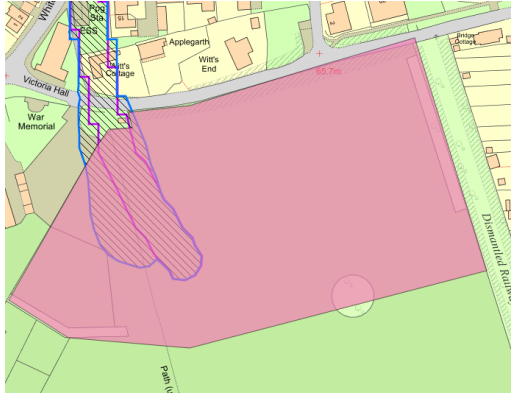


Sutton Scotney omission sites

Respondent number	Comment	Officer comment
<p><u>BHLF-KSAR-N867-4</u></p>	<p><b>LAND SOUTH OF WONSTON ROAD, SUTTON SCOTNEY REGULATION 18 REPRESENTATIONS</b></p> <p>These representations are submitted to the Winchester Local Plan Review Regulation 18 on behalf of our clients, Fred Schiff and the landowners the Martinos family, in respect of land south of Wonston Road, Sutton Scotney.</p> <p>An Illustrative Land Use Plan is also enclosed at <b>Appendix 1</b>, which identifies the location and scale of different land uses and the opportunity that exists to deliver residential development.</p> <p>For clarity, the representations are focussed on Policy H1, H2 and H3 of the Plan. Related background evidence is referred to as necessary.</p> <p><b>Background</b></p> <p>It is understood that following evidence base work in preparation for the Local Plan, Winchester City Council have advised Wonston Parish Council that a figure of 50-60 dwellings has been identified for Sutton Scotney to contribute toward meeting the district's wider housing requirement.</p> <p>Currently only one site is identified within the Strategic Housing and Employment Land Availability Assessment (SHELAA), published in 2021, with a capacity of accommodating this level of growth. This is site reference WO10 and is located north of Sutton Scotney, beyond the A30, and has an identified capacity of 95 dwellings.</p> <p>The land south of Wonston Road has only recently become available, hence why it was not formally submitted to the SHELAA. However, there remains an opportunity for it to be considered as a potential allocation in the emerging Local Plan, as an alternative to the site reference WO10.</p> <p><b>Regulation 18 Local Plan</b></p>	<p>Comments noted</p> <p>The attributes claimed for the site and the nature of development proposed are noted.</p>  <p>The Development Strategy and Site Selection 2022 document sets out the process that was followed to arrive at the site allocations in the Regulation 18 Local Plan.</p> <p>The decision to not allocate this site is based on the flood risk associated with part of your site. Specifically, a portion of the site is situated within Flood Zones 2 and 3. These areas are</p>

	<p><i>Housing Need</i></p> <p>It is welcomed that at paragraph 9.14 of the Local Plan does use the Standard Method (SM) requirement advised by national policy as the starting point to determine the minimum housing requirements. The most recent published requirement dates from March 2022 and equates to 715 dwellings per annum.</p> <p>The Plan confirms this is used as a basis for determining requirements at paragraph 9.14 and Table H.</p> <p>However, Table H does ‘back-date’ the SM requirement that was relevant at the time of the previous 3 years of the Local Plan period (which was less than 715). National Planning Practice Guidance (NPPG) does not advocate this approach, and it is unclear this is a reasonable interpretation. The household projections on which the standard method is based date back to 2014, pre-dating the Local Plan period.</p> <p>The Plan also includes a 1,450 housing requirement ‘buffer’ for meeting for unmet needs in neighbouring local planning authorities, primarily with in the Partnership for South Hampshire (PfSH). This allowance is also welcomed, though whilst the Plan advises the exact requirement figure is still in discussion within PfSH, it is unclear how the figure has been calculated.</p> <p>What is evident from plan preparation across South Hampshire is that there are unmet needs arising in a number of areas including Portsmouth, Southampton, Gosport, and Havant. The first three authorities in this list have set out in recent consultations the shortfalls expected in the future with these totalling nearly 13,000 homes. This is a significant shortfall and whilst clearly Winchester cannot be expected to meet all of these needs it should be looking at developing a spatial strategy that would meet more of these needs than is currently being proposed.</p> <p>The Integrated Impact Assessment (IIA) Report does not appear to test a strategy that goes beyond what is being proposed in the consultation document. Option 1A tests an option that delivers an additional</p>	<p>recognised as having a higher probability of flooding, which poses considerable challenges for safe and sustainable development.</p> <p>Moreover, the sections of your site that fall within these flood zones are also the areas that would provide the safest and most feasible access routes. Ensuring safe access is a critical component of our site selection criteria, as it is essential for the safety and wellbeing of future residents, particularly during potential flood events.</p> <p>We have a responsibility to adhere to national planning policies and guidance that prioritise the safety of developments in flood-prone areas. In line with this, we must ensure that any allocated sites have secure and safe access, minimising the risk to both future occupants and emergency services.</p> <p>There are also concerns from a landscape perspective as in the landscape assessment this site was assessed as being moderately sensitive all the same due to being a part of the unspoilt rural countryside</p>
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	<p>2,000 homes but states in 4.117 that it the Council expects the PfSH to identify and deal with unmet need for housing. Whilst the PfSH provides welcome coordination on such matters it is still the responsibility for the Council's in this area to plan for unmet needs through the preparation of their local plans. Indeed, this is the only mechanism unless a joint local plan is being prepared that will take on this responsibility. The Council must therefore examine strategies that contribute more towards the unmet needs of other areas and allocate more sites for residential development in the next iteration of the local plan.</p> <p><i>Housing Requirements</i></p> <p>In meeting housing requirements over the plan period, the Plan identifies a windfall provision of 1,975 dwellings based on background evidence prepared, '<b>Windfall Assessment</b>' (2021). However, paragraph 6.1.6 of the background paper, concludes that windfall allowance of 1,725 dwellings (based on 115 dwellings per annum), should be used. It is unclear where the additional 250 allowance has been identified from. Notwithstanding the above, the background paper acknowledges that the windfall allowance of 115 dwellings per annum is in excess of the 70 dwellings per annum that was considered appropriate as evidence in the adopted of the current adopted Plan. Given that opportunities for windfall development would naturally be expected to decline as more potential appropriate sites are developed, if anything it would be expected this figure would be reduced.</p> <p>St. John Moore Barracks is identified for a mixed use allocation including significant residential provision within Policy W2 of the Local Plan. The plan assumes provision of 900 dwellings over the course of the plan period to 2039, based on a phased closure of the facility between 2022 and 2024. The Ministry of Defence has recently announced that this will be delayed for a further 2 years and the Barracks will not be vacated until 2026.</p>	<p>which lies to the south of the village – the Wonston Downs - which it is considered makes a significant contribution to the distinctive character, identity and setting of the village of Sutton Scotney.</p> <p>Recommended response: no change</p>
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This decision will inevitably delay delivery of any allocation in the Plan, and therefore delivery of housing from the site in the plan period. The scale and complexity of the development and draft policy allocation will require significant details to be resolved before submission. The consequential timescales for an application preparation and submission, subsequent determination and legal obligation commitments, conditions discharge, site works, infrastructure provision etc., would have made it very challenging to secure all of the housing delivery in the planning period in any case. These delays will very likely extend some housing delivery beyond the end of the plan period.

*Spatial Distribution*

**Policy H3** of the Plan identifies Sutton Scotney as an 'Intermediate Rural Settlement' where some additional housing provision to meet housing needs over the plan period is identified. This is a reflection of the facilities and services available within the village, and its relative sustainability credentials as a consequence. My client would agree that the village does represent a suitable location to accommodate some new housing.

The Plan sought to identify new sites for 50 to 60 dwellings for each of the 'intermediate' rural settlements, including Sutton Scotney. However, the Plan states that '*It has not been possible to identify a new allocation at Sutton Scotney at this stage until foul drainage issues are resolved.*' Paragraph 14.133 goes on to confirm that '*investigation of the few potential development sites has revealed substantial foul drainage issues*'.

Further detail is provided within the '**Development Strategy and Site Selection 2022**' background paper. Para 6.46 advises whilst '*Southern Water have a proposal to remedy the situation but they do not at present have agreement with a number of landowners on the proposed alignment of a new waste pipe from Sutton Scotney to the sewerage pumping facilities at Harestock Road in Littleton.*'

The Council does refer to the advice in national planning guidance that local planning authorities should consider if infrastructure constraints can be overcome before ruling out development options. Assessing infrastructure needs is an integral part of plan-making and should identify where opportunities exist to remedy and upgrade provision to deliver housing needs. (NPPG Paragraph: 059 Reference ID: 61-059-20190315).

Nevertheless, it is concluded that *'on balance, it is considered that in this case, there remains sufficient doubt that a satisfactory solution can be achieved and therefore it is not considered appropriate to allocate sites for further development at this time, given that the overall level of housing need can be met at other locations.'*

My client acknowledges that there is a current capacity issue. However, the site provides a unique opportunity to deliver housing of 50-60 units whilst not only ensuring that there is no adverse effect on the existing wastewater, but also reducing the risk of surface water flooding to parts of the existing village. This is considered in below, and in more detail within the accompanying Surface Water and Drainage Strategy report prepared by specialist drainage consultants on behalf of my client.

#### **Site context**

The land is located immediately south of Wonston Road and extends to approximately 2.6 hectares.

Existing housing extends along the opposite side of Wonston Lane to the north, and to the east along Wonston Close and Harding Close. The Victoria Hall car park is located to the north-west, with Manor Farm House and related outbuildings immediately beyond.

There is extensive existing trees and vegetation on the northern and eastern boundaries, mature trees on the combined with its low-lying nature it is well contained from wider views. There is a public footpath that extends north-south through the eastern part of the site.

There is small strip of Flood Zone 2 and 3 that extends from Wonton Road into the site for a distance of around 30-35 metres, broadly including the footpath and area immediately adjacent. The village has experienced flooding as a consequence of ground water emergence due to springs and a high groundwater table.

The site is outside but adjacent to the Conservation Area boundary, which extends along the northern side of Wonston Road. There is Grade II Listed Building (Witt's Cottage) to the north of Wonston Road opposite the War Memorial, which is also Grade II Listed. Manor Farm House is also Grade II Listed, and both the house and it's outbuildings are also within the Conservation Area.

There are no ecological designations directly affected by the site, although it is within the catchment of the River Dever Site of Special Scientific Interest (SSSI).

There is an existing culvert adjacent to the site. The culvert is approximately 380m in length and its entrance includes ditches to channel runoff from the adjacent open land.

#### **Suitability of Site**

The accompanying site plan (**Appendix 1**) identifies a potential residential development extending to approximately 1.75 hectares, located to the east of the public footpath, and extending from Wonston Road southwards to the existing circular group of trees, which, along with all boundary trees and vegetation, would be retained with suitable buffers provided. Some further tree/hedge planting could be included along the southern boundary to supplement this existing vegetation. This would supplement further hedge/vegetation boundary extends east/west to the south on higher ground providing additional containment.

Access would be taken from Wonston Road, with an indicative location shown. An initial assessment of the suitability of an access has been undertaken on behalf of our client by transport consultants. This has

confirmed that an access can be provided without compromising highway safety. The exact location would be determined based on providing suitable visibility splays, avoiding any conflict with existing access to properties adjacent, and retaining as much vegetation as reasonably possible. To improve pedestrian safety, consideration would be given to providing a segregated footway or formal pavement extending westwards from the access along the south side of Wonston Road. New hedgerows and vegetation could be planted behind any footway to retain the semi-rural character of Wonston Lane and respond to the setting of the Conservation Area.

The site plan shows an extensive area of open space of approximately 0.6 hectares extending to the west of the footpath. This area could include a play space, kickabout area and/or community orchard. It would also be suitable for an extension to the village car park. This could be further discussed with the Parish Council to understand what form this might take to best respond to the needs of the community.

Our clients are very keen to ensure a high-quality development is provided in keeping with the character of the village and responding to the context adjacent to the Conservation Area. The net density of the development area would be around 30 dwellings per hectare to ensure a lower density layout that provided space for new trees and hedges and responded to the edge of village character. This would suggest a capacity of approximately 55-60 units.

A illustrative site plan is included at **Appendix 1**, which identifies both the extent of the site and the potential land uses that could be provided to deliver a scheme appropriate to its context.

#### Drainage

Critically, the presence of the adjacent culvert is an ideal point of connection for the site for mitigating both foul and surface water generated by the development. A separate Foul and Surface Water Drainage Assessment (November 2022) has been prepared by specialist

drainage consultants Syntegra setting out both how the necessary infrastructure could be delivered, but also how this would alleviate existing surface water flooding within the village. This is included at **Appendix 2**. In short, a suitable waste-water treatment system (Klargester Biodisc system or similar) of around 20m<sup>2</sup> in size can be accommodated within the site incorporating multiple treatment stages and with a discharge direct to the culvert adjacent. The most appropriate location would be within the potential open space area. The proposal can also be appropriately sized to cater for neighbouring residences which would assist in reducing pressure and capacity of Gratton Close Sewage Treatment works.

The EA surface water flood map indicates a flow path from the agricultural fields to the south, including the site, towards the watercourse to the north-west. Through development of the site, it is considered that the runoff can be effectively managed and more importantly significantly reduced through the use of SUDS systems on site to convey, and attenuate surface water and provide source control. The sites SUDS systems will effectively act as additional flood alleviation to Sutton Scotney and cater for climate change growth. The discharge to the existing culvert and watercourse can be controlled and released in a timed manner. The resulting effect would be a reduction in flood risk to the local area safeguarding its future, reducing financial loss. This would also present an opportunity for improving biodiversity and delivering some mitigation to off-set nutrient impacts.

In summary, the development of the site represents a unique opportunity to not only deliver development without impacting on the existing drainage infrastructure, but also to reduce the risk of surface water flooding.

Viability

As part of discussions with both Wonston Parish Council and City Council officers about the opportunity this site presents, it was requested that a separate viability study be undertaken to demonstrate that a



policy compliant development could be delivered, notwithstanding the additional costs associated with drainage infrastructure provision. This is included at **Appendix 3**. The report concludes that the proposed development can viably deliver a policy compliant scheme to include 40% affordable housing.

### **Summary**

It is considered there is a high degree of risk that the Plan will not provide sufficient housing to meet requirements. Sutton Scotney has been identified as an intermediate rural village which would have been expected to accommodate around 50-60 houses to assist in meeting these requirements. However, as a consequence of current drainage infrastructure issues informed in discussion with Southern Water, and the conclusion that other commitments and allocations would be sufficient to off-set this shortfall, the Plan makes no allocations within the village. Through more detailed drainage assessment of this site it has been identified that its development represents a unique opportunity to deliver drainage infrastructure that will not adversely affect waste water capacity within the village, but reduce the impact of ground water flooding. This has been discussed at a high level with both Wonston Parish Councillors, Winchester City councillors and planning policy officers, and there has been a willingness to explore this opportunity further.

There are no other insurmountable constraints on-site.

The site is well related to the existing settlement and within walking distance of village facilities and bus stop connections. It is well contained by existing landform and vegetation to minimise impact on the wider landscape. It can also deliver extensive open space and safeguard the existing public right of way.

Safe access can be provided on to Wonston Lane. The provision of open space would assist in meeting a recognised shortfall of 1.39 hectares

	<p>within Wonton Parish as identified within the Open Space Assessment 2022.</p> <p>A high quality, policy compliant, and viable scheme can be delivered that importantly would provide significant level of affordable housing to meet extensive local needs. In the absence of any allocations coming forward through the Local Plan within the village, there is the potential for no affordable housing to be provided in the Parish during the plan period. This site represents a significant opportunity to provide affordable housing.</p> <p>Our client would welcome the opportunity of a meeting with officers to discuss the above in more detail. In the meantime, if there are any questions or clarifications please do not hesitate to contact us.</p>	
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