



## **Whitchurch Neighbourhood Development Plan, 2014 to 2029**

### **Employment Site Selection Overview Addendum Report**

**Version for Regulation 15 Submission**

This document is the Whitchurch Neighbourhood Development Plan Housing Site Selection Addendum intended for submission under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (As Amended).

*Disclaimer: every effort has been taken to ensure that the information in this document is as accurate as possible but no responsibility is implied or taken for errors or omission.*



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# 1. Introduction

- 1.2 This document provides an update to the site selection process used for the allocation of sites for employment in the Regulation 16 Draft of the Whitchurch Neighbourhood Development Plan (WNDP). It also provides updates as to which sites should be allocated for development and sets out the principal reasons for the changes since the Regulation 14 Draft<sup>1</sup>.
- 1.3 This addendum should be read in conjunction with the WNDP Employment Site Selection Report, which accompanies the WNDP.

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<sup>1</sup> Employment Site Selection Draft Report, for Regulation 14 Draft of the Whitchurch Neighbourhood Plan

## 2. Future Employment Land Requirements

- 2.1 BDBC has not identified a strategic requirement for additional employment land in the Whitchurch area, however retains the Strategic Employment Area at Ardglen. There is no new allocation of employment land for Whitchurch Parish in the Adopted Local Plan<sup>2</sup>. Moreover, the Adopted Local Plan supersedes the Saved Policies on the previous Local Plan, thereby removing the previous Employment allocation D3.21 adjacent to Ardglen on the WNDP North West Whitchurch site and D3.18 that provisionally allocated the sites known as R E Thompson and Serendipity Sam's for housing on condition that the D3.21 land be developed for Employment.
- 2.2 The Regulation 14 Draft of the WNDP identifies the local desire for Employment to grow at least with Whitchurch and identifies the needs for indigenous business expansion.

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<sup>2</sup> Basingstoke and Deane Local Plan (2011 to 2029), Adopted May 2016.

### 3. Reconsideration of Employment Site Options

- 3.1 With the removal of the employment land in the Adopted Local Plan the Regulation 14 WNDP draft allocation of the North West Whitchurch site for employment was incompatible with the new Local Plan. Furthermore, the NPSC was advised by B&DBC as part of the Regulation 14 consultation that the fact that North West Whitchurch had not been developed for employment, with the required access through the tunnel, was a credible indication that the site was not viable under those conditions.
- 3.2 With the removal of the employment land in the Adopted Local Plan the Regulation 14 WNDP draft allocation of the North West Whitchurch site for employment was incompatible with the new Local Plan. Furthermore, the NPSC was advised by B&DBC as part of the Regulation 14 consultation that the fact that North West Whitchurch had not been developed for employment, with the required access through the tunnel, was a credible indication that the site was not viable under those conditions.
- 3.3 Therefore the NPSC decided to reconsider the employment sites that had been both offered by developers and formed part of the “*Where Should the Houses Go?*” consultation. The site previously named “South of Blosswood Lane Extension” did not continue to be considered for employment by the owners and the entire site was allocated for housing and open space in the new Adopted Local Plan. The NPSC therefore decided not to consider this further for employment use as it was not considered to be deliverable. The sites are identified in Table 1.

Site option	Ownership	Site area (ha)	Current use/classification	Proposed use	Scale (,000 m <sup>2</sup> )
Site 10: North West Whitchurch (Mixed Use)	The Hospital of St Cross & Almshouse of Noble Poverty	1.2	Disused orchard. Allocated for industrial use in 2006 Local Plan	B1	4
Site 11: North of the railway station	Zurich Assurance	4.0	Greenfield located in AONB	B1, B2 and B8	13

Table 1 Reconsidered Employment site options

- 3.4 Other sites (including without limitation the sites identified as potential housing sites in Whitchurch) were not considered appropriate employment use for the following reasons:
- they were not proposed for employment use by landowners;
  - HGV traffic from employment sites south of the town would have to travel through the town centre to access the A34 and M4 (as A34 access to the south of the town centre is southbound only) and HGV traffic generation was a major concern of residents who responded to the public consultations; and
  - they were remote from the existing Ardglan Road Industrial Estate.

## 4. Site Reassessment Methodology

- 4.1 The objective of the site reassessment process was to identify the most sustainable employment site after the withdrawal of the Employment allocation in the new Adopted Local Plan. For consistency, the method used was the same as in the Regulation 14 Employment Site Selection Report. Additional information was available about both proposals from the planning applications submitted to BDBC.
- 4.2 In addition, the results of the Sustainability Appraisal (SA) of the Whitchurch Neighbourhood (AECOM) were also taken into account in the scoring and selection of scoring criteria. In particular negative impact on land, soil and water resources from both sites; plus the negative impact on landscape from the North of the Railway site guided the scoring.
- 4.3 Both potential employment sites were ranked on the basis of the same assessment criteria used for the Regulation 14 decisions, with the aim of maximum consistency with the previous scoring and only making changes as the result of relevant new information available since the Regulation 14 submission.

### Site reassessment based upon selected BDBC HSAM Site Assessment Criteria (“HSAM-like” criteria)

#### *Basis for any changes*

- 4.4 Both sites were subject to planning applications represent the most up-to-date information on the proposed developments. Application 16/03220/OUT has been taken as reference material for Site 10; application 16/00447/OUT is for Site 11.

#### *“HSAM-like” scoring results*

- 4.5 The results of any changes to the site reassessment score (only criterion with changes since regulation 14 are shown), together with the new totals are given in Table 2. The lowest scores indicate the most favourable assessment of the site and the highest the least favourable.

Criterion	Site 10: North West Whitchurch (Mixed Use)	Site 11: North of the Railway
New local services	3	3 <sup>3</sup>
<b>TOTAL SCORE</b>	<b>31</b>	<b>32</b>
<b>RANK</b>	<b>1</b>	<b>2</b>

Table 2 Changes to the HSAM-like criteria and scoring methodology for Employment site options assessed since Regulation 14

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3 No improvements to local services appear in the Illustrative Site Plan in the planning application

### Site assessment based upon “Vision” criteria

- 4.6 The employment sites were also reassessed against the criteria established during the “Vision” Community Consultation in March 2014.
- 4.7 The results of any changes to the site score (only those criterion which have changes are shown), together with the new totals are given in Table 3.

Vision Criterion	Site 10: North West Whitchurch (Mixed Use)	Site 11: North of the Railway
Includes public open space	1	2 <sup>4</sup>
Provide additional recreational facilities for the Community	2 <sup>5</sup>	3
Impact current traffic black spots of Town Centre and Winchester Road	2	2 <sup>6</sup>
<b>TOTAL SCORE</b>	<b>22</b>	<b>30</b>
<b>RANK</b>	<b>1</b>	<b>2</b>

Table 3 Changes to the Vision criteria and scoring methodology for Employment site options assessed since Regulation 14

### Site assessment based on the Sustainability Appraisal

- 4.8 All potential Employment sites were assessed as part of the SA in the report by AECOM. Due to the proximity of the two remaining sites they have similar sustainability assessments in several categories.
- 4.9 While the SA rates Biodiversity as “uncertain” for both sites, local knowledge suggests that the impact on the SSSIs would be minimal due to the many intervening buffers of roads and housing. This leaves the same Deciduous Woodland as a common factor.
- 4.10 Similarly, the categories of Climate Change, Population and Community, and Economy and Enterprise receive the same assessment for both sites. Though the NPSC observes that the employment type on the North West Whitchurch site is more likely to deliver jobs of similar character than North of the Railway.
- 4.11 Regarding land, soil and water resources, though development of both sites are would remove productive agricultural land, local knowledge of the land on the North West Whitchurch site suggests it has not been used for seriously productive agriculture for many years, unlike the North of the Railway. Furthermore, the SA incorrectly identifies the loss of the allotments, whereas these are to be replaced

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4 No public open space now proposed

5 Though only in the form of open space, allotments being replacement only

6 Town Council recently made aware that the trunk road status means HGVs cannot be prevented from accessing from the south, through the Town Centre



as part of the conditions for the development of the allotment site that has outline planning permission.

- 4.12 Therefore Table 4 lists the differences between the two sites, showing the positive (green), negative (red), neutral (blue) and uncertain (beige) sustainability impacts based on the SEA.

	Landscape	Health & wellbeing	Transport
North of the Railway	Red	Beige	Green
North West Whitchurch	Beige	Blue	Blue

Table 4 Employment site Sustainability differences

- 4.13 The NPSC believes that the landscape impact of the North of the Railway site is under-represented by the coarse scoring method that the SEA uses and therefore this negative impact significantly outweighs the positive impact on transport from that site vis-à-vis North West Whitchurch.

### Actions taken as a result

- 4.14 As a result of this exercise, NPSC concluded that the North West Whitchurch (mixed use) site was the most appropriate site for Employment use in line with its findings, however the employment proposals previously presented to the NPSC by the site owner was for B1 category use only.
- 4.15 The NPSC met with the North West Whitchurch site owner and asked them to make proposals for the scale and type of development which would accommodate the identified requirement of Whitchurch Industry. The responded to the request and presented a schematic layout for an employment development which met the requirement. The owners agreed to modify the proposals for the development of the site in the following ways;
- The number of homes on the site would be up to 60 instead of up to 70
  - Station Car Park is to be increased to 70 places and that St Cross will work with adjoining landowners to ensure that access from the car park is provided directly to the north platform of the railway station.
  - That 2,800m<sup>2</sup> (3,300m<sup>2</sup> with mezzanine) of B1 and B2 employment development would be provided.
  - The site is laid out to ensure that housing is not located directly adjacent to proposed or existing B2 Industry. (B1 or open space to act as buffer).
  - That a Road Traffic Order would be sought to prevent HGV traffic turning right onto Evingar Road.
  - Planting of tree buffer zone to adjacent A34 road and railway embankments. .

- 4.16 The proposed public open space, orchard and allotments, would be transferred to public ownership and management organisation with maintenance funded for 5 years.
- 4.17 In making this selection the NPSC also were also cognisant of the following significant community benefits which were offered by the landowner:
- a new car park for the railway station with footpath links to the north and southbound platforms
  - a large area of open space on the higher land near the A34
  - a community orchard
  - car parking for the allotments
- 4.18 The owner of the site has withdrawn his appeal against the refusal of his planning application which was planned to be heard by the inspector in August 2016 and has re-submitted a planning application which largely includes the modifications agreed with the NPSC.

### Continuing Concerns

- 4.19 Traffic impact on the Town Centre and Winchester Road black spots was assessed as average for this size of development. Access arrangements are a concern including the following:
- though access under the railway would be the ideal solution, B&DBC and the site owner consider this undeliverable, therefore the NPSC preferred access would be through Ardglen Road – which is not the owners proposed access;
  - the owners preferred access presents significant problems on Evingar Road and threatens to make the R E Thompson site less viable as an employment site;
  - HGVs travelling through the Town Centre are of primary concern although traffic order measures could prevent HGV traffic existing the site from travelling south on Evingar Road.
  - The new proposal for the North West Whitchurch site will help to protect the homes developed on the site from noise and vibration from existing and planned industry by the following means;
  - reduced number of homes on the site allowing for increased buffer zones
  - allowing for revised layout of the site which will include the 34 homes planned for the allotments site to reduce the conflict between housing and industry.
  - the inclusion of B1 industry to act as a buffer between homes and B2 industry

## 5. Revalidation of Employment Site decisions

5.1 The Regulation 14 Employment Site Selection Report did not record a number of aspects of the selections made for the Regulation 14 submission. In the interests of completeness, the NPSC formally reconsidered these issues and in most cases revalidated the decisions.

### Reassessment of Employment Sites becoming Housing Sites

- 5.2 As well as the positive reasons to allocate sites for Housing deliberated in the Addendum to the Housing Site Selection Report, given the importance of increased employment identified in the Consultation, it was important to consider the negative aspects of loss of Employment allocation and whether this was justified.
- 5.3 In order to validate the re-designation of sites from current employment use to housing use, the NPSC reconsidered the reasons for the change and confirmed the judgements based on the justifications listed in Table 5.

Re-designated Site	Justification for re-designation
Site 3: Car Centre	It provides a low level of employment; its current use conflicts with the character of that part of Whitchurch; it is a small site; it does not make a positive contribution to the entrance to the town centre.
Site 4: Dances Lane	It is surrounded by housing and the current use or future potential B1 use affects the amenity of the housing; it is a small isolated employment site that is not appropriate for intensification; it provides office employment which is not the type of employment identified in the Employment Survey.

Table 5. Rationale for re-designation of Employment Sites to Housing Sites

### Reassessment of Employment Site previously allocated for Housing

- 5.4 In the case of the site known as Serendipity Sam's (part of Site 2 in the Consultation), allocated for Housing under the Regulation 14 Draft NP, the NPSC considered a number of issues:
- the compatibility of the site with the WNDP policy ES2 regarding noise;
  - removal of its previous allocation for housing (though previously conditional on the development for Employment of the North West Whitchurch site, which never took place) under the new Adopted Local Plan.
- 5.5 Taking these factors into account, the NPSC considered the site no longer suitable for allocation for Housing, therefore retaining its current business use.

### Reassessment of Employment suitability of unallocated housing sites

5.6 The Regulation 14 Employment Site Selection Report rejected the housing sites that were neither chosen for housing, nor offered for employment, on the general

grounds that they were also remote from the Ardglen Industrial Estate and HGV traffic that wanted to travel north would have to pass through the town centre.

5.7 To reinforce this view, a more rigorous assessment of these sites was made, as shown in Table 6.

Rejected Housing site	Reasons for unsuitability for Employment
Site 9: East of Bere Hill	The site is at the top of a hill and would be visible for a considerable distance, particularly from the southern edge of the AONB. There is doubt as to the landscape capacity. Vehicles would have to pass through a residential area. It would be adjacent to housing. In this case, traffic wanting to go south would pass through the town centre.
Site 7: East of the Knowlings	The junction between Micheldever Road and Winchester Road is unsuitable and already congested. Access would likely to have to be through existing housing. The visual impact of a business development on the slope leading down to the river Test would be unacceptable. The site was unpopular in the consultation.
Site 6: North of the Cricket Ground	It is adjacent to the conservation area. It would seriously degrade views across the water meadows towards the church.

Table 6. Suitability of Rejected Housing Sites for Employment

5.8 All these sites were considered unreasonable alternatives for Employment allocation.

## 6. Changes as a result of the Regulation 14 Consultation

6.1 The removal of the Employment allocation in the previous Local Plan and advice under the Regulation 14 consultation from B&DBC has resulted in a series of policy changes being made by the NPSC for the regulation 16 WNDP as follows:

- Allocation of a Mixed Use Employment and Housing Site on the North West Whitchurch site for up to 94 homes (a total including those already given outline permission on the Allotments site) and 4000m<sup>2</sup> of business development with policies as detailed in the WNDP;
- NPSC reserves its position on access to the North West Whitchurch site pending negotiation with the owner and continues to present its preferred access in the Regulation 16 Draft WNDP; and
- removal of the regulation 14 policy allocating the Serendipity Sam's site for Housing.