



**Hampshire &  
Isle of Wight  
Wildlife Trust**

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For the attention of  
Amy Winch  
Winchester City Council  
City Offices,  
Colebrook Street,  
Winchester,  
SO23 9LJ

5<sup>th</sup> December 2023

Dear Amy Winch,

**23/02507/OUT | Outline planning application with all matters reserved apart from access, for the demolition of all existing structures on site and redevelopment to provide a phased employment led mixed use scheme comprising a knowledge quarter of up to 96,500 square metres of Gross Internal Area (excluding car parking). This outline application is accompanied by an Environmental Statement in accordance with Environmental Impact Assessment Regulations 2017.**

Hampshire and Isle of Wight Wildlife Trust **objects** to the proposed development for Bushfield Camp on the grounds of the direct loss of Bushfield Camp SINC, the loss of priority habitats and species, the fragmentation of the Nature Recovery Network and unmitigated recreational impacts on River Itchen SSSI/SAC and St Catherine's Hill SSSI.

Bushfield Camp holds immense importance for both wildlife and the local community and was designated by Winchester City Council as a SINC as a result. Over the past half-century, it has evolved from a brownfield site into a haven for diverse flora and fauna, including Cinnabar moth, Spotted Flycatcher, Grizzled Skipper, Dingy Skipper, Small Heath, Linnet, and Red Kite, Bullfinch, Linnet, Song Thrush, Turtle Dove, Yellowhammer, among many others. The site has naturally 'rewilded' over the years and now holds key priority habitats including Lowland Meadows, Lowland Calcareous Grassland, and Lowland Mixed Deciduous Woodland. Bushfield Camp serves as a key link in the Nature Recovery Network, fostering connectivity within the broader landscape and the nearby designated sites.

Simultaneously, Bushfield Camp has become an integral part of the local community's green infrastructure network, particularly during the pandemic when wilder, natural spaces such as this gained heightened appreciation.

The recent nature emergency declaration by Winchester City Council in September 2023 underscores the urgent need for nature's recovery and investing in nature-based solutions. Bushfield Camp, as a designated Site of Importance for Nature Conservation (SINC) and a crucial component of the Nature Recovery Network, occupies a central role in realizing these objectives. The proposed development, with its potential loss of the SINC habitat and adverse impacts on the interconnected ecological network, stands in direct contrast to the council's nature emergency declaration.

#### **Direct Loss of SINC in a Key Area of the NRN:**

The Trust is concerned that the proposed planning application for Bushfield Camp would cause the direct loss of the Site of Importance for Nature Conservation (SINC) within the site. This designated area plays a pivotal role in supporting a diverse array of notable and protected species, including White

Helleborine, Tor-grass, Cinnabar, Spotted Flycatcher, Grizzled Skipper, Dingy Skipper, Small Heath, Linnet, and Red Kite. The SINCC contains key priority habitats, including Lowland Meadows, Lowland Calcareous Grassland, and Lowland Mixed Deciduous Woodland.

In particular, on site there is currently relic chalk grassland, some of the last remaining in walking distance from the city centre, which can hold immense biodiversity value and is a habitat which is fast disappearing locally and nationally.

Bushfield Camp is a key arc site in the local Nature Recovery Network, serving as a vital link to the wider landscape. The potential loss of this critical connection, given its location adjacent to Whiteshute Ridge and proximity to the River Itchen SSSI/SAC and St Catherine's Hill SSSI, threatens to isolate and fragment the ecological network. This fragmentation undermines the interconnected habitats and species within the area, hindering the council's overarching goal of tackling the nature emergency.

As such, we consider that the proposals are not in line with Winchester City Council's adopted Local Plan policy CP16, which states: "The Local Planning Authority will support development which maintains, protects and enhances biodiversity across the District, delivering a net gain in biodiversity, and has regard to the following:

- protecting sites of international, European, and national importance, and local nature conservation sites, from inappropriate development
- maintaining a District wide network of local wildlife sites and corridors to support the integrity of the biodiversity network, prevent fragmentation, and enable biodiversity to respond and adapt to the impacts of climate change."

Furthermore, whilst the proposals commit to provide a biodiversity net gain of at least 10%, the minimum required by the Environment Act (2021), this is somewhat ironic given the proposals will cause losses of a locally important site for nature conservation, important areas of priority habitats and a wide diversity of species. It is disappointing to see such a glaring lack of ambition.

### **Loss of green space**

The proposed development will result in the loss of a sensory-rich green space that is highly valued by the local community. Over the past 50 years, Bushfield Camp has served as an essential green and wild space, enjoyed and loved by the community. Describing it as a derelict, brownfield site neglects its role as a naturally 'rewilded' area.

The special importance of Bushfield for people and wildlife, as the last remaining wedge of Winchester's traditional chalk down-land within easy walking distance of the City Centre, has long been recognized. It is clear that Bushfield Camp is a well-used and valued green space for local residents. Over the years there has been numerous campaigns to effectively protect the site as green space or a 'village green'.

While the plans state they will provide green infrastructure, the proposed development will provide an overall net loss of biodiversity-rich green infrastructure and damage the integrity of the green infrastructure network across Winchester. This would run counter to Policy on Green Infrastructure (CP15) in the Winchester City Council adopted Local Plan: "The Local Planning Authority will support development proposals which:

- maintain, protect and enhance the function or the integrity of the existing green infrastructure network identified at a District and sub regional level, including strategic blue and green

corridors and spaces, as illustrated on Map 9 particularly where the proposal allows for the enhancement of GI both on-site and in the immediate area;

- provide a net gain of well-managed, multifunctional green infrastructure, in accordance with the categories and standards specified in Policy CP7 and appropriate for the scale of development,"

### **Recreational pressure on SSSI and SAC**

In the proposal's Environmental Statement (Chapter N), the applicant states: "For the cumulative schemes identified, the most likely cumulative impacts would be an increase in visitor numbers (recreational pressures) to designated sites such as the River Itchen SAC. In the schemes identified, this is not a concern because none of the schemes are very large residential developments and where there is housing proposed, alternative green space is being built into the scheme's design. In addition, for some of the more sensitive sites within the area such as Emer Bog SAC, public access is not allowed in many parts of the Site." As landowners of Emer Bog this statement is inaccurate. Recreational disturbance is an existing and growing factor for the Wildlife Trust's management of the nature reserve and the conservation status of Annex I listed birds under the Birds Directive (Nightjar & Woodlark).

The Trust considers that the proposals fail to appropriately identify the impacts of recreational pressure on the designated sites, including the River Itchen SAC and St Catherine's Hill SSSI and HIWWT nature reserve. The proposals for academic and hotel accommodation would likely have an adverse impact on the designated sites, whose residents would be seeking the nature-rich river walks or the expansive open space provided at St Catherine's Hill HIWWT nature reserve – a site already under considerable pressure – no matter the quantity of on-site green infrastructure. In particular, the academic accommodation alone would create over 525 beds (Environmental Statement: Volume 3 – Non-Technical Summary, 3.4), leading to a likely increase in recreational pressure for the nearby designated sites.

The absence of mitigation and compensatory measures for the anticipated increase in footfall along the River Itchen SSSI/SAC and St Catherine's Hill SSSI is a critical concern for the Trust, in particular the impact of recreational pressure on our management of St Catherine's Hill nature reserve. We emphasize the precedent set at Barton Meadows, where mitigations were established for recreational pressure. The Trust urges careful consideration of the potential adverse impacts on these sensitive, designated areas.

The need to address the cumulative impacts of the proposals on the River Itchen SAC and St Catherine's Hill SSSI is also outlined in the adopted Local Plan policy for Bushfield Camp WT3, which states: "Proposals must resolve the long-term future of the site by securing sustainable development and delivering a high quality, accessible scheme which meets the following criteria:

- includes a Sustainability Appraisal and Habitats Regulations Assessment to consider the potential effects on biodiversity, on-site and on the River Itchen, and the possible in-combination effects of the development on nearby sites of national and international importance. The development proposals must meet the tests of the Habitats Regulations and be accompanied by a full set of measures to avoid or mitigate the local and wider impacts of the development;"

### **Landscape**

The topography of the site means it is visible from a wide area, as identified in the ‘Winchester City and its Setting’ report, which recognises the significance of the site to the setting of the City as a whole. The Trust has concerns regarding its potential impact on the landscape character and historical assets. It is anticipated that the development may impact historic holloways, historic hedgerows, boundary stones, and the setting of scheduled monuments at St Catherine’s Hill and Twyford Down.

The elevation of the proposal, particularly from important areas and elevated points like St Catherine’s Hill, impacts the broader landscape and the region’s rich natural heritage. The current plans suggest buildings of up to four stories high, a significant alteration to the existing visual landscape. Furthermore, this does not appear to be clearly represented in the proposals. For example, current Viewpoint 1 AVR St Catherine’s Hill is not presented at the full elevation of the hill, artificially reducing the true visual impact of the development’s effect on St Catherine’s Hill and the wider landscape.

We therefore consider the plans may not comply with the Local Plan Policy on Heritage and Landscape Character (CP20): "The Local Planning Authority will continue to conserve and enhance the historic environment through the preparation of Conservation Area Appraisals and Management Plans and/or other strategies, and will support new development which recognises, protects and enhances the District’s distinctive landscape and heritage assets and their settings. These may be designated or undesignated and include natural and man made assets associated with existing landscape and townscape character, conservation areas, scheduled ancient monuments, historic parks and gardens, listed buildings, historic battlefields and archaeology."

### **Considerable Intensification and Divergence from Local Plan policy WT3:**

WT3 of the adopted Local Plan allocates land at Bushfield Camp as an employment site. However, the outline application describes the development as a “knowledge quarter” and includes uses including employment, research and development, academic uses, academic accommodation, a hotel, ancillary uses including nursery, shops, restaurant, café, bars, visitor space, exhibition space, leisure and sports use”.

The wide range of proposed uses goes way beyond the “employment use” in the Local Plan policy on such a sensitive site. As a result, it is likely that proposed development is likely to have a much more significant impact on the landscape, on traffic, air quality, and biodiversity.

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The Trust strongly urges Winchester City Council to reject these proposals and instead explore alternative options for the site to safeguard the Bushfield Camp SINCs and retain the site as a key part of the Nature Recovery and Green Infrastructure Networks. For example, Bushfield Camp could be designated as a strategic nature mitigation site, aligning with Biodiversity Net Gain and nutrient neutrality goals. Eastleigh Borough Council recently took this approach to acquire Stoke Park Farm to deliver nutrient neutrality and Biodiversity Net Gain within their borough, which is the sort of forward-thinking approach we need to see from all local authorities. Across Hampshire, it is now vital to take a strategic approach to ensure that true gains for nature are delivered, particularly within close reach of where communities can benefit. As the Local Nature Recovery Strategy is created and implemented, we expect to see councils using the LNRS to understand where strategic mitigation can be delivered to provide the most additional benefits for people and nature. Sites such as Bushfield Camp are likely to form a key site of the identified Local Nature Recovery Strategy.

The above advice is given based on the information made available at this time and may change should further or amended details be submitted. We trust that you will find our comments helpful and if you wish to discuss these matters further, please do not hesitate to do so. I also ask that you keep the Trust informed of the progress and outcome of this appeal.

Please don't hesitate to contact me with any queries.

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