 26 spaces (13 of which are for the flats).

5.17 "The demand for car parking for the pharmacy uses is likely to be created by patients visiting the GP surgery, therefore the additional demand for the 6.75 spaces beyond those required for the GP surgery will result in a double counting of spaces, as those pharmacy spaces will be associated with the GP surgery". The approach is considered to be flawed for a number of reasons. The users of the pharmacy may not be visiting the GP surgery, collecting prescriptions as part of a different journey eg collecting for a relative or neighbour. A person visiting the pharmacy after a GP appointment may well have vacated the consulting room but is still in the building waiting for a prescription. Visits to the GP are stressful enough for patients who would not want to be anxious about where to park and whether they would be late for an appointment. The Medical Centre is intended to serve Winklebury and Manydown and it is a reasonable assumption to make that residents from the latter are highly likely to travel by car and require parking. It should also be recognised that many residents attending the Medical Centre and pharmacy will have reduced mobility due to age, disability or illness, so will need easily accessible parking spaces. A further issue is the importance of parking for peripatetic staff, such as GPs and community nurses.

In the Transport Assessment it is proposed that the parking for residents living above the Medical Centre could be accommodated at the Winklebury Centre which is some distance away. The proposal to rely on unallocated parking at the Winklebury Centre for the 10 residential units is below the threshold of 11 for relying upon unallocated spaces set out in the Parking SPD. The exception to the SPD has not been justified.

#### 6.11.6 Winklebury Centre

Vivid has attempted to justify its failure to comply with BDBC's SPD on Parking Standards. The points (in quotation marks) that they make in the Transport Assessment (Report No 146.0002/TA/6) will each be addressed in turn:

"5.11 Winklebury Centre: The car parking standards stipulate a requirement of 22 spaces for retail units". The plans state that the retail units will be 652sqm, so there should be 32.6 spaces if the units are used for non-food retail. It is expected that a large percentage of the retail space will be used by a food retailer, which currently occupies a large retail unit in the Centre, so, if we assume that 50% of the units will be used for food retail and 50% for non-food retail, there should be 44.6 parking spaces for the retail units.

"No separate parking is identified for the small community use building as this is ultimately set in the heart of the community which it serves". The SPD clearly states that all community facilities should have 1 parking space per 10sqm of the facility. Vivid should, therefore, provide 17.8 parking spaces for the 178sqm community facility. It should be noted that many of the users of community facilities are older or disabled, so it is very important that adequate parking is provided.

5.12 "The highly accessible location of the residential dwellings, located above/within a local centre with good pedestrian, cycle and public transport links to other local facilities, will reduce the likely car parking demand of the dwellings". Given the aging population and almost complete absence of employment opportunities, community facilities, sports facilities, shops, food outlets, etc in Winklebury, it is unrealistic to expect that residents will not need cars. None of the spaces are allocated. Residents in the Winklebury Centre will, therefore, often find it difficult to park near their homes, especially because there will be no parking spaces allocated to residents. A further problem is the allocation of EV charging points to resident and non-resident spaces.

5.13 "The retail uses will typically result in car parking demand during the day, whereas typical residential car parking demand peaks within the evening and overnight when residents return home from work". This simplistic approach fails to reflect the change to more flexible patterns including more people working from home. According to the 2011 census, the top 3 occupations in Winklebury are elementary administration and service, administrative and sales. These are exactly the occupations that are increasingly being undertaken from home. In addition, 61 of the homes in the Winklebury Centre and Medical Centre will have 2 or more bedrooms, so it is very likely that many of these homes will be occupied by families with school-aged children, who will return home by 4pm.

"These shops are typically used by local residents". The Design and Access Statement sees one of the merits of the proposed scheme as being to create new focus for trips. The key aspiration is to reinvigorate the retail element of the Winklebury Centre, not only by providing new, main road facing, visible units that are obvious and accessible to passing trade, but also by adding new dedicated medical facilities, pharmacy and community space that will also prove a draw to the area. (para 2.46).

However, the proposed parking strategy would seriously undermine that aspiration. The applicant appears to be relying upon an over-provision at the Fort Hill site to compensate for the significant under provision at the Winklebury Centre and Medical Centre. It is considered wholly unrealistic to assume that visitors to the Winklebury Centre or Medical Centre would enter the Fort Hill site looking for a parking space. They are also relying on a number of assumptions about the patterns of parking which are not supported by any detailed evidence. It is very likely given the under provision that there will be limited parking available to support the businesses in the Centre undermining their viability.

5.14 "Therefore, it is considered that although the car parking provision falls short of the standards, the proposed car parking strategy for the Winklebury Centre provides a betterment than that of the existing situation". The Transport Assessment also justifies the under-provision on the basis that the proposed scheme would result in more useable spaces than currently exist. However, there is no analysis of the existing situation to demonstrate that the proposals would indeed result in a positive improvement.

It should also be noted that the current demand for parking spaces at the Winklebury Centre is completely incomparable to that post-regeneration. All but six of the flats in the Winklebury Centre are currently occupied as Assured Shorthold Tenancies (AST), due to the uncertainty regarding the future of the flats. Residents in AST accommodation are far less likely to have cars than residents with other types of tenancies or who own their home. In addition, much of the retail space in the Winklebury Centre is currently unoccupied. The demand for parking spaces resulting from the regeneration will be very significantly higher than it is now.

The proposed under-provision of parking at the Winklebury Centre and the pressure on those spaces provided also need to be considered in the context of the parking needs of the Church (20 according to the BDBC SPD on Parking Standards) and Little Lambs Pre-School (2 spaces). The church and pre-school parking is currently in the Winklebury Centre, but, under the proposals in this application, all of the spaces that they currently use would be used by the flats and retail units in the plans and the church and pre-school would be left without a single parking space.

The Transport Assessment also fails to mention the significant impact that the plans would have on the parking associated with Castle Hill Infant and Primary Schools, which are adjacent to the Winklebury Centre, at pick-up and drop-off times during the day. Parents and carers of children at the schools currently park in the Winklebury Centre and Play Council car parks at school drop-off and collection times. The implications of the displacement of cars using the site are not addressed.

The approved outline plan for the Manydown Development (17/00818/OUT) includes significant changes to Winklebury Way in order to make it a main thoroughfare between Manydown (3,520 houses) and the town centre and railway station. These changes include establishing a two-way cycle route along the stretch of Winklebury Way that passes Castle Hill School and the Winklebury Centre. This stretch of Winklebury Way is currently used for parking at school collection and drop-off. Winklebury Way will, therefore, become much busier and, therefore, more dangerous for pedestrians. There does not appear to have been any mitigation for the increased traffic and, therefore, increased danger to pedestrians, especially older or disabled people crossing the road to reach the Medical Centre or Winklebury Centre.

It would be reasonable to assume that parents and carers will look to use spaces within the new Medical Centre car park and the Winklebury Centre, which are already

under provided for in terms of the parking standards. It is likely that they would, therefore, have to park in less safe locations, much further from the schools. Local residents are already very concerned about the level of school parking in their roads, which often makes it impossible for them to park near their homes at school drop-off and collection time every single day. It is unrealistic to expect all parents and carers to walk to the schools, because many of them need to drop off and collect their children on the way to and from their place of work. It should be noted that the Headteachers of Castle Hill Primary School and Castle Hill Infant School have both written to BDBC to express significant concern regarding this issue.

The approach also fails to recognise the parking pressures on surrounding streets. It is likely that pressure will build on adjoining residential street, because there is already insufficient parking for residents in streets adjacent to the Winklebury Centre, such as Warwick Road. Several residents of Warwick Road have said that they struggle to find adequate parking space in Warwick Road and that they would park in the Winklebury Centre if it were better lit at night.

### 6.11.7 Conclusion

In conclusion, the parking strategy for the new development is fundamentally flawed, with an over-reliance on assumptions about patterns of parking demand that are not representative of the experience of local residents. The lack of provision at the proposed Winklebury Centre, combined with the pressure generated by insufficient parking at the proposed Medical Centre, and the loss of the drop-off and pick-up parking for the school, demonstrates a poor understanding of the existing needs of the community and the demands generated not only by the proposals but the impact of the users of the proposed facilities from a wider area in particular Manydown. The proposed parking is, therefore, considered inappropriate for the development proposals, will not be sufficient to accommodate demand and will result in significant overspill onto neighbouring streets.

### 6.12 Policy EM1 Landscape

#### **The WRRP considers the proposals to be contrary to Policy EM1**

The policy states that “*development will be permitted only where it can be demonstrated, through an appropriate assessment, that the proposals are sympathetic to the character and visual quality of the area concerned. Development proposals must respect, enhance and not be detrimental to the character or visual amenity of the landscape likely to be affected*” with particular attention to be given to a number of features including trees and historic landscapes.

The applicant’s arboricultural consultants have advised that 110 trees would need to be removed as a result of the proposed development. This represents a significant number of all of the trees present within the application site. The retention of the remaining trees will be reliant upon a robust application of the tree protection measures recommended by the consultants and adherence to any approved plans. It is by no means certain that further trees would not be lost in the construction work.

The presence of trees is an important element of the character of the part of Winklebury where development is proposed, providing not only a green backdrop and relief to the urban area, but also a green canopy which provides shade which is of particular importance in time of extreme heat. The NPPF (para 131) highlights the importance of trees in urban environments. It is considered that the loss of existing trees would have significant detrimental impact on the character of the area.

### 6.13 Policy EM4 Biodiversity, Geodiversity, Nature Conservation

#### **The WRRP considers the proposals to be contrary to Policy EM4**

The submitted information does not appear to have fully recorded the ecological value of the site and the proposed development may not meet the relevant guidance set out in the Council's Landscape, Biodiversity and Trees SPD. In the absence of the necessary detail the application is considered to be in conflict with the policy.

### 6.14 Policy EM5 Green Infrastructure

#### **The WRRP considers the proposals to be contrary to Policy EM5**

The policy sets out the criteria for considering proposals which affect existing public and private open space. *“Proposals for the redevelopment of public and private open spaces will not be permitted unless it can be clearly demonstrated that: d) Replacement areas will be at least equivalent in terms of quality, quantity and accessibility, and there will be no overall negative impact on the provision of green infrastructure; or e) A robust assessment clearly demonstrates that the space is surplus to local requirements and will not be needed in the long term in accordance with the council's local standards; or f) The proposal is for alternative recreational provision which meets evidence of local need in such a way as to outweigh the loss”* (Policy EM5).

The scheme will result in the loss of the existing open space at Carisbrooke Close. It is highly accessible to residents and is located at the centre of the application, as acknowledged by the applicant's landscape consultants in section one of their supporting statement. The site is well used by residents and is a popular destination for children on their way home from school. The location of the new play area on the Fort Hill site cannot be considered to be equivalent in terms of accessibility to existing users. The proposed area of 0.1ha proposed as part of the new housing scheme does not compensate for the loss. The open space on Fort Hill cannot replace the open space lost on Carisbrooke Close, because the space on Fort Hill was used by the community when Fort Hill was a school and community centre.

The consultation response from the Council's Park's and Open Spaces officer highlights the loss of accessibility to open space arising from the proposals. It appears that the applicant was previously advised that their approach was acceptable (see extract below). It would be helpful to understand the reasoning for that advice.

*‘There are issues with distance thresholds as towards the southern end of the site, residents will need to travel further to open space than the standards allow for. However, it is understood that this has been agreed with officers previously as part of the pre-application enquiry.’*

The officer also raised a concern in respect of the loss of the equipped play area at Carisbrooke Close and that it would not be replaced within the new smaller area as part of the housing scheme.

*“The development will result in the loss of existing equipped play provision at Carisbrooke Close (approx. 593m<sup>2</sup>) which will have an adverse impact on the level of play provision and will need to be compensated. The proposal indicates a new play area to address this of 800m<sup>2</sup>, which addresses the quantum issue.*

*As the play area will accommodate the wider community, replacing the lost site, as well as the new residents, a new equipped play site to meet the NEAP specification should be provided. However, it is understood that a large LEAP has been discussed and agreed as part of the pre-application details".* A Neighbourhood Equipped Area for Play (NEAP) comprises a minimum area of 1,000 square metres, with at least eight activities. A Local Equipped Area for Play (LEAP) comprises a minimum area of 400 square metres, with at least five activities.

Again, it would appear that the applicants have been advised that their approach, whilst not in accord with the relevant policy, was acceptable at the pre-application stage. The justification for the approach set out in the pre-application advice should be explained.

The loss is more significant as the ward has a serious existing deficit of open space, comprising a shortfall of 21ha of multifunctional green space (Green Infrastructure Strategy 2018-2023), The proposed open space at the Fort Hill site does not add new open space, because the site was previously accessible to the community as part of the access afforded to it by Fort Hill School and Community Centre. Activities included children's sports camps, exercise classes for older people as well as playing field for the school.

The school and community centre site enabled a range of community activities to take place, as it provided supporting facilities such as parking and access to toilets which are important, particularly for older people, disabled people and young children. The application does not make any similar provision.

#### **6.15 Policy EM7 Managing Flood Risk**

##### **The WRRP considers the proposals to be contrary to Policy EM7**

The WRRP is concerned that the proposed development could potentially result in local surface water flooding. Hampshire County Council has responded to the application as local lead Flood Authority 9th August 2022 and advised that further information is required in order for it to provide an informed response regarding the management of surface water. A decision on the proposals should not be made until such times as LLFA is satisfied that the surface water issue can be addressed.

#### **6.16 Policy EM10 High Quality Development**

##### **The WRRP considers the proposals to be contrary to Policy EM10**

The policy sets out a number of criteria which need to be addressed in respect of the design of development. Of particular relevance are; *1c) positively contribute to the appearance and use of streets and other public spaces, 1d) promote the efficient use of land and achieve appropriate housing densities, 2a) take into account all relevant SPDs and community documents that identify the local character and distinctiveness of an area which is valued by local communities, 2b) provide a high quality of amenity for occupants of the development and neighbouring properties having regard to a number of issues, 2c) due regard for the relationship to neighbouring buildings, 2e) provide appropriate parking provision in terms of amount design layout and location*

The WRRP has a number of concerns regarding the proposed layout of the development. The scheme proposes the loss of a valued public open space, which is an important local feature. The height and scale of the proposed Winklebury Centre will have a significant impact on the residents of the properties adjoining the site. The impact of the new buildings in terms of sunlight and daylight do not appear to have

been assessed. The parking provision for the medical centre and the Winklebury Centre as set out in this response is considered to be woefully inadequate

In its advice on the proposed layout in respect of the prevention of crime and disorder, Hampshire Constabulary advised that it cannot support this application in its current form, because of the relationship between public areas and the elevations of private buildings and poor means of security to the rear of homes (8<sup>th</sup> August 2022).

## **6.17 Policy EM11 Heritage**

### **The WRRP considers the proposals to be contrary to Policy EM11**

#### **6.17.1 Fort Hill site**

The ramparts of the Winklebury Hill Fort are designated as a Scheduled Ancient Monument (SAM) and are to be treated as a designated heritage asset.

The policy requires of all development that it must conserve or enhance the quality of the borough's heritage assets in a manner appropriate to their significance. Proposals need to be supported by a thorough understanding of the significance of the asset and how the development would impact on its significance. It is also important to demonstrate how the significance of the asset will be retained (Policy EM11, a, e). The NPPF 2021 provides guidance on the approach to assessing the impact on heritage assets with which Policy EM11 is consistent.

The issue to be addressed is the extent of the impact of the proposed development and in particular the degree of harm to the SAM. Any harm or loss to the significance of the asset or from development within its setting requires clear and convincing justification (NPPF para 200).

The NPPF sets out two levels of harm: substantial and less than substantial. Any assessment of a proposed development should set out what the level of harm arising is, in order to undertake the balancing of the harm with the public benefits that the development would deliver.

The application has been supported by a Heritage Desk Based Assessment, March 2022, which has concluded that "Overall, while the development would result in a change to the immediate surroundings and experience of the Scheduled Monument, the carefully considered scheme design has ensured that any resultant harm to the asset's significance would be limited and less than substantial (para 5.29). That harm needs to be weighed against the public benefits of the scheme and, only if it is concluded that they outweigh the harm, should permission be given.

The harm arises from the impact of the proposed residential development within the setting of the SAM and the increased public access to the ramparts. The submitted Assessment, in analysing the scale of impact, has compared the impact of the now demolished school buildings and the proposed housing, pre-school building and play area (para 5.22). This is a flawed approach and the assessment should be based on a comparison between the current position and what is proposed. It is also not clear how the proposed development has responded to its location within the setting of the SAM (para 5.22).

The SAM is protected by the existing security fence, which restricts access to much of the ramparts. The proposed development would open up the site and with it allow the public access, the impact of which has been recognised by the Assessment. Access into the hill fort interior would utilise existing paths and roads, and no

breaches of the Scheduled ramparts are proposed. In the long-term, continued use of the footpaths may lead to further erosion of the ramparts and disturbance of any underlying archaeological deposits (para 4.54).

‘The physical elements of the Scheduled Monument may experience a benefit resulting from the proposals to designate official pedestrian access into the interior utilising the existing paths. It was noted during the site visit that several unofficial footpaths had been created along and across the Scheduled Monument, particularly evident along the southern section of ramparts. It is intended that better provision of formal access and public use of the hill fort interior will dissuade such activity, thus preventing further impact to archaeological deposits, and enable more careful management of the Scheduled Monument.’ Ref para 5.19

Historic England, in its formal response to the Council (10<sup>th</sup> August 2022), advises that the level of harm would be less than substantial and has also expressed concerns regarding the potential impact of increased public access and the limitations of the proposed Scheduled Monument Management Plan March 2022:

*‘We have significant concerns that these enhancements are not yet presented in a timed and deliverable format with key targets and measurable outcomes, and agreed by all parties.*

*We do not object to the principle of the proposals but have concerns regarding the delivery of key benefits to the monument, namely the ongoing management of the monument and community engagement strategy. The delivery of these key benefits is critical to ensuring that the resultant harm of the development is outweighed.*

*We have significant concerns that the plan presented is insufficient to address the management issues as they currently stand. There needs to be a robust Conservation Management Plan (CMP) which outlines active management for the ramparts. We advise that the details of this should be agreed in advance of the determination of any planning application.’*

It would appear that, until a comprehensive management plan has been agreed, it is not possible to conclude with certainty the level of harm that would arise from the development. It is also clear that any plan needs to involve the local community in its formulation as its successful implementation will rely on the community’s positive involvement.

### **6.17.2 Newman Bassett site**

The northern boundary of the proposed housing development runs along part of the SAM. The impact of the scheme on the SAM does not appear to have been considered in the submitted Assessment. This is considered to be a serious omission and that any decision on the application would be unsound if it is based on an incomplete assessment of the impact of the development on a designated heritage asset.

The submitted Assessment is considered to be incomplete in respect of the impact of the development on a designated heritage asset and the proposed Management Plan does not address the issue of increased public access to the SAM.



## 7 Implementation

The delivery of the proposed development would have a significant impact on the community in respect of the disruption to the existing businesses, demolition of the Winklebury Centre and its re-building, and the construction associated with the Medical centre and the three housing sites.

Vehicle access to the proposed housing sites would be via residential roads. It is likely that the primary access to the sites associated with this application would be from Roman Road, which is directly linked to the A339. It should be noted that Roman Road, which is a single carriageway residential road, will also be the only access route for construction traffic associated with the Manydown Development. It is expected that the construction of the Manydown Development, which comprises 3,520 homes, will take place at the same time as the construction associated with this application. The implications of construction traffic for both developments using Roman Road at the same time will be very significant and have not been assessed.

There are no details, other than a brief outline of the phasing of the development submitted as part of the planning application, of how the proposals would be delivered. There are no details regarding the location of site compounds, parking for contractors' vehicles, traffic management plans for the routing of heavy goods vehicles (HGVs), management plan for the demolition of the Winklebury Centre, disposal of the waste material or hours of operation.

The WRRP considers that how the proposed scheme would be implemented should be an integral part of the assessment of the application to inform the necessary conditions and agreements in the event that there was a recommendation for permission.

## 8 Conclusion

The proposed development by Vivid comprises a number of inter-linked sites at the centre of the local community. They provide an opportunity to make a positive contribution to the future well-being of that community. For the reasons set out in this submission that opportunity has not been fulfilled.

The WRRP considers the proposed development is in conflict with the NPPF and the objective of delivering sustainable development. It is also contrary to the promotion of healthy and safe communities ref Section 8 and paragraphs 92-96 of the NPPF. Furthermore, it is contrary to the following Basingstoke Local Plan 2016 policies:

**Policy SD1: Sustainable Development**, because the proposals fail to meet the current needs of the community and compromise the ability of future generations to meet their needs, by building houses on the only land in Winklebury (Fort Hill) that is large enough to accommodate community facilities collocated with open space, which provide the facilities that local residents need.

**Policy SS1a): Scale and Distribution of New Housing**, because they provide very limited contribution to the supply of housing, provide minimal social benefit, and are detrimental to economic wellbeing, due to loss of retail space, and environmental wellbeing, due to loss of open space and at least 110 trees.

**Policy SS2: Regeneration**, because the proposals were not prepared with the involvement of the local community and, consequently, fail to meet their current and future needs. They also prevent the construction of facilities that will meet the needs of local residents in the future, because the plans involve the construction of houses on the only site in Winklebury that can accommodate community facilities collocated with open space.

**Policy SS4: Ensure supply of deliverable sites**, because the site of the former Fort Hill School and Community Centre is not appropriate for housing because it is the only site in Winklebury that could accommodate collocated community facilities and open space. Other brownfield sites in Winklebury, such as the Sycamore Halls site, the Play Council site and Ashwood Park site would be more suitable for housing.

**Policy CN1: Meeting affordable housing**, because the scheme only proposes five 2-bed bungalows and four 4-bed houses, even though there is a significant unmet demand for 4 bedroom properties and 2 bedroom bungalows.

**Policy CN3: Mix for market housing**, because the application does not state what the housing mix is for the market housing, including the provision of accessible and adaptable housing.

**Policy CN4: Housing for older people and specialist housing**, because it is not clear how the needs of older people and people with support needs is being addressed.

**Policy CN6: Infrastructure**, because the proposed infrastructure, in terms of community and health facilities, does not meet the needs of the community that it will serve. The proposals also fail to take advantage of the potential to combine the facilities it is proposing, ie the medical centre, pre-school, community centre and accessible open space, on a single site. In addition, it is unlikely that the medical centre will be delivered, because it is not part of a local NHS strategy and is too small to provide the health services that local residents need.

**Policy CN7: Essential facilities and services**, because the proposed essential facilities and services (ie the medical centre and community facility) fail to meet the needs of residents. The proposed community facility on the ground floor of the Winklebury Centre is not fit for purpose, not accessible, of the wrong size and in the wrong location. The proposed medical centre has been planned without the involvement of the healthcare provider that will run that centre and without the knowledge of the services that it needs to provide. It has not been planned using the hierarchical approach stipulated in the Local Plan nor in line with best practice for NHS healthcare buildings. It is also much smaller than the health and wellbeing hub for Winklebury that is included in the current plan for healthcare services in North and Mid Hampshire.

**Policy CN8: community, leisure and cultural facilities**, because the proposals involve the permanent loss of valued community facilities at Carisbrooke Close, the Play Council site and Fort Hill. These losses will add to the litany of lost community and business facilities in Winklebury over the past few years. Local residents have not been consulted about the permanent loss of any of these community facilities and the council failed to work with residents. The council has failed to work with the local community and voluntary organisations to retain, improve or reuse essential facilities and services, even when local organisations, residents and councillors have approached the council with well-researched proposals to fulfil that purpose.

**Policy CN9: Transport**, because the parking strategy is fundamentally flawed ,with insufficient parking provision for the new residential and non-residential facilities in the scheme and the failure to take any account of the parking needs of existing facilities, eg the church and Castle Hill School. This will inevitably lead to serious traffic congestion around the start and end of the school day and will prevent sick people accessing the proposed health centre.

**Policy EM1: Landscape**, due to the proposed loss of at least 110 trees.

**Policy EM4: Biodiversity, Geodiversity, Nature Conservation**, due to the failure to demonstrate that the proposals meet the relevant guidance set out in the Council's Landscape, Biodiversity and Trees Supplementary Planning Document (SPD).

**Policy EM5: Green infrastructure**, because the plans will result in the loss of the existing open space at Carisbrooke Close, which is highly accessible to residents, well used by residents and is a popular destination for children on their way home from school. The proposals state that residents will be compensated for this loss by making open space on Fort Hill accessible to the community. This space was already accessible to local residents, because they used it for a variety of community activities when Fort Hill was a school and community centre. The loss of the open space on Carisbrooke Close will increase the community's serious shortfall of 21ha of multi-functional green space and cause significant damage to the biodiversity in the area.

**Policy EM7: Flooding**, because the Local Lead Flood Authority (LLFA) is not satisfied that the issue of surface water can be addressed.

**Policy EM10: High Quality Development**, due to the proposed loss of open space, height and scale of the proposed buildings in the Winklebury Centre, lack of parking and poor security to the rear of homes.

**Policy EM11: Heritage**, due to the failure to provide a comprehensive management plan for the Ancient Monument.

## Appendix 1: Glossary of Terms

AST	Assured Shorthold Tenancy
ARRS	Additional Roles Reimbursement Scheme
BDBC	Basingstoke and Deane Borough Council
CANA	Community Assets and Needs Assessment
CCG	Clinical Commissioning Group
CIF	Community Investment Framework
CMP	Conservation Management Plan
GP	General Practitioner
HCC	Hampshire County Council
HGV	Heavy Goods Vehicle
HIOW ICS	Hampshire and Isle of Wight Integrated Care System
JSNA	Joint Strategic Needs Assessment
LEAP	Local Equipped Area for Play
LPA	Local Planning Authority
LRNA	Leisure and Recreational Needs Assessment
MRTPI	Member of the Royal Town Planning Institute
NEAP	Neighbourhood Equipped Area for Plan
NHS	National Health Service
NPPF	National Planning Policy Framework
SAM	Scheduled Ancient Monument
SCI	Statement of Community Involvement
SPD	Supplementary Planning Document
VCSE	Voluntary, Community and Social Enterprise
WMCAG	Winklebury and Manydown Community Action Group
WRRP	Winklebury Regeneration Review Panel

## **Appendix 2: Notice of Motion – The Winklebury Regeneration Project**

Proposer: Councillor Compton-Burnett

Seconder: Councillor Mummalaneni

### **Background to the motion**

The residents of Winklebury want to ensure that the Winklebury Regeneration Project will be public money well spent. This Project represents a once in a generation opportunity for the local councils and service providers to build new facilities that meet the current and future needs of residents and help the community to flourish.

The health and care needs of all our communities, including Winklebury and Manydown, have changed significantly since work on this project started and the government's policies for how these needs should be met have also been updated. Residents believe that the community facilities proposed in the Winklebury Regeneration Project plans do not meet the current or future needs of the community and Manydown and should therefore be reviewed urgently.

In contrast to the approach that has been taken at Winklebury, Chineham Medical Practice was required to provide costed, evaluated options for meeting the needs of their communities. There has not been such a diligent approach taken regarding the Winklebury facilities. It cannot be stated with certainty that public money will be spent to best effect, nor that the Winklebury Regeneration Project will achieve what is actually required of it, nor that it will maximise the benefits to the community when completed.

Policies and plans that should be referenced include the NHS Long Term Plan (2019), Health and Social Care Bill (2021), Annual Report of the Director of Public Health COVID-19: addressing inequalities in mental health and wellbeing across Hampshire 2021-22, HCC A Strategy for the Health and Wellbeing of Hampshire 2019–2024, HIOW ICS STP Strategic Delivery Plan 2019-2024, BDBC Local Plan (2011-2029), the Manydown Outline Plan (17/00818/OUT) and the Winklebury Community Action Plan (2017).

### **Motion**

The Council requests that the appropriate Overview and Scrutiny Committee review and make recommendations to the Cabinet requesting:

- Additional work with Winklebury residents, the Winklebury and Manydown Community Action Group (WaMCAG), local stakeholders, HCC, HIOW ICS and the CCG to review the Winklebury Regeneration Project in the light of up to date data to ensure that this Project complies with central and local government policies; and
- The publication of any findings to ensure that the provision of community facilities in Winklebury not only meets today's community needs, but future-proofs the Project

**The Motion was carried by Full Council on Thursday 24<sup>th</sup> March 2022.**