



WINCHESTER LOCAL PLAN REGULATION 19 CONSULTATION

On behalf of Wates Developments Ltd.

October 2024

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APPENDIX A – VISION DOCUMENT

1.0 INTRODUCTION

- 1.1 Carter Jonas is instructed by Wates Developments Ltd. ('Wates') to respond to the Winchester City Council ('the Council') Local Plan 2020-2040 ('the Local Plan') Regulation 19 consultation.
- 1.2 Wates benefits from a promotion agreement over land on the northern edge of Sutton Scotney ('the site'). The site is identified in the 'Regulation 19' consultation draft of the Local Plan under draft Policy SU01 'Land at Brightlands' and is allocated to deliver 50 to 60 dwellings and an area of informal open space. The draft policy sets out detailed parameters for residential development on site and confirms that the proposed access via the roundabout on Stockbridge Road West is suitable.

Background

Wates Development Ltd.

- 1.3 Wates is an expert in land, planning and residential development throughout Southern England. The business focuses on securing land and delivering planning consents in sustainable locations, in areas of high demand.
- 1.4 As a family-owned business Wates shares a deep sense of responsibility to provide outstanding projects for customers which make a long-lasting difference to the communities in which it works.

Site Context

- 1.5 Land at Brightlands lies to the north of the built-up area of Sutton Scotney. It is located to the north of Stockbridge Road West (A30) and east of the A34 and Southbound Services. The site extends to approximately 5 hectares and is currently largely in arable use, with some outbuildings at the north of the site. There are two residential properties at the centre of the site, but these are outside of the site boundary.
- 1.6 The site has been assessed as part of the Strategic Housing & Economic Land Availability Assessment (SHELAA) 2023 as site reference WO10. The SHELAA confirms that the site is 'deliverable' and 'developable' with no identified environmental, historical, or physical constraints. Furthermore, the assessment indicated that the site has capacity to accommodate 95 dwellings (with an applied density of 30dph).
- 1.7 The site has been promoted as a development opportunity through the emerging Local Plan, with representation being submitted to the Regulation 18 consultation in December 2022. This representation was supported by a Vision Document (included at Appendix A) which confirmed that the site is available and deliverable. The Illustrative Master Plan for the site demonstrates that the site can deliver up to 120 homes. The site capacity has been informed by technical assessment work undertaken to inform the Master Plan with respect to flood risk and drainage, heritage, landscape and visual impact, ecology, highways and access.
- 1.8 Wates has undertaken technical assessment of the environmental and technical features of the site which confirm that there are no significant physical, environmental or technical constraints that would preclude the development of the site for residential use.

Site Vision and Development Benefits

- 1.9 The vision for the land at Brightlands is to create a sustainable new neighbourhood, delivering a mix of attractive new homes in a landscape setting. The proposed development will deliver the following benefits to existing and future residents of Sutton Scotney:
- **New Homes:** Create a residential-led village extension to deliver up to 120 new homes (including 40% (48) affordable homes).
 - **Green Spaces:** Provide new areas of open space including formal and informal recreational space for the residents (including children's play) of the new development and existing residents of Sutton Scotney to enjoy.
 - **Active Travel Opportunities:** Provide a number of initiatives promoting sustainable and active travel opportunities including improvements to the local footpath network increasing connectivity to local shops and green infrastructure.
 - **Biodiversity Enhancements:** Enable new tree and hedgerow planting and deliver net gains in biodiversity (to include in the region of a 34% uplift in Habitat units and 13% in Hedgerow units)
 - **Contributions to the local community** through s106/Community Infrastructure Levy payments.

2.0 GENERAL COMMENTS

- 2.1 Wates is of the opinion that the Local Plan is generally sound, having reviewed its contents and supporting documentation and evidence. There are, however, elements of the Plan that would benefit from some amendments so as to ensure that the Plan conforms to the national policy and that the policies are effective.

'Soundness'

- 2.2 It is understood during Regulation 19 stage of the Local Plan that (in accordance with Paragraph 35 of the National Planning Policy Framework) the Council is specifically seeking comments on whether the plan passes the legal test and is 'sound'. Plans are deemed 'sound' if they are:
- **Positively prepared** - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - **Justified** - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - **Effective** - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - **Consistent with national policy** - enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework and other statements of national planning policy, where relevant.
- 2.3 Our representation hereunder is made with the above context in mind and will reference, where appropriate, where we consider the Local Plan does not meet these tests of soundness.

3.0 VISION FOR THE AREA

Strategic Policy SP1: Vision and Objectives

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

- 3.1 Wates welcomes the aims of policy SP1, and supports the Council in its vision to deliver high quality sustainable and inclusive development.
- 3.2 Wates is particularly pleased to note the reference to partnership working, which will be key if the overall quantum and scale of growth required by the area is to be achieved, especially if that scale is to increase under a new National Planning Policy Framework and as such may well require some flexibility and pragmatism from all parties.

Strategic Policy SP2: Spatial Strategy and Development Principles

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

- 3.3 Wates supports the Council’s overall spatial strategy and acknowledges that the most sustainable location for new development are likely to be those with the most services and facilities. The spatial strategy also recognises the need to support the more rural parts of the plan area, and the need to strike a balance between the social, economic, and environmental needs of the area.
- 3.4 However, and as is set out later in these submissions, the Council must be cognisant of forthcoming changes in national policy and must build in some flexibility to it overall strategy. It is likely that housing needs (and targets) will increase in in the near future, so the Council should include a provision in its early strategic policies for an early plan review. Alternatively, the Council could consider ‘reserve’ sites, or commit to reviewing the development capacity at specific sites, and locations where more development might reasonably be achieved without additional harm (for example, increasing the potential development capacity at Land at Brightlands).

4.0 CARBON NEUTRALITY AND DESIGNING FOR LOW CARBON INFRASTRUCTURE

Strategic Policy CN1: Mitigating and Adapting to Climate Change

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

- 4.1 Wates notes that Strategic Policy CN1 is a ‘gateway’ policy which is supported by later Development Management style (non-strategic) policies of the draft Local Plan. The approach of the Policy is generally sound, and it strikes the right balance between requiring planning applications to demonstrate certain matters and encouraging higher standards where possible.
- 4.2 The Council can, and should, support strategies which seek address climate change, and move away from fossil fuels towards innovative and renewable sources of power, but the influence of a Local Plan on such matters is limited to the local level. The challenge of the climate emergency and the need to reduce our carbon dependence is accepted by the Government.
- 4.3 Chapter 14 in the Framework sets the policy aim of transitioning to a low carbon future. To meet the 2050 target, new homes are already being built to higher energy efficiency standards set out in the 2021 Building Regulations which will deliver a 30% improvement on previous regulations.
- 4.4 The policy runs the risk of becoming outdated as regulations, and national policy shifts, so its role must be kept under review. The Council will need to reflect its desire for partnership working, in this policy and use its agency to identify solutions to the challenges of climate change, and to support development opportunities where it can be demonstrated that climate change adaption and mitigation is being delivered.

Policy CN2: Energy Hierarchy

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	Yes

- 4.5 Wates understands the principles of proposed Policy CN2 but is unclear of its necessity as a standalone policy.

Necessary modification to the Policy

- 4.6 Delete the policy and include its wording in Strategic Policy CN1.

Policy CN3: Energy Efficiency Standards to Reduce Carbon Emissions

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	Yes

- 4.7 Wates acknowledges that in order to meet the Government’s aim of net zero emissions by 2050, there is a need to improve the environmental performance of new residential (but also non-residential) forms of construction. To reach these targets, there is clear benefit in standardising an approach to sustainable design and construction across the UK as part of a collective approach.
- 4.8 We expect further amendments to building regulations and the new Future Homes Standard to be implemented from 2025. These proposed changes will see new homes being built to standards that reduce CO2 emissions by 75% on current standards from 2025 onwards. Furthermore, Homes built under the Future Homes Standard will be ‘zero carbon ready’, which means that in the longer-term, no further retrofit work for energy efficiency will be necessary to enable them to become zero carbon homes as the electricity grid continues to decarbonise.
- 4.9 The Council will need to reflect on the role that building regulations play in the delivery of new development, and whilst national policy does not prevent local authorities from setting higher ambitions, the Plan is still required to demonstrate that its chosen strategy is deliverable and strikes the appropriate balance of social, economic and environment factors in the aim of achieving sustainable development.
- 4.10 Any deviation from national requirements should have been carefully considered in terms of its viability. As far as we can tell from reviewing the Local Plan Viability report, the assumptions regarding additional costs appear reasonable, but will have some effect on deliverability in the short term, and especially on the smaller sites. The Future Homes Hub estimates that the increase in build cost for a full ‘fabric first’ approach, compared with Part L 2021, is circa £19,200 (17%). Compared with the expected 2025 specification it is circa £13,500 (11%) more¹.

Necessary modification to the Policy

- 4.11 The Council will need to keep its viability work under review, to ensure it is robust. Wates recommends that the Council reviews the Future Homes Hub work on this matter: [Ready for Zero - Evidence to inform the 2025 Future Homes Standard -Task Group Report FINAL- 280223- MID RES.pdf \(cdn-website.com\)](#)
- 4.12 The policy will need to be clear that any requirements and encouragements regarding sustainable construction are subject to site specific viability assessments.

¹ [Ready for Zero - Evidence to inform the 2025 Future Homes Standard -Task Group Report FINAL- 280223- MID RES.pdf \(cdn-website.com\)](#)

- 4.13 The Council will also need to carefully consider how it will monitor (and if necessary enforce) a policy which is directed towards attempting to regulate unregulated energy usage.

Policy CN4: Water Efficiency Standards in New Developments

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

- 4.14 Wates understands the water management challenges in the area, and that the South East of England is a water stressed area. Targets of 110l per day, and 105l per day have been achieved in developments and as such the new target of 100l per day is 'sound' so long as it is approached in a collaborative way between applicants, the Council, and Southern Water. Punitive conditions should not be applied, to development consents, which could stifle development, rather a proactive and knowledge sharing approach should be sought which introduces new technologies in a phased manner.

Policy CN8: Embodied Carbon Assessment

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

- 4.15 Wates raises no objection with the principle of proposed Policy CN8, and it recognises the need to manage embodied carbons. However, it is likely that this will have a national standard in development techniques in the short to medium term. It is right that matters of this importance and national application are managed at a national level, but there is not any current national policy or guidance at this time, therefore its explicit inclusion in the Local Plan is questioned.
- 4.16 Wates welcomes the fact that there are no 'targets' introduced in the proposed policy, but it does question how the Council proposes to assess the feasibility of demolition or re-use of various buildings. Also, Wates suggests that the operational needs of buildings and businesses, should be considered more clearly in this policy, and if a building is no longer fit for its intended purpose, then this should weigh in favour of its removal.

5.0 HIGH QUALITY WELL-DESIGNED PLACES AND LIVING WELL

Strategic Policy D1: High Quality, Well Designed and Inclusive Places

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

5.1 Wates supports the principles set out in proposed Strategic Policy D1. The Council's approach to high quality, well designed, places chimes with Wates own approach to promoting sites for development.

5.2 Wates recognises the importance of quality design and place making, indeed the Framework contains an entire chapter (12) on the subject. Paragraph 126 of the Framework explains that:

“The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.”

5.3 Proposed Strategic Policy D1 follows the principles set out in the Framework and adds some local context, it is therefore a ‘sound’ policy.

5.4 An element of design should continue to be reserved for Neighbourhood level and where positive and aiding in the delivery of development in the production of site-specific design codes. This is because design is often reflective of site-specific circumstances. As advocated by paragraph 129 of the Framework, design codes can sometimes be prepared by landowners and developers.

5.5 The Vision Document for Land at Brightlands shows how a well set out and accessible development could be achieved. The development would be sustainable and inclusive, and this could be achieved with a greater site capacity of around 120 new dwellings.

Strategic Policy D4: Design Principles for Market Towns and Rural Villages

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	No
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

5.6 Wates is unclear of the specific value of proposed Policy D4. Whilst the intensions of the policy are clear, and Wates strongly supports well designed new places, the need to have a set of development management policies which follow proposed Strategic Policy D1, is not justified.

- 5.7 Proposed policies D2, D3 and D4 all follow a similar structure which all relate back to proposed Strategic Policy D1. There is little additional detail, and no more direct guidance for the decision maker in the non-strategic policies, and in essence each policy is setting out that design should respond to its surrounds and context. Having additional repetitive policies is unhelpful for effective and efficient decision making.

Necessary modification to the Policy

- 5.8 Delete the policy and include its wording in Strategic Policy D1.

6.0 SUSTAINABLE TRANSPORT AND ACTIVE TRAVEL

Strategic Policy T1: Sustainable and Active Transport and Travel

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

- 6.1 Wates broadly supports this policy.
- 6.2 The policy for sustainable travel and connectivity, should refer to the overall spatial strategy which includes both locating and promoting development that can reduce the need to travel and promote a genuine choice of transport modes, whilst also investing appropriately in supporting infrastructure.
- 6.3 Wates considers that a successful strategy of co-locating new homes and jobs can make a significant contribution to producing a sustainable and active transport network, reducing the need to travel long distances (and promoting the idea of a 20-minute neighbourhood).
- 6.4 Whilst reducing the need to travel by vehicle makes a significant contribution to creating an active transport network, the Local Plan will need to take account of the comparatively poorer transport connections in the more rural areas of Winchester – as recognised by paragraph 105 of the Framework.
- 6.5 Accordingly, a key part of transitioning towards a sustainable transport network, whilst maintaining sustainable growth, is locating development adjacent to existing or proposed major routes that can accommodate sustainable forms of travel – including cycle lanes, bus routes or by train and where possible, co-locating major housing and employment-generating development.
- 6.6 The spatial strategy in the Local Plan supports active travel, and Wates is committed to supporting active travel choices on sites which it promotes.

Policy T3: Enabling Sustainable Travel Modes of Transport and the Design and Layout of Parking for New Developments

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

- 6.7 Wates supports this policy, and it chimes with its own design and layout philosophies. The ‘hierarchy’ of streets is a well understood principle, and developers / developments are becoming better at providing for active travel and promoting pedestrian and cycle safety.
- 6.8 The need to promote public transport options as early as possible in new developments is also understood and supported.

7.0 BIODIVERSITY AND THE NATURAL ENVIRONMENT

Policy NE3: Open Space, Sport and Recreation

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

- 7.1 Wates recognises and supports the inclusion of policy guidance on the amount of open space, and sports/recreation facilities with new development.
- 7.2 Wates notes that the tables set out in support of proposed Policy NE3 are very similar to those of the extant plan, and Policy CP7. This policy is well understood and had been delivered in development across Winchester.
- 7.3 Land at Brightlands has capacity to exceed the open space guidance, even with more houses being included, when development is consented.

Policy NE5: Biodiversity

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

- 7.4 The concept of Biodiversity Net Gain (BNG) is becoming better understood and since the enactment of the Environment Act 2021, most developments are attuned to demonstrating a 10% net gain as required by that Act from 2024.
- 7.5 This does not mean that the Plan should not seek to encourage developments to secure BNG in excess of the 10% set in the Environmental Act – which of course will be the legal minimum. However, accordingly, any encouragement to demonstrate a net gain in excess of 10% should be subject to a viability assessment. For guidance purposes, biodiversity units generally cost £25,000-£35,000 but the number of dwellings these cater for is very scheme dependent. Government credits are much more expensive again.
- 7.6 Moreover, this cost, along with others concerning sustainable design will need to be monitored on a site-by-site basis to ensure the Council’s overall strategy remains deliverable across the plan period. The Council may need to be open to negotiation on such matters to ensure its strategy is delivered.
- 7.7 PPG Paragraph 022 (Reference ID: 8-022-20190721) advises that biodiversity net gain can be achieved on-site, off-site or through a combination of both on-site and off-site measures. National guidance does not explicitly state the percentage split between such provision, but Paragraph 023 (Reference ID: 8-023-20190721) confirms that such gains can be delivered entirely on-site or by using off-site gains where necessary.
- 7.8 Land at Brightlands will be able to demonstrate an appropriate net gain in biodiversity.

Policy NE11: Open Space Provision for New Developments

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

- 7.9 Wates understands the principles of proposed Policy NE11 but is unclear of its necessity as a standalone policy.

Necessary modification to the Policy

- 7.10 Delete the policy and include its wording in Strategic Policy NE3.

8.0 HOMES FOR ALL

Strategic Policy H1: Housing Provision

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

- 8.1 Wates is broadly supportive of the housing requirements set out under Strategic Policy H1, including the provision of a buffer to accommodate the needs from the neighbouring authorities. However, it is not clear how this approach to identifying need complies with the guidance for calculating housing needs. The basis for calculating need is to use the submission year of the plan as the starting point and to calculate need and a trajectory forward over the plan period. Previous targets and delivery performance, under current policy and guidance is not necessarily relevant, other than to provide context.
- 8.2 Winchester Strategic Housing Market Assessment Update ('SHMA') (published in July 2024) supports the case for the housing requirement, as set out in Policy H1, to be retained or potentially increased and the case for proposed allocations to be retained.
- 8.3 The SHMA highlights that the housing delivery rates over the last five years have significantly exceeded the Local Plan average requirement of 625 dwellings per annum. However, it is also noted that while affordable housing delivery has significantly improved, there does not appear to have been an immediate, or significant, impact on improving market affordability in Winchester District.
- 8.4 The need to maintain the housing delivery rates and increase the delivery of affordable housing is identified in the SHMA. This reinforces the need for medium sized sites such as Land at Brightlands to be allocated in the emerging Local Plan as medium sized sites are typically delivered quickly and can offer affordable housing.
- 8.5 The urgent need for housing is brought into sharp focus with Secretary of State's written ministerial statement entitled "Building the homes we need" ('WMS') which sets out the measures to address the housing crisis. It should also be noted that the WMS has material weight.
- 8.6 At the time of drafting this representation, the Government has signalled its firm intention to revise the National Planning Policy Framework ('Framework') in relation to housing land supply and delivery and to this end the Government has published a draft revised Framework (dated 30th July 2024) which is was subject to an eight week period of consultation up to 24th September.
- 8.7 Part of the Government's proposed changes include the revisions to the way the housing need is calculated through the introduction of revisions to the Standard Method of calculating the need. If the proposed method for calculating housing need is implemented, as currently proposed, the annualised housing target for Winchester would **increase from 676 dwellings per annum to 1099 dwellings per annum**.
- 8.8 At the heart of the draft guidance is the continued support for sustainable development in locations which are accessible and well served by social infrastructure. Moreover, the draft Framework signals the determination to boost deliverable housing land supply with a revised standard methodology for calculating housing need and a return to mandatory housing targets.

8.9 The draft Framework shows the likely direction of travel for Government policy relating to development growth and infrastructure provision, application determination, and plan-making in England. If the revised standard method is adopted, this could result in significant uplift in the annualised housing requirement in Winchester District.

Necessary modification to the Policy

8.10 Given the growing mandate for the standard method to be used as the basis for determining local authorities’ housing requirements in all circumstances, the Council must commit to an early review of the Local Plan to enable sufficient housing to come forward to meet local targets.

8.11 There are sites, such as Land at Brightlands, which could have their allocated capacity increased to provide a buffer to meet the expected rise in housing targets. The site has capacity to deliver almost double its current allocation which would assist in meeting an increase in targets. .

Strategic Policy H2: Housing Phasing and Supply

Legally compliant	No	Positively prepared	No
Sound	No	Justified	No
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

8.12 Wates is concerned that draft Policy H2 fails to present a positive response to the urgent need for housing in England and limits the opportunity to boost the housing land supply in the District.

8.13 Furthermore, it is noted that the draft policy is inconsistent with Paragraph 60 of the Framework which states that:

*“To support the Government’s objective of significantly boosting the supply homes, it is important that a **sufficient amount and variety of land** can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.” (our emphasis)*

8.14 Section 6 of the Housing Topic Paper (July 2024), published in support of the emerging Local Plan, sets out the detailed justification for the phasing policy and how it intends to operate. The reasons sets out by the Council are summarised below:

- Given the high level of commitments and existing Local Plan allocations, the only realistic ‘lever’ available to promote more housing in the later part of the Plan period, so as to level out housing delivery, is to use phasing to hold back new Local Plan allocations.
- A large part of the housing commitments are greenfield sites of various types and sizes, as illustrated by the AMR information on housing commitments and recent brownfield / greenfield development. Reflecting on the emphasis on prioritising brownfield sites, the Regulation 18 Plan sought to hold back new greenfield allocations
- Phasing new greenfield sites to hold them back until after 2030 coincides with Government requirements for water companies to reduce nutrient discharges (which is a constraint and cost within Winchester District).

- It has become evident that the capacity of the Scottish and Southern Electricity Networks (SSEN) electricity grid poses a potential issue. Planning for long-term infrastructure needs is important to ensure that the community is resilient to future challenges and capable of accommodating growth without compromising quality of life.

8.15 Against the above points, Wates is of the following view:

- The Council's attempt to create an artificial housing trajectory in order to 'level out housing delivery' fails to account for the variable nature of the housing market in the District. In the absence of a buoyant market, there is a risk of insufficient completions being achieved in the plan period. This in turn is likely to increase the affordability ratio in the District. Furthermore, the proposed policy does not account for site-specific circumstances which change over time and makes the phasing strategy less robust.
- As set out in the WMS, brownfield development alone will not be enough to meet the existing unmet housing and commercial needs. The proposed principle of prioritising the delivery of development on brownfield sites during the early phases of the plan period is likely to deter and delay sustainable development in the District. It is considered that the most strategic way to meet the housing demands of the District is to undertake a 'housing first approach', where high quality housing in available and deliverable locations are encouraged. Furthermore, brownfield redevelopment is expensive and can lead to viability challenges, where the Council will have to inevitably make concessions on matters such as affordable housing provision or other infrastructure impacts.
- The proposed upgrades to wastewater treatment works presents only part of the solution in reducing nutrient discharge. To drive forward nutrient neutrality in the District, localised mitigation solution must be encouraged to create wider sustainability benefits. The land at Brightlands presents an opportunity to reduce the nutrient runoff into the Test by ceasing intensive agricultural activities on the land and the use of associated fertilisers. Thereby, making nutrient neutrality achievable. While Wates notes that current environmental challenges need to be addressed pragmatically, it considers that there is no merit in delaying the delivery of allocated greenfield sites where it can be demonstrated that appropriate forms of mitigation can be employed on a site.
- The concerns cited with regard to the capacity of the electricity grid should not be presented as a barrier in the delivery of homes on allocated greenfield sites. A balanced approach should be undertaken to overcome the competing crisis of housing and energy. The Government has been steering reforms to address the energy crisis with the Connections Actions Plan being published at the end of 2023 outlining the need to slim down queue of viable progressing projects aligned to the country's strategic need. The Council must engage with energy providers and regulators and seek to secure wider and coordinated enabling works instead of delaying the vital delivery of homes.

8.16 Council's proposed phasing to new greenfield housing sites allocated in the emerging Plan is contrary to the Framework and will likely create a barrier in sufficient amount and variety of land to come forward and meet the critical need for housing.

Necessary modification to the Policy

8.17 As set out above, it is considered that draft Policy H2 does not meet the test of soundness and is in direct conflict with the Government's ambition to boost the supply of homes as set out the WMS and

draft Framework. Therefore, it is recommended the draft Policy is removed from the emerging Local Plan.

Strategic Policy H3: Spatial Housing Distribution

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	No
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	Yes

- 8.18 Wates broadly supports the spatial strategy, as set out in these submissions, but believes that there is clearly greater capacity for development in Winchester, and in Sutton Scotney.

Necessary modification to the Policy

- 8.19 The Council should, in light of the increased housing needs identified in these submissions, and foreshadowed in the WMS, adjust the housing targets and distribution in proposed Strategy Policy H3.
- 8.20 There is greater capacity for development at Land at Brightlands.

Policy H5: Meeting Housing Needs

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

- 8.21 Wates notes that ‘needs’ work which underpins this policy as presented in “*Winchester Strategic Housing Market Assessment (SHMA)*,” and supports the delivery of homes for all parts of the community.
- 8.22 We note the need for accessible and adaptable homes and confirm that these can be provided at Land at Brightlands.
- 8.23 The Policy is ‘sound,’ but as with other proposed non-strategic policies of the Local Plan the Council will need to ensure its application is cautious to ensure it does not create an undue burden on the providers of accommodation for older people, to ensure timely delivery.

Policy H6: Affordable Housing

Legally compliant	Yes	Positively prepared	Yes
Sound	Yes	Justified	Yes

Compliant with the duty to cooperate	Yes	Effective	Yes
		Compliant with national policy	Yes

- 8.24 Wates notes that ‘needs’ work which underpins this policy as presented in “*Winchester Strategic Housing Market Assessment and 2024 Update*,” and supports the delivery of homes for people who cannot access the housing market.
- 8.25 The Local Plan viability work suggests that the provision of Affordable Housing at 40% of residential development is achievable, and therefore Wates supports this too. the caveats around previously developed land, and the need to mitigate the impact of additional phosphates on the River Itchen SAC are also noted.
- 8.26 Wates expects that Land at Brightlands can provide up to 40% affordable homes including 35% as low cost home ownership, and 65% as Social Rent or Affordable Rent. Affordable housing will be evenly distributed within the site and designed to a high quality, so as to be indistinguishable from other development. The delivery of affordable housing, including mix and tenure, will be secured through a s106 agreement.

9.0 INTERMEDIATE RURAL SETTLEMENTS SUTTON SCOTNEY

Sutton Scotney

9.1 Wates reads paragraph 14.178 of the Local Plan with some disappointment:

Sutton Scotney is within the group of 'intermediate' settlements, with an aim to identify new sites for 50-60 dwellings. There are currently foul drainage issues but these are due to be resolved by Southern Water in March 2025. It is expected that there is capacity for the development of about 80 dwellings in Sutton Scotney

9.2 First, sites of 50-60 seem to be quite limiting on settlements the size – and with the level of services and facilities – of Sutton Scotney. Sites of around 100-120 dwellings have greater potential to deliver Affordable Housing, and other community benefits because the viability of development at this scale is likely to be much greater. Moreover, with the potential shortfall in the housing target that is identified in these submissions, seeking some more houses at “intermediate settlements” might become necessary.

9.3 Second, it is suggested that development of Land at Brightlands can also assist in the improvement of foul drainage - albeit these issues are to be resolved by Southern Water in early 2025.ds. The scale of the site, and potential development, has the scope to include a solution to sewerage issues and Wates continues to work with its consultants and other relevant authorities in progressing matters.

9.4 At the very least, the figure for a settlement should be described as a minimum. In this way it would be in conformity with the strategic policies of the Local Plan, and with the Framework, which seeks to boost significantly the supply of new homes.

9.5 Given that the plan period is proposed to last for 20 years – and even if the plan is reviewed in this time – it is still somewhat draconian, and not justified, to effectively place a moratorium on development at Sutton Scotney based on a technical issue where solutions can be found.

Settlement boundaries

9.6 Wates' opinion is that settlement boundaries are an arbitrary and blunt instrument, which do not have regard to the contribution that some open spaces within settlements make to the character and appearance of those settlements. In terms of impact on amenity and the local landscape it might be preferable to locate new homes in edge of village locations which technically, might sit outside the arbitrary boundaries. It is therefore suggested that the philosophy and operation of settlement boundaries is carefully considered in the Council's final drafting exercises before the Local Plan is published to ensure that they are still generally fit for purpose. Wates submits that the Councils will need to reflect on the operation of settlement boundaries and how they comply with the Planning Practice Guidance as follows:

“The nature of rural housing needs can be reflected in the spatial strategy set out in relevant policies, including in the housing requirement figures for any designated rural areas. A wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlement will need to be supported by robust evidence of their appropriateness.”

Paragraph: 009 Reference ID: 67-009-20190722

Policy SU01: ‘Land at Brightlands’

Legally compliant	Yes	Positively prepared	Yes
Sound	No	Justified	Yes
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	Yes

9.7 Wates strongly supports this proposed allocation in the Local Plan. The relevant parts of the draft policy are considered below.

9.8 Land at Brightlands, Sutton Scotney as shown on the Policies Map, is allocated for about 50-60 dwellings and an area of informal open space. Planning permission will be granted provided that details accord with the Development Plan and meet the following specific requirements:

	Proposed Policy Wording	Wates’ Response
Nature & Phasing of Development		
i.	A masterplan establishing principles for the disposition of housing, open space, access and archaeological considerations should be submitted. Any applications for all or part of the site should demonstrate how the proposal will accord with these principles and achieve the form of development intended by this allocation as a whole;	Agreed. Design work has been undertaken in respect of the site and its constraints and an initial masterplan was submitted to the Council as part of representations made in the Regulation 18 Consultation. Any future application will be also supported by an Illustrative Masterplan.
ii.	The development is phased for the latter part of the Local Plan period and permission for housing development will not be granted before 2030;	As set out in the previous section, the proposed phasing of the allocated greenfield housing sites will not positively contribute in bringing forward sufficient and variety of land for housing. The need for ‘levelling-out’ housing delivery during the Plan period is not justified and does not account for variable nature of the housing market. Again, we urge the Council to adopt a ‘housing first approach’ where the delivery of high quality housing is prioritised on available and deliverable land. Furthermore, Wates considers that there is no merit in delaying the delivery of sites where it can be demonstrated that appropriate forms of mitigation can be adopted to overcome technical requirements.
iii.	Provide an overall site plan indicating the general siting of development, open space, landscaping, above grounds SUDS system to mitigate the risk of siltation and access points that minimises wider landscape impacts. Any applications for all or part of the site should demonstrate how the proposal	Agreed. Any future application will be supported by a Landscape Parameters Plan.

	will accord with these principles and achieve the form of development intended by this allocation as a whole;	
Access		
iv.	Provide safe vehicle, pedestrian and cycle access links to the site and across the A30 in accordance with Policy T3;	Agreed. A Transport Assessment will be submitted in support of any future application.
v.	Vehicular access should be located off the existing roundabout to the southeast of the site minimising the removal of hedgerows and ensuring good visibility for vehicles entering and exiting the development;	Agreed. A General Arrangement Plan will be submitted detailing the proposed access via the existing roundabout.
vi.	A new pedestrian crossing to be located at the A30 linking the site to the village of Sutton Scotney;	Agreed. The details of the proposed pedestrian crossing will be submitted as part of any future application.
vii.	The proposals include direct, safe and lit, where appropriate, active travel links as part of a strategy that minimises car journeys from the development by providing opportunities for walking, cycling and public transport that is connected to the surrounding area/ PROW;	Agreed. However, we note that this criterion is essentially a duplication of the requirements set out in draft Policy T3 'Enabling Sustainable Travel Modes of Transport and the Design and Layout of Parking for New Developments'.
viii.	Provide safe and convenient pedestrian access on to the adjacent PROW;	Agreed.
Archaeological constraints		
ix.	Prior to the design process, archaeological assessment and investigations will be required to assess the sites archaeological potential;	Agreed. An initial desktop assessment was undertaken following communication from the Council's Strategic Planning Officer. This concluded that there was nothing credible to suggest the presence of any remains of such a level of significance that would preclude the deliverability of the site for development. A further Archaeological Desk Based Assessment will be prepared in support of the application.
x.	Such investigations should comprise geophysical survey and evaluation trenching, the results of which should inform the design process for the proposed development at the site and appropriate mitigation options, in accordance with policy HE2, HE5 & HE7;	Agreed. A WSI for archaeological investigation shall be submitted for approval.
Environmental		
xi.	A Hydrogeological Risk Assessment should be undertaken to determine ground	An assessment of ground conditions and groundwater levels within the red line

	conditions and groundwater levels in proximity to the site, and to identify whether the proposed development will impact on groundwater, either from subsurface construction or from changes to surface water drainage;	boundary of the site will be undertaken and details submitted as part of an application.
xii.	A site-specific Flood Risk Assessment and drainage strategy will need to be prepared and agreed that demonstrates how development will be safe over its lifetime, taking climate change and the vulnerability of the developments users into account, and ensure that flood risk is not increased elsewhere as a result of the development;	Agreed.
xiii.	A Construction Environmental Management Plan that includes details of how silt will be managed during construction and post occupation;	Agreed.
xiv.	Provide useable and accessible on-site open space in accordance with the approach set out in policy NE3;	Agreed.
xv.	Retain and reinforce landscaping buffers on the east, west and south boundaries of the site except where their removal is necessary for access;	Agreed.
xvi.	Undertake a noise assessment and provide appropriate mitigation to prevent excessive disturbance to the planned residential development from the nearby service station and major roads, in accordance with policy D7;	Agreed.
Other infrastructure		
xvii.	Occupation of development will be phased to align with and drain to the new sewerage pipeline between Sutton Scotney and South Wonston, the delivery of sewerage infrastructure, in consultation with the service provider. Layout of the development must be planned to ensure future access to existing sewerage infrastructure for maintenance and upsizing purposes; and	The most recent correspondence from Southern Water (July 2022) demonstrates that the proposed development can be accommodated prior to any upgrades. Furthermore, Wates has consulted the Environmental Agency to establish that in line with the hierarchy of connection, an onsite package treatment could be supported. Thus, Wates considers this Grampian condition unnecessary and should be omitted from the draft policy.
xviii.	Contribute to infrastructure needed to make the development acceptable in planning terms.	Wates will work with the Council to define an appropriate S106 agreement to secure provision of affordable housing, off site transport improvements and other contributions.

- 9.9 The draft policy sets out the threshold for development as 50 to 60 dwellings on the site. However, the technical works undertaken to support the emerging Master Plan, clearly establishes that the site can accommodate up to 120 dwellings. Furthermore, the SHELAA published in 2023, identifies the capacity of the site to accommodate 95 dwellings.
- 9.10 Paragraph 123 of the Framework directs planning policies to promote an effective use of land in meeting the need for homes and other uses. The same provisions are included the Council's in proposed Policy D6. Limiting the quantum of development to simply 60 dwellings on the site appears to be in direct conflict with this provision of the Framework, and the Council's own plan. Wates' is of the opinion that housing development should be provided at a target responding to the site and its context, at up to 120 dwellings. Not allocating the site in a way which makes best use of its capacity, risks the Council needing to find more greenfield sites in the rural parts of the plan area to meet the identified need.

Necessary modification to the Policy

- 9.11 The proposed policy must allow for greater quantum of development on the site and the threshold for development should be increased to at least 120 dwellings to allow for efficient use of land and viability of the scheme.
- 9.12 As detailed above, criterion (ii) proposing the development to be phased during the latter part of the Plan period is in against the provisions of the Framework and the Government's ambition to boost housing supply.
- 9.13 As evidenced in the Drainage Note prepared by Ramboll, Southern Water has confirmed that proposed development can be accommodated prior to any upgrades. Thus, Criterion (xvii) is considered unnecessary and should be omitted.

10.0 CONCLUSION

- 10.1 Wates welcomes the opportunity to comment of the emerging Winchester City Local Plan and strongly supports the continued allocation of the Land at Brightlands. However, Wates has made few recommendations within this representation that will assist in the timely delivery of the allocated strategic site.
- 10.2 Most of the Local Plan appears to be sound, but there are some matters which require attention. Chief amongst these matters in the proposed phasing of allocated greenfield housing sites. There are other matters of detail, as set out in this submission which Council will need to review to ensure that its plan is ultimately 'sound' and suitable for examination and adoption.
- 10.3 Wates confirms the site is suitable, available and deliverable for development. In summary, based upon the identified opportunities and constraints set out in the Vision Document, the development of the site has the potential to:
- New Homes: Create a residential-led village extension to deliver up to 120 new homes (including 40% (48) affordable homes).
 - Green Spaces: Provide new areas of open space including formal and informal recreational space for the residents (including children's play) of the new development and existing residents of Sutton Scotney to enjoy.
 - Active Travel Opportunities: Provide a number of initiatives promoting sustainable and active travel opportunities including improvements to the local footpath network increasing connectivity to local shops and green infrastructure.
 - Biodiversity Enhancements: Enable new tree and hedgerow planting and deliver net gains in biodiversity.
- 10.4 Wates' primary concern is related to draft Policy H2 proposing the phasing of the new greenfield sites, which is entirely unjustified.

11.0 PARTICIPATION AT THE ORAL PART OF THE EXAMINATION

- 11.1 Carter Jonas, on behalf of Wates, confirms that it does wish to take part in the oral part of the Local Plan examination. This is to be able to fully explain the concerns about the policy drafting and to answer questions that the Inspector might have.
- 11.2 We also consider it important to share the vision for the Land at Brightlands and provide confidence as to their deliverability.

APPENDIX A – VISION DOCUMENT



Wates

Land at Brightlands, Sutton Scotney

Vision Document

April 2021



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Wates

Carter Jonas

Wates Developments Ltd: Land at Brightlands, Sutton Scotney, Hampshire.

Version: 1
 Version Date: April 2021
 Status: Final
 This document has been prepared and checked in accordance with ISO 9001:2000.

Land at Brightlands, Sutton Scotney will be a sustainable new neighbourhood, delivering a mix of attractive new homes in a landscape setting.

The Site will promote health and well-being through the creation of a connected network of informal and formal open spaces for existing and new residents to enjoy, with new habitats created for a net gain in biodiversity.

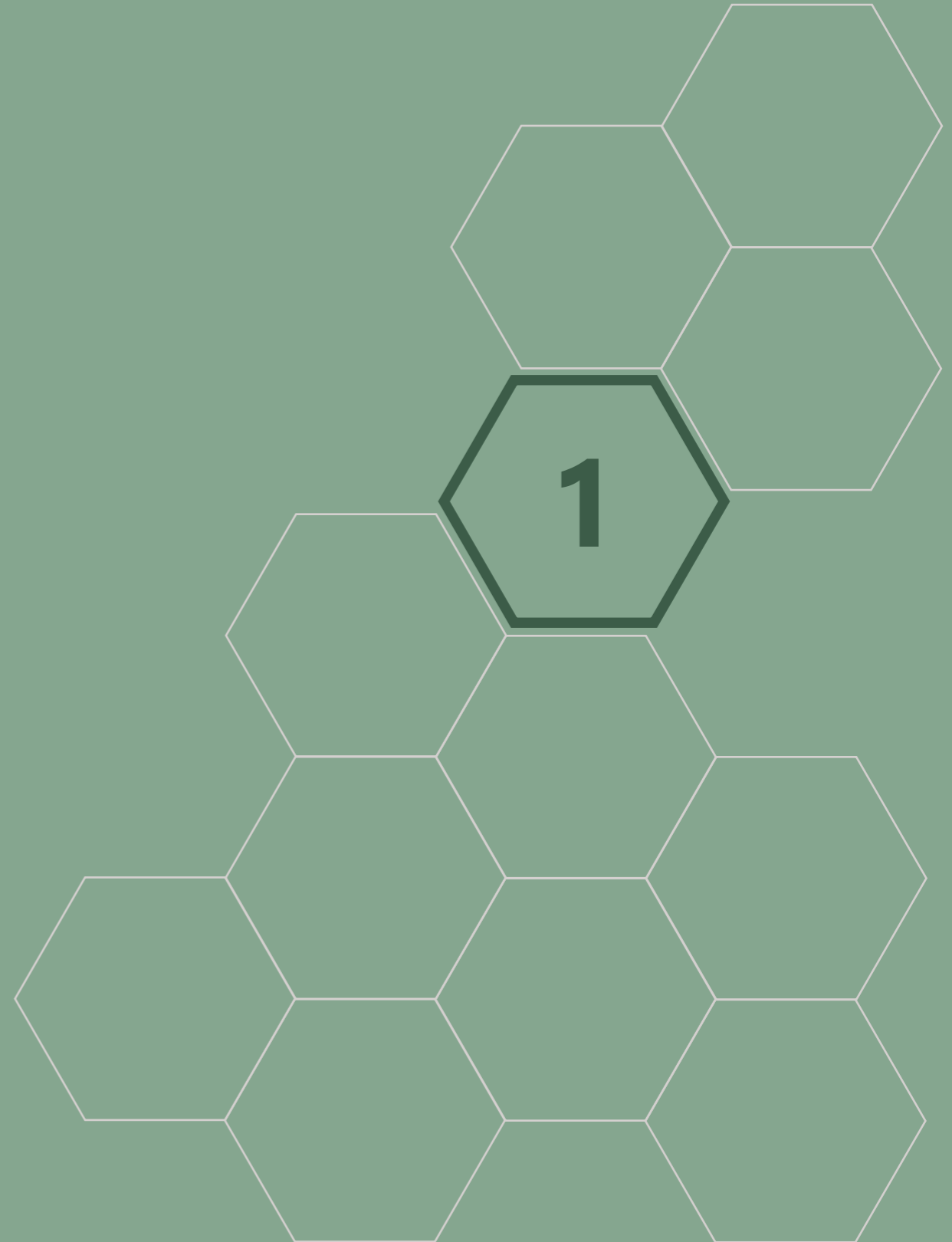
The development will deliver new tree planting to complement retained existing trees and hedgerows. The development will be designed to be accessible by foot and by bike and connect into existing infrastructure. The development will make financial contributions to existing infrastructure in the vicinity of the Site.



Fig 01: View of the Site and Sutton Scotney

1.0 Introduction

- 1.1 Executive Summary
- 1.2 Purpose of the Document
- 1.3 Document Structure
- 1.4 WCC 9 Key Issues
- 1.5 Wates Developments
- 1.6 Wates in Winchester



Introduction

1.1 Executive Summary

This Vision Document sets out the aspirations for residential-led development on Land at Brightlands, Sutton Scotney, where Wates Developments Ltd (Wates) is responsible for development proposals.

This document demonstrates the deliverability of new sustainable development on the site, which is comprehensively masterplanned to accommodate approximately 120 new homes.

The site is approximately 5 hectares in extent and is currently largely in arable use, with some outbuildings at the north of the site.

Project Team

Wates and its project team continues to progress the development proposals for site. The project team comprises:

Carter Jonas

Town Planning & Masterplanning



Transport



Landscape



Ecology



Flood Risk and Drainage



Heritage



Noise, Utilities & Services

The team of specialist consultants has enabled Wates to create a Vision for the site and an illustrative Concept Masterplan which demonstrates how the site could be developed to create high-quality sustainable residential development on the edge of Sutton Scotney.

The site is being promoted as a single opportunity with a comprehensive masterplan, supported by the above technical team.

1.2 Document structure

This document has been structured to clearly demonstrate how the Site at Brightlands can be brought forward for residential development in line with the key issues and priorities from the Winchester City Council Local Plan Strategic Issues & Priorities Consultation.

1.3 Purpose of Document

The principal purpose of this document is to inform the emerging Winchester Local Plan by setting out the case for the allocation of Land at Brightlands as a Strategic Development Area and to confirm that the site is available and deliverable.

In summary, based upon the identified opportunities and constraints set out in this document, the development of the site has the potential to:



120 homes

Create a residential-led village extension to deliver a mix of around 120 new homes in a sustainable location (including affordable homes)



Biodiversity

Create areas that can foster new habitats and deliver net gains in biodiversity



1.73 Ha of open space

For formal and informal recreational space for the residents of the new development and existing residents of Sutton Scotney to enjoy



Carbon Neutrality

Reduce operational energy use by incorporating renewable energy supply such as photovoltaic (solar) panels



New vegetation

Facilitate planting of native vegetation including new trees and hedgerows



Sustainable Travel

Opportunities for electric vehicle charging points and a car club located on site

Fig 02: Key benefits of the Site infographic

1.4 WCC 9 Key Issues

This proposal has been led by the 9 Key Areas of Focus identified within the 'Your Place Your Plan' Issues and Priorities Consultation. These proposals positively respond to all 9 key areas.

-  **1. Carbon Neutrality**
-  **2. Biodiversity and the Natural Environment**
-  **3. Promoting Sustainable Transport and Active Travel**
-  **4. Conserving and Enhancing the Historic Environment**
-  **5. Creating a Vibrant Economy**
-  **6. Living Well**
-  **7. Low Carbon Infrastructure**
-  **8. Ensuring Delivery**
-  **9. Homes for All**

Throughout the document, where one or more of these key issues is identified and/or addressed, the corresponding icon is shown at the top of the page.



Fig 03: WCC's 9 Key Issues

1.5 Wates Developments

Wates Developments is an expert in land, planning and residential development throughout Southern England. The business focuses on securing land and delivering planning consents in sustainable town and country locations, in areas of high demand. The business partners with a number of national housebuilders in joint ventures to deliver much-needed housing developments.

As a family owned business Wates shares a deep sense of responsibility to provide outstanding projects for customers which make a long-lasting difference to the communities in which it works.

Everything we do is guided by our purpose of working together to inspire better ways of creating the places, communities, and businesses of tomorrow. Our goals are to be more sustainable, trusted and progressive, and our people are driven by our behaviours of **'we care'**, **'we are fair'**, and **'we look for a better way'**.

At Wates we are committed to reducing our industry's environmental impact and our five-year Strategy sets out this commitment and how we can be better custodians of the environment and protect our earth's precious resources and habitats for future generations.



Fig 04: Wates Social Credentials

Carbon Neutrality



Ensuring Delivery



Low Carbon Infrastructure



1.6 Wates in Winchester

Wates has been appointed by Winchester Council to deliver 76 high-quality affordable homes in Winnall, Winchester.

This forms part of the city council's plans to regenerate the area and build attractive new homes that reflect the local area and integrate with the surrounding landscape.

Measures to **minimise carbon emissions**, promote renewable energy and manage water effectively will be integral parts of the scheme in order to align with Winchester City Council's aim for the District to be carbon neutral by 2030. The proposed new units are designed to be highly sustainable (AECB Standard) and provide for a high quality living environment for new and existing residents.

The scheme has also been designed to offer enhancements to local green spaces. This will include the a new community park which will include seating, areas to socialise, a play area for younger children and a food growing beds.

Wates Residential and Winchester City Council have made a joint pledge to **provide additional education, employment and training opportunities for local people** as part of their investment in the local area. This will include providing a boost to the Winchester economy by employing local businesses and creating job opportunities for local people.

Cabinet Member for Housing and Asset Management, Cllr Kelsie Learney, said:

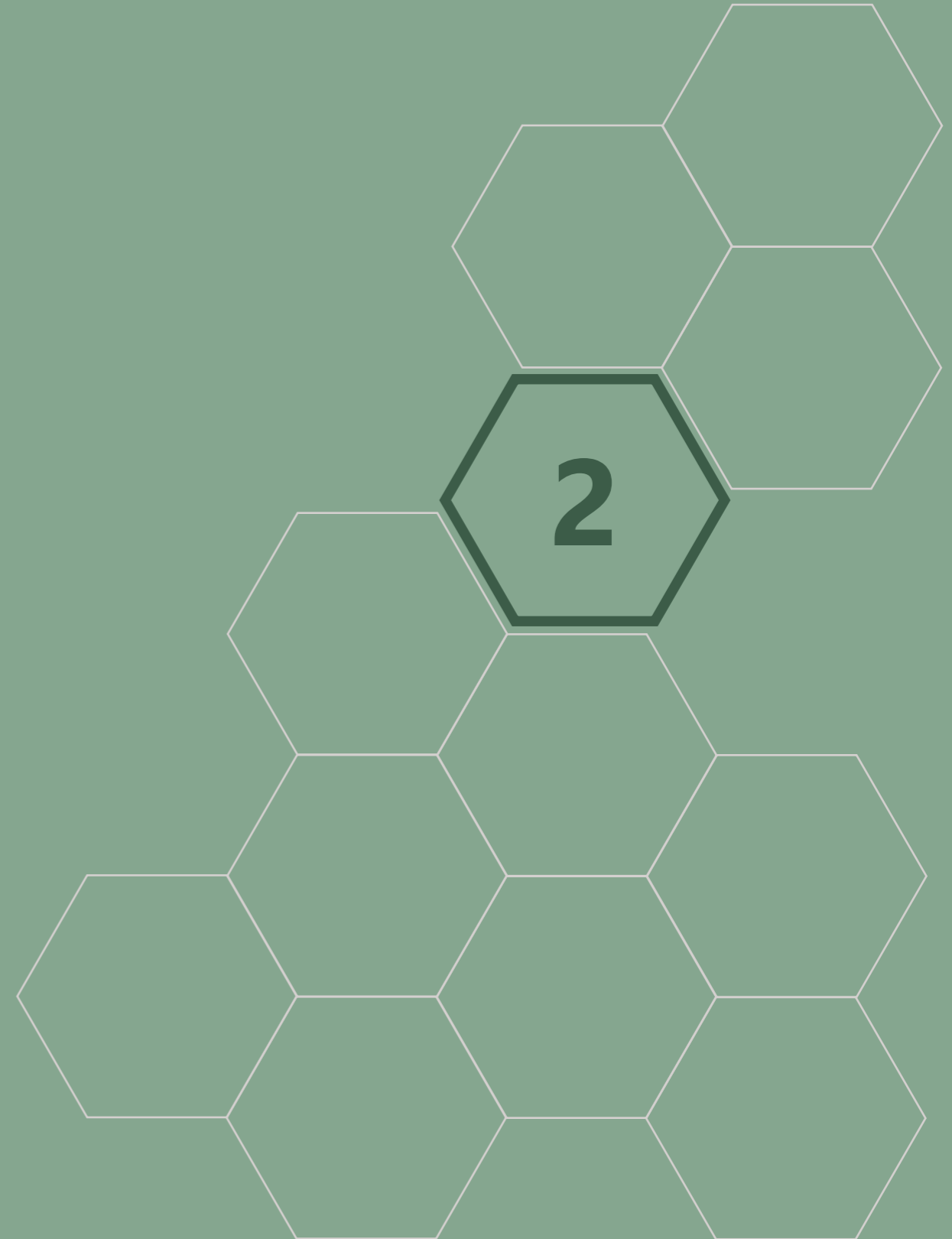
"Working with Wates is a great fit for the city council in helping us achieve our housing, environmental and employment goals. These 76 new homes in the Winchester district will help ensure more of our residents can afford to live in well-designed, energy efficient homes. We look forward to work starting in summer 2021."



Fig 05: Views of the proposed development at Winnall (Wates)

2.0 Context

- 2.1 The Site
- 2.2 Site Photographs
- 2.3 Community Facilities & Accessibility



Context

2.1 The Site

Sutton Scotney is a village located to the north of Winchester, Hampshire. The development site lies to the north of the built up area of Sutton Scotney, and is located to the north of Stockbridge Road West (A30), and east of the A34 and Southbound Roadchef Services. Sutton Scotney is extremely well served by the road network providing easy and quick access into the key employment hubs of Winchester, Southampton, Andover and Basingstoke.

The site is approximately 5 hectares in extent and is currently largely in arable use, with some outbuildings at the north of the site. There are two residential properties at the centre of the site, but these are outside of the site boundary. The site is bounded by mature hedgerows on all sides, although the hedgerows to the west (adjacent to Sutton Scotney Services) and to the east (along the disused railway line) are much thicker than normal hedgerows having been augmented with additional trees and shrubs. These hedgerows will be maintained and enhanced as part of the proposals.

South of the A30 is housing at Sutton Park Road and Saddlers Close, and the centre of Sutton Scotney lies to the south east of the site on Oxford Road. To the east of the site is a service station and convenience store, and to the west is Sutton Scotney Services. North of the site is a horse paddock with a residential property in its north east corner, and to the north of this field is the residential development at Wessex Park. A public footpath runs along the western edge of the site.

The principal purpose of this document is to inform the emerging Winchester Local Plan by setting out the case for the allocation of Land at Brightlands as a Strategic Development Area and to confirm that the site is available and deliverable.

Land at Brightlands is considered to be a sustainable location for new development that is able to connect into and enhance existing infrastructure, as part of a sustainable new residential development. The site has the potential to deliver around 120 new homes which would make a significant contribution to the identified local housing need.

Wates welcomes the Strategic Housing and Employment Land Availability Assessment 2020 assessment of the site which identifies that the site is suitable, available and achievable for housing development. This site is the only site located within Wonston in the SHELAA 2020 where there were no identified environmental or historical constraints.

Therefore, in order to meet the pressing local need, development of this site is considered necessary.

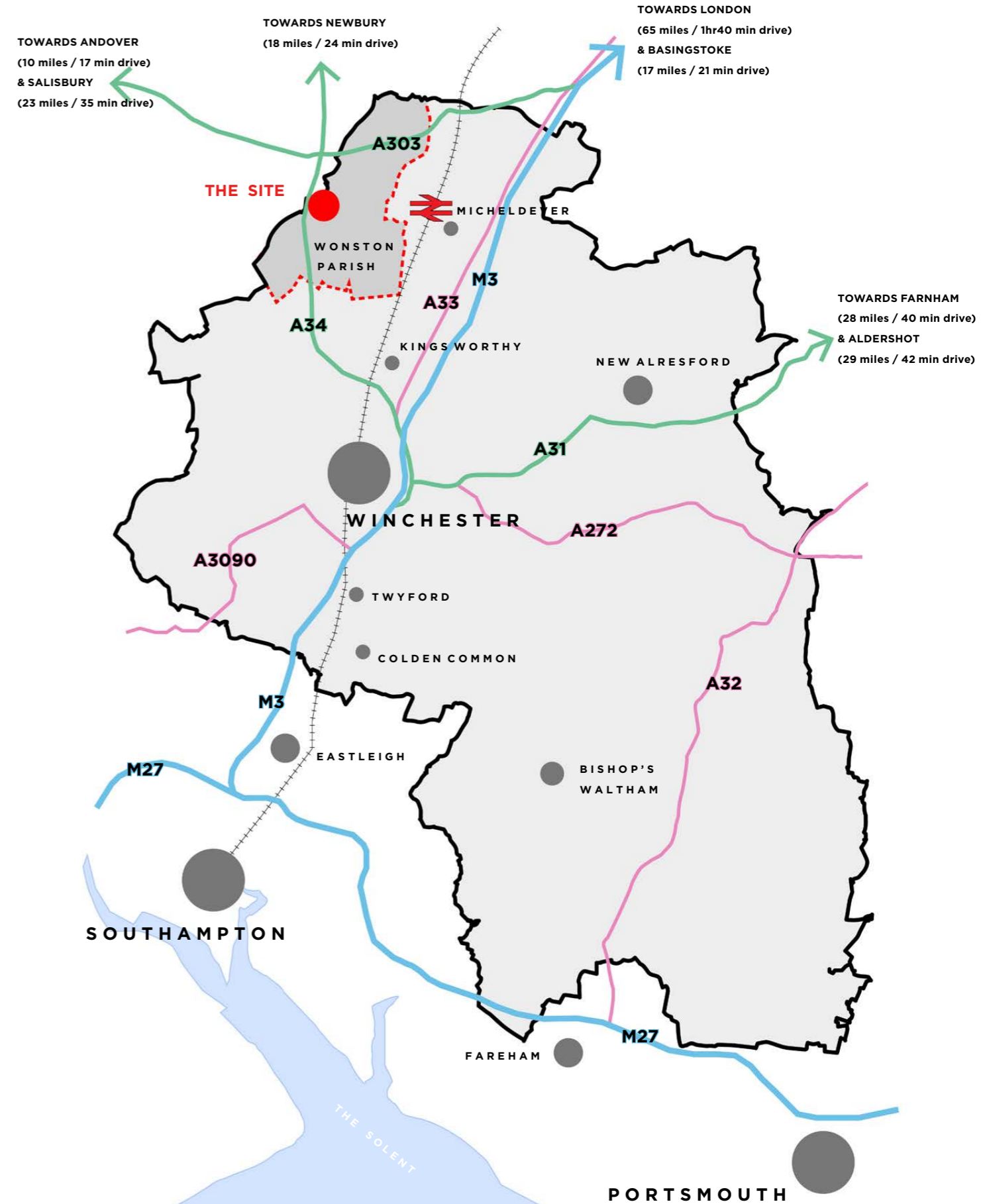


Fig 06: Site Location in Winchester District

2.2 Site Photographs



1. View across the Site looking north east from the existing access road to Brightlands and Brightlands Cottage
2. Existing mature vegetation along the Site's boundary with the A30
3. View across the Site looking west towards the Site's western boundary
4. Existing request stop for buses on the A30 adjacent to the Site's southern boundary



5. View east along the A30, with the Site on the left
6. View north along the existing access road for Brightlands and Brightlands Cottage
7. View across the Site from the south west corner, looking north east and showing existing structures on Site
8. View towards Brightlands Cottage from the Site's western boundary
9. View west along the A30 showing existing pedestrian infrastructure on the southern side of the road, and mature vegetation on the Site boundary.

Fig 07: Site photographs 1-4

Fig 08: Site photographs 5-9



2.3 Community Facilities & Accessibility

There are a number of local services and amenities within walking distance of the site, which make it a sustainable location for new development. These existing services and facilities include:

1. The Coach and Horses Public House
2. Gratton General Practice Surgery
3. Victoria Hall
4. Egg Day Nursery and Child Care
5. Little Oaks Pre-School & Day Care
6. Sutton Scotney Fire Station
7. Naomi House and Jacks Place Hospice for Children and Young Adults
8. Sutton Manor Nursing Home
9. Dever Stores & Post Office
10. Texaco Petrol Filling Station / MOT Repairs / Used Car Dealership
11. The Gratton Recreation Ground
12. Children's Play Area
13. Allotments
14. A34 Services (southbound and northbound)

The closest primary school is in South Wonston.

The 86-bus route operates from Winchester to the outskirts of Basingstoke, via Sutton Scotney. The bus stop is located at the Coach and Horses Public House.

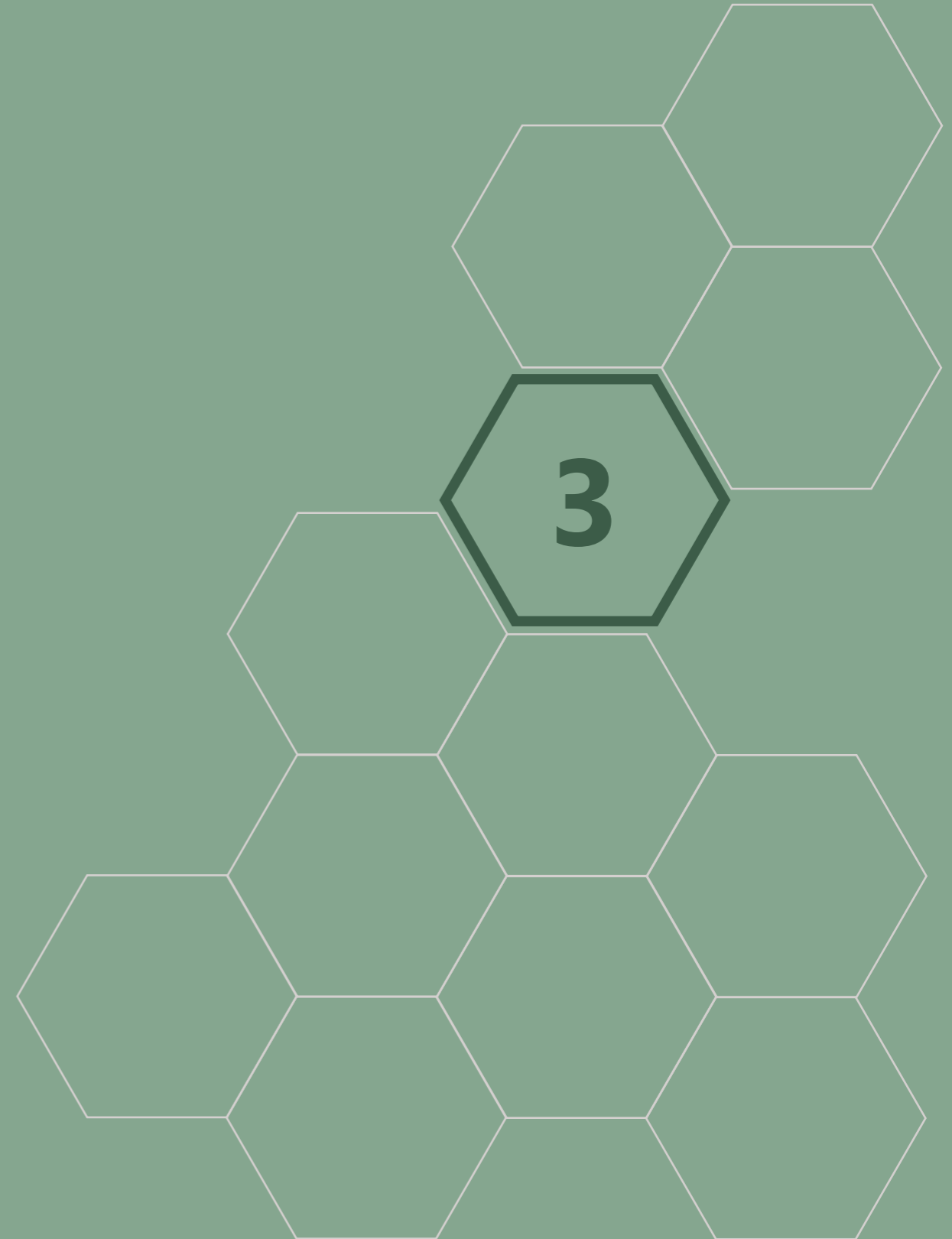


- Site boundary (5.276 Ha)
- Sutton Scotney Conservation Area
- Bus stop
- Public right of way

Fig 09: Community facilities plan

3.0 Site Delivery

- 3.1 Summary of Technical Reports
- 3.2 Considerations Plan



Site Delivery

3.1 Summary of Technical Reports

Landscape & Visual

- The site is not within any national or local landscape designations and there are no such designations close to the site
- There is a visual influences of the houses to the south of the site as well as the A30 and A34
- The site is visually contained by existing mature hedgerows on all sides

A landscape review has been undertaken by SLR Consulting and the assessment principles used follows the guidance in the Landscape Institute’s “Guidelines on Landscape and Visual Impact Assessment”, 3rd Edition, (GLVIA3, 2013).

The site is typical of the Test Valley character area in that it is a small scale, enclosed arable field in the valley floor. The site is of low landscape and visual value. There is the visual influence of the housing development at Sutton Park Road and Saddlers Close to the south of the site as well as the A30 and A34.

The existing hedgerows and tree belts which are to be maintained are very robust and consequently there is little need for additional mitigation.

Historic Environment

- The development would not be visible in relation to any of the listed buildings within Sutton Scotney
- The A30 and housing development at Sutton Park Road and Saddlers Close forms a barrier between the site and Sutton Scotney.
- The sensitive design of the site and the existing screening will ensure that Sutton Scotney will be allowed to group whilst retaining its individual identity and rural character.

Turley Heritage have been appointed to provide a Built Heritage Appraisal and provide advice on the potential built heritage implications for residential development at the site.

The proposed development is located approximately 40m north of the Sutton Scotney Conservation Area, which includes a number of listed buildings within its boundary.

It is anticipated that the development would not be visible in relation to any of the listed buildings within Sutton Scotney. This is due to the existing screening afforded by the changing topography, intervening built form and mature vegetation. The A30 also forms a barrier between the site and Sutton Scotney, further separating it from the conservation area and listed buildings.

Promoting Sustainable Transport and Active Travel



Flood Risk & Drainage

- Sustainable drainage solutions (SuDS) will be implemented on the site
- A diversity of SuDS will be implemented to maximise the benefits to water quality and biodiversity and will be sized to manage the 1 in 100 year rainfall event including a 40% allowance for the anticipated future effects of climate change

Sustainable drainage solutions (SuDS) will be implemented on the site to manage increases in surface water runoff as a result of the proposed development, improve the water quality particularly in runoff from trafficked areas, and to create spaces for people to enjoy and nature to thrive. Surface water runoff from the impermeable areas of the site will be collected via permeable paving, swales and point drainage systems, and conveyed to above and below ground storage solutions which may include permeable sub-bases, cellular storage, ponds and pocket wetlands.

A diversity of SuDS will be implemented to maximise the benefits in terms of land take, water quality and biodiversity, and will be sized to manage the 1 in 100 year rainfall event including for a 40% allowance for the anticipated future effects of climate change.

Foul water generated by the site will be conveyed via a below ground piped network to a site. The package treatment plant will serve the entire proposed development. Consultation is underway with package treatment plant suppliers in order to select a solution for the site which optimises the standard of treatment provided and includes for the removal of nitrates from the treated effluent.

Conserving and Enhancing the Historic Environment



Biodiversity and the Natural Environment



Sustainable Development

- The site will reduce operational energy use by incorporating renewable energy supply such as including photovoltaic (solar) panels on the dwellings.
- The site offers a number of initiatives promoting sustainable travel for the occupants of Sutton Scotney
- The site is located in close proximity to a number of local services and facilities and the proposed development could support rural vitality
- The site will deliver a Biodiversity -gain and is nutrient neutral.

Land at Brightlands, Sutton Scotney will be a sustainable neighbourhood which has been designed around the Climate Emergency and the Council’s 9 Key Areas of Focus. The proposals are committed to integrating the principle of Carbon Neutrality into the scheme and welcome discussions with the Council in order to maximise these opportunities.



Ecology & Nitrate Neutrality

- The existing arable cultivation on the land is suppressing the ecological interest on the site.
- The proposals present a significant opportunity for ecological habitat enhancement and creation and exceed biodiversity net gain requirements.
- The existing arable land use is associated with a high nitrate current use value. The cessation of this activity in combination with an onsite package treatment plant will be effective in ensuring the proposals are nitrate neutral.



Fig 10: Dark Green Fritillary on Musk Thistle (EPR Ecology)

As the site is currently under a modern arable farming regime that is biodiversity-poor, a significant Biodiversity Net Gain is achievable from habitat creation and enhancement of existing habitats in conjunction with the proposed development if the site is allocated.

Preliminary calculations using Defra's Version 2.0 Biodiversity Metric indicate that an uplift in Habitats Units in the region of 34% and an uplift in Hedgerow Units in the Region of 13% should be achievable. This will be delivered through a variety of interventions including creation of significant areas of species and wildflower-rich lowland calcareous (chalk) grassland and ponds - both of which are 'Priority' habitats for nature conservation under Section 41 of the Natural Environment and Rural Communities Act 2006, as well as being sought by Local Biodiversity Action Plans for Winchester City Council and Hampshire County Council.

Surveys for protected species would be carried out as normal prior to any planning application, but at this stage it is not predicted that there are any insurmountable constraints to the proposed development. It is anticipated that species specific enhancement measures will be secured as a result of the proposed development

Preliminary assessments and discussions have found that an onsite package treatment plant will be effective in removing a significant proportion of nitrogen pollution from any wastewater produced by the proposed development. Additionally, as the site itself is currently used for intensive arable agriculture. The cessation of this agricultural activity and its associated fertiliser use will cause a drop in nutrient runoff into the Test that will further help to offset the proposals and make nutrient neutrality achievable.



Fig 11: Species Rich Grassland & Wildlife Pond (EPR Ecology)

Meeting Local Housing Need

- Wonston Parish Council has identified a need for affordable housing in the Parish and has made contact with the landowners this site to help to find a solution to meeting these affordable housing needs.
- A Wonston Parish Housing Report (6th January 2021) identified that there were a total of 33 active applications with a qualifying local connection to the Parish.
- The current Winchester Local Plan Part 1 (2013) and Local Plan Part 2 (2017) did not support Wonston Parish council in meeting their local housing need and address rural unaffordability
- Since 2016 only 2 affordable housing units have been delivered in Sutton Scotney.
- The proposals will allow local people to remain in an area where they have an existing network of family, work and social activity.

Housing affordability in Winchester, particularly in the rural areas is a real problem. The area around Sutton Scotney is a clear example of this, and the challenge is greater here than the authority average. In January 2021, Wonston Parish Council reported that there is the need for affordable housing in the Parish, there are 33 active housing applications with a qualifying local connection to the Parish. In response to this, the Parish have identified this site as suitable for development written to the landowners to help find a solution to meeting these housing needs.

Winchester's Part 1 & Part 2 Local Plans identified housing allocations for a number of Market Towns and Rural Areas. Only one (New Alresford) of which supported new housing in a 'Northern Parish' - the others being located in Winchester and surrounding Parish or the 'Southern Parishes'.

In Sutton Scotney more specifically, since 2016, just one planning consent (reference 16/00999/FUL at the Old Station Yard, Oxford Road) has included any level of Affordable housing provision. This provision is of only two affordable homes, and 7% of the total (27 dwellings). Two affordable dwellings in five years is less than minor.



Fig 12: Wates Developments Joint-Ventures

These proposals constitute a proportionate development on the edge of Sutton Scotney and have been designed with sustainability and the climate emergency at the forefront. The site would help improve the availability of affordable housing in an area where there is an identified need and historic underdelivering whilst also supporting the existing services and facilities. Delivering new houses in Sutton Scotney is essential to ensure that local people have the opportunity to remain in an area where they have an existing network of family, work and social activity.



Highways and Sustainable Transport

- A pre-app with Hampshire County Council, the Highway Authority, provided positive feedback in relation to the development proposals from a highways and transportation perspective.
- The site is within a comfortable and walking and cycle distance to the existing services and facilities in Sutton Scotney as well as the existing public transport network.
- The proposals come forward with a host of initiatives to increase the sustainable travel opportunities and discourage private car usage for new and existing residents.

The site is located to the north of Stockbridge Road West (A30), and east of the A34 and Sutton Scotney service station. The centre of Sutton Scotney is approximately 400m 'as the crow flies' to the south of the site, within a comfortable walk and cycle distance.

There are a number of local amenities within Sutton Scotney, which are accessible by more active and sustainable travel options, including a convenience store, a doctor's surgery, two day nurseries and a number of recreational/leisure facilities. The site is located close to a network of good sustainable transport links including Public Rights of Way (PRoW), pedestrian and cycle routes. These provide access to existing bus stops along Oxford Road, which benefit from regular services between Winchester and Whitechurch.

Hampshire County Council as the Highway Authority have provided positive feedback in relation to the development proposals from a highways and transportation perspective.

Connectivity

The development will be integrated into the existing sustainable transport network. To achieve this the proposals includes a new 2 metre footway on the northern side of Stockbridge Road West which extends westwards up to the existing PRoW; and eastwards to connect to the existing footway beyond the former railway bridge abutment.

A pedestrian dropped kerb crossing point is also proposed to the west of the site to allow pedestrians to cross Stockbridge Road West, this will provide a link between the two PRoW. The internal layout will connect to existing PRoW which runs along the western boundary of the site, for the benefit of existing users and new communities.

Opportunities exist for the proposed footway on the north side of Stockbridge Road West (along with the existing footway on the south side) to be widened and upgraded to provide a footway/cycleway.

Integration of the site with existing walking and cycling routes and bus stops will ensure genuine active and sustainable travel opportunities are available to future residents to access everyday amenities in Sutton Scotney.



Fig 13: Example of electric car charging points

Site Access

The proposed vehicular access to the site, will be designed to provide safe and secure access for all users and to ensure they cater for the level of traffic associated with the development, as well as future growth. The proposals include modifications to the existing A30 / Oxford Road roundabout which allows an additional arm to be provided to serve the development site.

The proposed modifications include minor re-alignment of all arms in order to accommodate the additional fourth arm and positioned to ensure appropriate sightlines are achieved. The layout also includes provision for pedestrians to cross at all arms of the roundabout, providing access to the village facilities on the southern side of Stockbridge Road West.



Fig 14: View of existing roundabout between the A30 and Oxford Road

Traffic Impact

This modest level of traffic impact is unlikely to result in a significant impact on the operation of the local transport networks. The traffic impact of the proposals will be assessed fully through the planning application process. Sustainable Travel

The proposals include a number of initiatives in order to encourage sustainable travel, these include:

- Car club membership and a car club vehicle on-site
- Electric vehicle charging facilities (including for e-bike)
- High quality secure cycle parking facilities
- Vouchers that can be used towards cycling equipment and repairs
- Travel vouchers for use on public transport
- High speed broadband and home office provision
- A central secure location for home deliveries, including chilled and frozen food
- Community car share database

To further support the sustainable travel, a bespoke community bus service could be provided, which could adapt depending on demand and provide links to Winchester town and railway station, schools and local employment centres in addition to the existing Community Transport Service and Winchester Dial-a-Ride.

Car Club Benefits

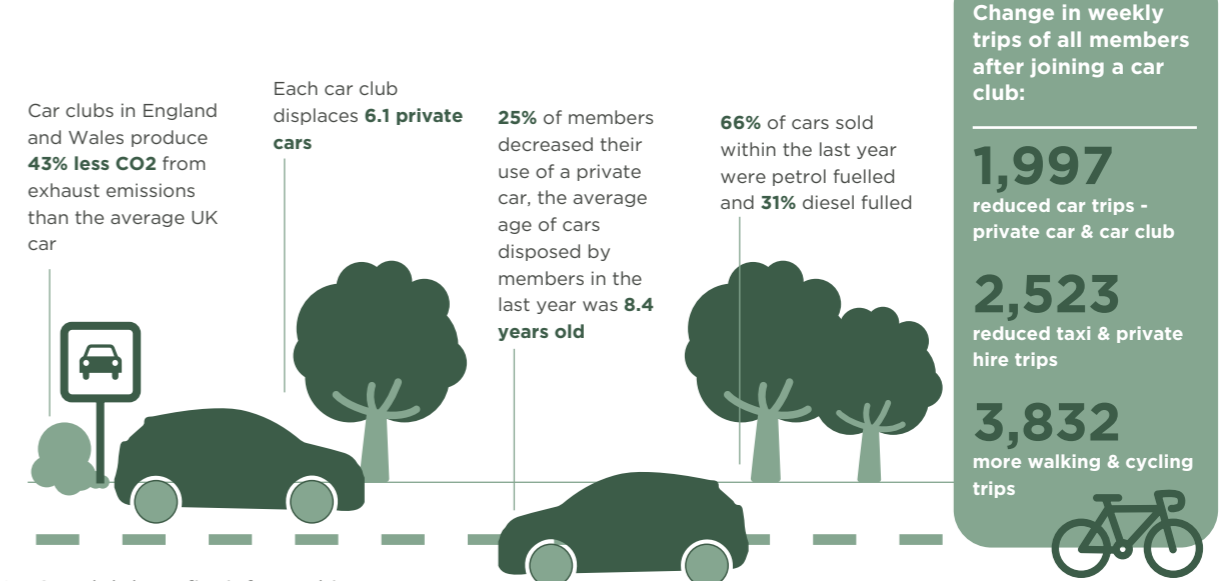


Fig 15: Car club benefits infographic



3.2 Considerations Plan

The plan opposite illustrates the key characteristics identified through the contextual and technical analysis of the Site explained in earlier sections of the document.

LEGEND

Existing Features






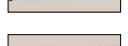







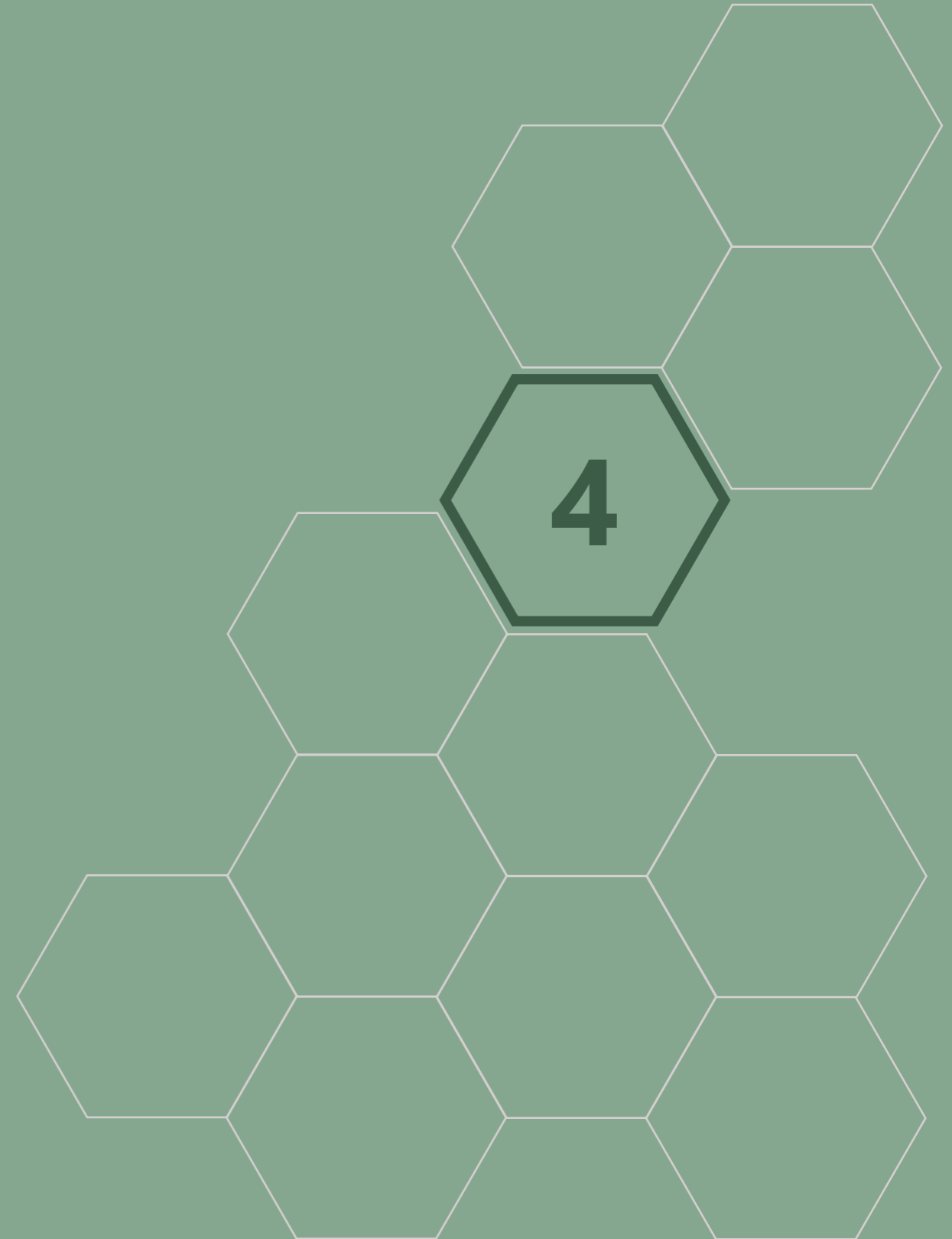
-  Site boundary (5.276 Ha)
-  Existing trees
-  Hedgerow
-  Potential site access
-  Overhead LV cable
-  Landfall
-  Public right of way
-  Sensitive boundary to existing dwellings
-  Existing access to dwellings from A30
-  Access to existing dwellings
-  Surface water flooding: medium risk
-  Surface water flooding: low risk
-  Existing drain



Fig 16: Technical considerations plan

4.0 Design

- 4.1 Concept Plan
- 4.2 Key Principles
- 4.3 Visualisation of Proposals
- 4.4 Summary



Homes for All 

Biodiversity and the Natural Environment 
 Promoting Sustainable Transport and Active Travel 

Ensuring Delivery 
 Living Well 

4.1 Concept Plan

The high level concept plan illustrates potential residential development zones, with their positioning defined by the open space, access and circulation strategies.

LEGEND

-  Site boundary (5.28 Ha)
-  Site access from Stockbridge Road W (A30)
-  Proposed altered roundabout between A30 and Oxford Road
-  Development areas: high density
-  Development areas: medium density
-  Development areas: low density
-  Potential link through to public right of way
-  Potential building frontage location
-  Existing trees
-  Proposed trees / planting
-  New buffer planting to screen long views from the north to the site
-  Retained existing access to dwellings from A30
-  Access to existing dwellings
-  Potential areas of open space
-  Potential location of surface water attenuation feature
-  Potential location of children's play area
-  Proposed pedestrian crossing point
-  Potential feature building



Fig 17: High level concept plan

Homes for All 

Biodiversity and the Natural Environment 
 Promoting Sustainable Transport and Active Travel 

Ensuring Delivery 
 Living Well 

4.2 Key Principles

1. Access to the Site achieved by reconfiguring the existing roundabout between the A30 and Oxford Road
2. Enclosing the Site and reducing the visual impact of development with a new planted buffer along the northern boundary
3. Creation of a network of connected open spaces, providing opportunities for biodiversity, recreation and play
4. A hierarchy of streets, with a key central route and smaller informal streets serving new dwellings
5. Opportunities for areas of surface water attenuation on lower lying areas of the Site
6. Potential links in to the improved public right of way to the west of the Site to provide new walking routes through the Site and out to the countryside
7. Gateway buildings at the Site entrance
8. Marker buildings in key locations to help with legibility
9. Planting and vegetation around the existing Brightlands and Brightlands Cottage to protect amenity
10. New open space/wildflower planting areas/allotments accessible to the new and existing community
11. New vegetation along the Site's southern boundary to retain the character and protect existing planting along the A30
12. New pedestrian crossing to facilitate walking in to Sutton Scotney



Fig 18: Concept Plan: key principles

4.3 Visualisation of Proposals



Fig 19: Visualisation of proposals

4.4 Summary

This document has demonstrated that a high quality new residential extension can be delivered on the site at Brightlands, Sutton Scotney. The list on the opposite page demonstrates how the proposals accord with the key issues identified by Winchester City Council in the Local Plan Strategic Issues & Priorities Consultation.

In summary, the development has the potential to:

- Create a residential-led village extension to deliver around **120 new homes** in a **sustainable location** (including affordable homes);
- Provide new areas of **open space** including formal and **informal recreational space** for the residents of the new development and existing residents of Sutton Scotney to enjoy;
- Enable **new tree** and hedgerow planting;
- Opportunities for electric vehicle charging points and a car club vehicle located on site;
- Deliver **net gains in biodiversity**; and
- **Contribute financially to new infrastructure** through s106/Community Infrastructure Levy payments.



Fig 20: WCC's 9 key issues

Appendices

Appendix A: List of Figures



Appendix A: List of Figures

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Wates 

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