

# Central Winchester Regeneration

## WinACC response

### Part B Comments

We support in full most of the draft document. We have restricted ourselves generally to commenting on those sections where we would like to see changes.

Overall, throughout the document there is a need to strengthen the wording so that words like 'encourage' are changed to 'require', " and should" to "will".

We strongly suggest that references to "vehicles" are amended to "motor vehicles" to make it totally clear that bicycles are not included.

#### Section 1.4 Vision p7

We very much support this; especially inclusion of 'imaginative re-use of existing buildings' which we hope will reduce the embedded carbon impact.

#### Section 1.5 Objectives pp 7 to 9

We consider that the objectives provide a good basis for what follows, and together set out the type of development we would like to see.

We are particularly concerned to ensure implementation of Objective 5 **Sustainable Transport**, and wish to add Objective 9 **Minimising Emissions, Mitigating Climate Change and Improving Health**.

We suggest that there needs to be a stronger link between the objectives and requirements in the Planning and Design Framework. The SPD should show how each objective is to be achieved, and should not include things that do not contribute to at least one objective. At present, the connection between the objectives and the rest of the SPD is not transparent.

This might best be done by cross-referencing each objective to the relevant pages / paragraphs. Such a list or matrix would be a succinct checklist for developers and development planning officers, and be guidance for planning committee Members.

This clarity about what is expected would be particularly useful when designing developments on land owned by Winchester City Council, whether or not developed in partnership with a developer. The objectives and requirements should be rolled forward as the basis for policies in the next District Local Plan.

#### Objective 1 **Vibrant Mixed-Use Quarter**.

We suggest additional requirements relating to this objective:

- No area of single use to occupy a footprint of more than (for example) 200(?) m<sup>2</sup>.
- No undifferentiated unified element of building design to cover an area of (for example) more than 120(?) m<sup>2</sup> or a frontage of more than 15m.

#### Objective 2 **Winchesterness.**

We suggest additional requirements relating to this objective:

- All proposals must demonstrate that they follow the Winchesterness principles in 2.2, and the definition of Winchesterness set out in Appendix 5.
- All proposed buildings must demonstrate that they comply with the planning and urban design framework (Section 3) for the proposed location.
- All proposals must demonstrate that they have imaginatively re-used existing buildings, wherever possible.

#### Objective 3 **Exceptional Public Realm.**

We suggest additional requirements relating to this objective:

- All proposals must demonstrate that they respect the public realm framework plan (Section 3.2.9) as it affects the proposed location.
- All proposed buildings must demonstrate that they comply with the planning and urban design framework (Section 3) requirements for developments in the proposed location.

#### Objective 4 **City Experience.**

This may add to objectives 1, 2 and 3, but we suggest that the text should set out how this objective is a distinctive addition. If this is an attempt to design in intensity of land use, compactness of facilities, variety of form and activity, interaction of competing and contrasting activities, it should say so. Add:

- All proposals must demonstrate how they will contribute to the City Experience.

#### Objective 5 **Sustainable Transport.**

We consider that the wording here is good. However, a generic encouragement of “public transport” use would be a useful addition.

We suggest adding requirements that tie this in with the more detailed parts of section 3.3:

- All proposals must demonstrate how they will contribute to a legible network which will ease movement for all modes of sustainable transport in the vicinity
- All proposals must demonstrate how their impact on movement patterns will contribute to the Winchester Air Quality Action Plan.
- All proposals must demonstrate that they minimise reliance on motor vehicles.
- All proposals must demonstrate they facilitate low carbon transport (maximising walking, cycling, public transport use, minimising private car use) by all future occupiers of the site including for construction and maintenance, staff, customers, waste, and supplies.
- Proposals should not include facilities for off-street parking.
- Proposals should include sufficient facilities, as appropriate, for cycle parking, in buildings to be used as a daily base for staff.

#### Objective 6 **Incremental delivery.**

We suggest additional requirements relating to this objective:

- All proposals must demonstrate how they will relate to all developments that have so far been given permission and how their construction timetable will fit in with previously agreed programmes.

### Objective 7 **Housing for all.**

We suggest additional requirements relating to this objective:

- All proposals must demonstrate how they are consistent with the requirements of the NPPF and LPP1 policies CP1, CP2, CP3 and DM2.

### Objective 8 **Community**

If the results of the community engagement are fully embedded in the final document, the wording should be more confident. We suggest replacing 'should build' with 'builds'. The responsibility here is JTP's and WCC's, so we are not suggesting any requirements for developers.

### **New Objective 9 Minimising Emissions, Mitigating Climate Change and Improving Health**

The CWR must have minimal impact on climate change and contribute to the reduction of city centre emissions, which will reduce air pollution. We welcome the many suggestions which will enhance the area for people using active forms of transport which support them to live a healthier lifestyle. The following design requirements should be added:

- 9.1 All proposed buildings will be to BREEAM excellent standard. On land owned by WCC additional energy-saving features will be required, and elsewhere positively encouraged.
- 9.2 All proposals must provide roof aspects suitable for solar energy-producing equipment (e.g. photovoltaic and thermal panels) facing SSE to SSW. Inclusion of the equipment itself will be encouraged.
- 9.3 All proposals should include space suitable for battery equipment associated with generation of solar energy.
- 9.5 All proposals should include equipment to prevent heat/cooling loss, enabling occupants to make full use of heat exchanging ventilation systems, and providing automatic door-closing systems.
- 9.6 Developments should pay particular attention to the requirement of the building regulations to assess renewable energy options. In order to minimise emissions, we would like developers to evidence that the design maximises the use of renewable technologies.
- 9.7 All proposals should demonstrate that they have explored combined heat and power (CHP) systems, and that where feasible they will take part in them. Developments will be favoured if they incorporate CHP, and/or piping which will enable them to be linked to a future district heating network. We would like reassurance that developers are aware of the discussions about the possibility of a district heating and/or CHP scheme including other large local buildings such as the Civic Offices/Guildhall; and that the buildings include the pipework for heat distribution, something which is cheap to install as part of initial building and virtually impossible to retrofit. District heating networks are normally preferable to individual domestic heating being not only more cost-effective but also easier to adapt to changing renewable heat technologies. A mixed residential and retail development can optimise the complementary use of local renewable energy measures such as sharing day-time and night-time energy uses, or linking heating and refrigeration.

### Section 3.2.8

It is unclear what the statement 'the Public Realm Framework Plan is a mandatory requirement of the SPD' applies to? Is it to the whole of section 3 or something more limited? It would be helpful to make this clearer.

### Section 3.2.10 1. The Broadway

We would like to see the *whole* of the Broadway given pedestrian priority.

In our view, the space is too valuable a feature to be used as coach terminus. Visiting coaches could either use St Catherine's Car Park and the Park-and-Ride buses, or approach Winchester along Barfield Close and return along Chesil Street, with a set down / pick-up point near Chesil Car Park. Service coaches could be diverted to the west of Winchester along Badger Farm Road / Romsey Road, and along the A34, so they can set down / pick up at the railway station, or call at St Catherine's. We suggest a stop at the railway station to maximise connectivity.

We are concerned that there is too large a gap between the bus stops at the Broadway and the new proposed bus hub, which will cause problems for people coming from Alresford and going to any other part of Winchester, especially people with suitcases going to the railway station. See our comments under Section 3.3.15 Bus and 3.6 Bus Hub below.

Colebrook Street Car Park makes a minimal contribution to parking in Winchester and causes a maximum of pollution and disruption. The car park should be closed to remove conflicts between cars accessing it and pedestrians and stalls. This area used to have terraced housing and would be suitable for this use again.

The artist's impression on page 26 ignores the intrusion by parking cars and terminating coaches inherent in the proposal.

### Section 3.3 Movement and Accessibility

We welcome the values of this section. We consider that more work needs to be done on other sections to ensure that the values in 3.3 are embedded in what will be implemented. We have commented on those paragraphs where we think this can be done.

### Section 3.3.3 City-wide vehicular movement

We support what is included here but would like the scope to be extended to include all types of movement city-wide.

### Section 3.3.7 Car Parking

The SPD provides an opportunity to sort out the inconsistencies in WCC's car parking strategy and its conflicts with subsequent LPP2 Winchester Policies. There seems little value in describing the '3-ring' strategy without setting out what the development path for each ring will be. Paragraph 3.3.8's desire that people park in 'the most appropriate place' is not a useful statement in a planning guidance document. Policies that distinguish these rings need to be explicitly stated in this document if it is to be a planning guidance document. We suggest that it is implicit in the rest of the document that the emerging policies are:

- **Centre:** reduce parking spaces to minimise the volume of traffic entering the centre and decrease pollution, noise, and vehicular intrusion, concentrating on sufficient provision of spaces for people with disabilities, residents and car clubs.
- **Inner:** provide 'gateway' car parks at the point of entry for evenings and periods of up to 4 hours in the daytime to intercept cars that would otherwise enter the centre, and to remove the habit of shoppers of parking in the centre.
- **Outer** to encourage all people who visit and work in Winchester to park in this ring as their first choice, by keeping prices low and providing frequent public transport.

It is clear from research in other towns with greater pedestrianisation that these areas are popular and with all who use them including the retail and business community.

### Section 3.3.9

"CWR area sits within the centre ring, where the principle is to have enough parking spaces in appropriate locations to ensure the success of the city and improve the quality of the environment" is ambiguously worded, leaving room for different future interpretations of what is an "appropriate" location, and what defines the "success of the city". We would remind the council that research evidence demonstrates that less car use *improves* the economic vitality of town centre shopping areas. We suggest that it should be reworded as follows: "CWR area sits within the centre ring, where the principle is to have enough parking spaces to ensure the economic success of the city and improve the quality of the environment". This is a good opportunity for the council to repeat some of the wording from the overarching theme in 1.5.2 of 'delivering a mixed use pedestrian friendly quarter', and be explicit that:

- Within the centre ring the council intends to limit parking to people with disabilities, residents of existing properties and car clubs.
- The council intends to ensure the success this development and centre of the city generally by reducing the volume of traffic in the centre, thereby reducing pollution, noise, and conflict between cars and pedestrians and bicycles.

While some of this is covered by 3.3.12, a stronger tighter policy statement would be helpful about what would ensure the success of the city, as would a general statement about car parking that applies to more than Middle Brook Street car park, and explains what the impact would be of the 'reconfiguration' mentioned in 3.3.12 and the 'consolidation' mentioned in 3.3.9.

We suggest adding to the phrase "consolidate parking" the qualifier "where opportunities arise so that fewer sites and less land are used by for car parking".

### Section 3.3.13 Pedestrian

This paragraph is very welcome, and we fully support it. Connections beyond the boundary are important, and some are shown on the plan provided at the top of page 39. It would be useful to describe in the text the four green arrows and consider the need for additional ones, so that these needs are not overlooked in the Movement Strategy.

### Section 3.3.14 Cycling

Again, the support for cycling is welcome. However, the need for better cycling connections beyond the site boundary needs to be highlighted, and a map similar to the one provided on pedestrian movement is probably necessary, to include movement within the site and with

a text description of problems beyond the boundaries. Direct cycling access to the site, without dismounting or breaking the rules in at least one direction, is difficult from the south, south west, west, and north west. Explicit reference to problems would ensure they will be addressed by the work on the Movement Strategy.

### Section 3.6 Bus Hub

We welcome the commitment to providing good facilities for bus users, and prefer option B for the diversion of Friarsgate because it reduces the need for pedestrians alighting from buses to walk across vehicle routes to get to the town centre. We would like to see an extension of the bus hub if it would obviate the use of Broadway for services to the east of Winchester (Alresford). We would prefer buses serving areas east of Winchester to terminate at the railway station rather than in Broadway, to reduce the need for people to change buses to get to the station, especially if this involves walking with luggage. This is a valuable opportunity to increase connectivity between modes of transport. Most major services would then serve both the centre and the railway station. Either way there seems little reason to terminate any buses in Broadway.

### Section 3.10.11

It would be useful here to add two separate points about sunlight. Not only is it important to orientate buildings, to maximise potential for solar energy (whether PV or water). It is also important to mitigate the likely increases in summer temperature linked to climate change, and therefore the importance of reducing insolation, whether by orientation, planting, or moveable arrangements for shading windows. (We appreciate this is partly covered in 3.17 but it should be clearly stated here too.)

### Sustainability

#### Sections 3.16, 3.18 and 3.19

Fifty years ago, Winchester was well supplied with public drinking fountains. We would like to see fountains introduced because the transport of bottled water adds to harmful transport emissions totally unnecessarily (3.16), and because of the need to reduce waste (3.18) and especially plastic waste (3.19).

### Section 3.17

We suggest that it is not enough to repeat in para 3.17.2 the Local Plan Part 1 requirements for the Code for Sustainable Homes (CSH) and BREEAM. CSH no longer exists, so the SPD should refer to the Building Regulation which has replaced it. In our view, the SPD should emphasise that the levels set out in LPP1 are the *minimum*, and that developments that achieve higher levels of sustainability will be preferred.

Roads and buildings should be orientated to maximise the use of natural daylight, passive solar heating and integrated renewable technologies. WinACC welcomes the introduction of streets running north to south, which create permeability for walkers and pedestrians as well as being a good orientation for passive solar gain, PV generation and solar thermal heat collection.

In general, we oppose the demolition of sound, usable structures with large embedded carbon, unless a proposed development can demonstrate that the new development delivers a better carbon footprint across its expected life.

3.17.3 – In addition to “fabric first”, we would like to be reassured that the buildings have been designed for long-term adaptability – long life, loose fit, low energy. We would want the design to minimise the use of new materials with high embedded carbon content, and to favour the use of renewable materials which lock in carbon such as sustainably sourced timber and of recycled materials to minimise embedded carbon.

We welcome high density dwellings.

WinACC

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