

Sir/Madam

1.0 I am one of 5 residents living at the centre of SU01 Brightlands. My wife and I have lived here for 33 years and our neighbours for more than 20 years.

1.1 The first time we knew about the proposed development of Brightlands was when the Regulation 19 Local Plan was published on 19<sup>th</sup> July 2024 although, to be fair, I had 9 days advance notice when the Parish Council were notified by the LPA on 10<sup>th</sup> July 2024.

1.2 I am feeling rather intimidated by the fact that I am challenging the LPA who have spent hundreds of thousands of pounds on consultants and King's Counsel when I have no qualifications or methodology tools to support my arguments. However, I am hoping that you will kindly regard me as having equal standing as I am able to offer a different aspect as someone who knows, 100%, the difficulties of making Brightlands fit into the Local Plan through my 'lived experience'. I will be light on 'technicalities' but heavy on 'practicalities' which, when developers have been and gone, are all that residents new and old have to deal with.

1.3 I apologise now if I make comments against the incorrect Policy references as some of them do overlap. *References to different policies only relate to Policy SU01 and not to those policies relating to the overall Plan.*

1.4 As stated in the Regulation19 Local Plan the Plan is meant to be read in its entirety and I hope that this representation will be treated in the same way.

1.5 The very first thing I must address is NIMBY ism.

1.6 The facts are that I am now 77 years of age and so the likelihood of me still being alive if the site is brought forward in 2030 or later is fairly remote. If, left on her own, my wife will not be here as the property is too big for her to manage.

1.7 My concerns are for the village as a whole, both for current residents and those who will undoubtedly arrive in the future. I am fully invested in village and community life having raised £20,000 for the purchase and maintenance of 5 defibrillators, one for each village in the parish. I ensure their availability 24/7 365 days of the year. I am a Trustee of the Victoria Hall and I designed and maintain their website. I am a member of Wonston Parish Council.

1.8 I appreciate that this is probably tedious detail to you but I feel it necessary that you appreciate my devotion to Sutton Scotney and the wider Wonston Parish.

## 2.0 For and Against Brightlands

### For

- The land is available
- The land is relatively flat
- The land will accommodate up to 120 dwellings

### Against

- The land is separated from the rest of the village by the A30 trunk road
- Road safety issues are involved in vehicles exiting the site and pedestrians and cyclists crossing the A30
- The site is 'landlocked'. There is no way out or off site without crossing the A30. The PROW on the western edge goes nowhere
- Development will create a village of two halves
- Community cohesion and social inclusion will be compromised by the A30
- Loss of Grade 3 agricultural land
- Loss of biodiversity and habitat
- Noise pollution
- Air pollution
- Increased carbon emissions due to motor vehicle ownership on site
- Increased risk of contributing to village flooding

2.1 Twenty years ago, Brightlands, as a potential building site, would probably have scored slightly more highly than today as there were fewer concerns about climate change, healthy living, sustainable transport, etc. However, the situation has changed dramatically and, quite rightly, these concerns along with many more now feature in all aspects of a Local Plan. Hopefully, I will convince you by the end of my representation that Brightlands is totally unsuitable for the building of new homes either in this Plan or any *future Plan*.

2.2 Why was Brightlands chosen at the last minute for inclusion in the Local Plan? It was included to demonstrate co-operation with neighbouring authorities regarding 'unmet demand'. The two authorities being Portsmouth City Council and Havant Borough Council. This was made clear by the LPA's Strategic Planning Officer on 19<sup>th</sup> July 2024 at the presentation of the Plan to the Scrutiny Committee of Winchester City Council. A further 100 homes at Wickham were also included. It ticked a box to prove one of the required tests of 'soundness' but, in the case of Brightlands, it wasn't on the merits of the site itself neither had residents been consulted.

2.3 During the course of my representation I hope to demonstrate serious issues in relation to failure to consult, air quality, noise pollution, road safety, climate change, sustainable transport, social integration and cohesion, loss of agricultural land, flooding, biodiversity, habitat loss, and lack of infrastructure.

2.4 Dealing with the site itself (SHELAA Reference SU01 Page 493) if looking at the map on the right 'Wider Context' it immediately becomes obvious how large the site is compared to the whole village. If developed, it will increase

the size of the village by about 25% - out of all proportion to the size of the existing village. The indicative number of homes is given at 50-60 but, of course, this site would take 120 homes and any developer will apply for this number at planning application stage. With a current target of 40% affordable homes and the future target of 50% affordable homes the increased number will be essential in terms of a profitable development.

2.5 Residents know that the indicative number of homes at 50-60 is just Phase 1 of a bigger plan as the evidence of intent for a much greater number has become obvious since the Parish Council acquired a document from Carter Jonas on behalf of Wates Construction. (See below)

2.6 There is a total confusion of numbers in various documents actually in the Local plan documentation

- Regulation 19 Local Plan Page 493 (50-60 dwellings)
- Sutton Scotney Site Selection Page 12 (95 dwellings)
- Development Strategy & Site Selection Page 32 6.48 (up to an additional 120 dwellings)

This point was raised at the Full Council Extraordinary Meeting held on 28<sup>th</sup> August 2024 <https://youtu.be/QLCQnjKQj8g?si=PmH3F6DhjRbmLNvw&t=7881> when officers clearly stated that up to 140 homes (yet another figure) would be 'out of character for the area'.

2.7 Now I refer to a document not in the evidence base but which the LPA have had in their possession since December 2022 in response to Regulation 18 consultations and which they have withheld from residents and the Parish Council right up to present time. We were only aware of its existence on 2<sup>nd</sup> September 2024 when Carter Jonas supplied it to the Parish Council as a result of the Council requesting their attendance at a public meeting in Sutton Scotney on 4<sup>th</sup> September. They supplied the report in lieu of attending. It is entitled 'Response on Behalf of Wates Developments Ltd'. *I will attach a copy of this report as Appendix A.*

- Page 13 paragraph 5.8 (50-60 limiting, 100 dwellings or greater have greater potential to deliver Affordable Housing)
- Page 16 paragraphs 7.2 and 7.3 (120 homes in both)

2.8 The LPA may argue that it is not relevant as it was part of the Regulation 18 consultation and does not form part of the Regulation 19 Local Plan but it actually does, as parts of this document have been 'copied and pasted' into the Regulation 19 Local Plan which I feel makes it relevant. An example follows:

Response on Behalf of Wates Development Page 4

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

2.2 There are two residential properties at the centre of the site, but these

are outside of the site boundary. The site is bounded by 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.

Regulation 19 Local Plan page 494

*14.180 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 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.*

2.9 Describing the two residential properties as being 'at the centre of the site but outside of the site boundary' rather glosses over the difficulties which both residents and developers will experience. The considerable impact on existing homes has not been considered neither have the occupiers ever been consulted by owners, land agents, planners or developers.

2.10 The situation with the owners of the two properties is extremely serious in as much as we both have right of way over the driveway down to the A30 and are jointly responsible for the maintenance of 75% of the driveway, but we don't own it. This can clearly be seen on the site plan. Our properties will be 'islands' connected to the 'mainland' at the pleasure of the developer. He may use the drive as he wishes including using it for moving heavy machinery and construction traffic on and off the site whilst we remain responsible for its maintenance and repair. We will be at the mercy of the developer for vehicle access and the uninterrupted supply of our essential services such as water, electricity, broadband and septic tank soakaways which cross over and under the fields from different directions.

2.11 When I challenged the lack of Regulation 18 public consultation for Brightlands at the Cabinet Committee meeting of Winchester City Council on 19<sup>th</sup> August 2024 the Strategic Planning Manager stated that the law did not require land allocations to be published at that stage and that the Regulation 19 public consultation complied with the law. Whilst this may be true, it begs the question why all other land allocations were published in the Regulation 18 Draft Report inviting responses from the public when residents of Sutton Scotney had no such opportunity. At no stage have residents on Brightlands or the wider village **ever** been consulted pre-Regulation 19 which makes a mockery of the 'Your Place, Your Plan' title of this Plan. For Sutton Scotney it should be renamed 'Your Place, **Our** Plan'.

### **3.0 I now deal with various aspects of Policy SU01**

*Access iv. / 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;*

3.1 (Also Policy T4) This will require the removal of the whole hedgerow from the roundabout west at least as far as the driveway to the existing properties. This is due to the curve on the A30 approaching the roundabout and because drivers will be sitting quite low in cars waiting to exit the site onto the roundabout. The existing grass verge will need to be hard landscaped to stop grass and vegetation growing 2 to 3 feet high as happens now otherwise visibility will be zero. While the south side of Stockbridge Road East and West is maintained by Winchester City Council the north side is the responsibility of Hampshire County Council which mows a single strip of grass not more frequently than twice per year. We regularly mow the verge either side of our drive to give us a clear view of approaching traffic. Removal of approximately 100m x 4m of established hedgerow will impact biodiversity and habitat.

3.2 The close proximity of underground pipes forming part of the Bogmoor Sump drainage system also needs to be considered.

3.3 The cost of construction has been rated High (SHELAA High Level Transport Review WO10) and the accident rate low. This is because few vehicles exit the current site access and only three people have regularly crossed the A30 on foot to and from Brightlands in the past 30 years.

*4.0 Access vi. A new pedestrian crossing to be located at the A30 linking the site to the village of Sutton Scotney;*

4.1 The siting of a pedestrian crossing will be crucial as this is a 40 mph trunk road on a slight curve with a small 'indent' in the road just after the access road to the southbound A34 services. Crossing from north to south it is possible to miss an approaching car which is momentarily hidden by the indent in the road. As above, if the grass and vegetation on the north side verge is allowed to grow then cars and motorcycles will possibly be lost from view.

4.2 Then there is the type of traffic and speed to consider. Whilst the A30 does not carry the volume of traffic carried by the A34 or A303 it is an 'agricultural corridor' stretching from Micheldever Station to the east to Stockbridge and beyond in the west. The road carries a considerable volume of oversized agricultural vehicles and equipment. This equipment is often shared between farmers and movement between farms is frequent and often moves at the 40mph limit. HGV's abound including Waitrose, AW Jenkinson Forest Products and many more using their agency cards to refuel their vehicles at the Texaco filling station.

4.3 The type of pedestrian crossing will be key to safe crossing of this 'A' road. A fairly recently installed crossing of the same road near the Texaco filling station has a central refuge. It is at a wider part of the road but the refuge is

barely wide enough to safely protect a parent pushing a buggy or a person on a disability scooter. Traffic passes uncomfortably close on either side. The A30 adjacent to Brightlands is less wide and the road may require widening to install a crossing.

4.4 Zebra crossings and pedestrian controlled crossings such as Pelican, Toucan and Puffin all require flashing lights of various types and colours and in the case of the latter crossings also audible signals. These types of crossing may not be appropriate in a village setting due to light pollution and noise.

5.0 *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;*

5.1 If residents need to cross a trunk road 4 times and a village 'high street' (Oxford Road) twice just to get from home to the Post Office and back they will take a car. A footpath cannot be constructed to the Post Office on the north side of Stockbridge Road East as there is insufficient width between the old railway abutment and the A30. So they will drive. Evidence – I've never seen my neighbours walk to the village in over 20 years. Use of the Post Office is increasing both as a banking hub and for the large number of returns of online orders.

5.2 There are no cycle paths to connect to and very little space to construct any through the village. Footpaths outside Oxford Road are narrow and often reduced in width by vegetation.

6.0 *Viii. Provide safe and convenient pedestrian access on to the adjacent PROW.* This must relate to the PROW on the west side of the site. Sadly, the LPA placed reliance on the 'Wates' report as this PROW was cut in two in 1981 when the A34 bypassed Sutton Scotney. Prior to this the footpath connected Sutton Scotney with Barton Stacey. Now the footpath is impassable for it's whole length and doesn't go anywhere leaving the Brightlands site totally landlocked without access to anywhere without crossing the A30.

6.1 Whatever is done will never be able to prevent development on Brightlands creating a village of 'two halves'. No one from the existing village will have reason to cross the A30 to Brightlands. Open space might just be an attraction but why cross a trunk road when excellent open space is already available at The Gratton without crossing a trunk road?

## 7.0 **SP2 Spatial Strategy**

*vi. Make use of public transport, walking and cycling safe and accessible, and integrate the development of homes, jobs, services and facilities, to reduce car use;*

### **Homes, jobs, services and facilities**

#### 7.1 Employment

Many people now work from home either as employees of larger companies or engaged in running small businesses. There is little local employment of note. A few low paid jobs exist at the A34 services, Sutton Manor Nursing Home and Norton Park Hotel but most people travel to London, Winchester, Basingstoke, Andover or Southampton for work. These journeys require use of a motor vehicle at least as far as railway stations at Winchester and Micheldever as there is no bus service to Micheldever and an inadequate service to Winchester and Andover. Public transport is of no use whatsoever to shift workers who require early and late buses.

## 7.2 Shopping

7.2.1 Services and facilities, such as they are, are centred on Sutton Scotney. There are none at Norton, Hunton or Stoke Charity and only the Wonston Arms at Wonston itself. Sutton Scotney has the excellent Dever Stores, a Spar shop in the Texaco garage and the Coach and Horses pub. There is a McDonalds, Costa Coffee and WH Smith in both the north and southbound A34 Services but these are predominantly used by those travelling on the A34. Local access roads to both service areas have restricted motor vehicle access from the A30 and no footpaths.

7.2.2 Neither village shop is suitable for a large weekly/monthly family shop. It would be impossible to stock sufficient goods to cope with demand. Neither shop is large enough to stock more than a limited range of fresh fruit and vegetables and no fresh meat or fish. The Dever Stores is not suitable for wheelchair access since the aisles are too narrow and the Spar shop at the Texaco garage has a ramp but no automatically opening doors. The latter shop is also too expensive for residents on low incomes. Taking one example a single pint of milk is 29p more expensive than the Dever Stores. Multiply this across a small basket of shopping and the difference is considerable. It is a convenience store but mainly for the convenience of passing motorists.

7.2.3 This means that a motor vehicle is essential to reach major supermarket chain stores at Winchester, Andover or Basingstoke contributing to air pollution and carbon emissions.

## 8.0 Healthcare

SU01 14.186

*This allocation falls within an area which is served by one or more GP practices. The NHS Integrated Care Board has advised that the relevant practices are working from surgeries which fall below relevant NHS space standards for the number of people on the current practice patient list. Further details are set out in the Council's Infrastructure Delivery Plan. Developers are encouraged to contact the ICB at an early stage to understand what the current position is, and any requests for support from the ICB to fund expansion. This will not apply to any development which comes forward under existing outline consents.*

8.1 GP services are available at The Gratton Surgery in Sutton Scotney only. This surgery also takes patients from South Wonston, local rural villages and as far away as large new developments at Picket Twenty Andover and Barton Farm Winchester which can lead to long delays in routine appointments. Routine appointments are currently a 5 week wait and blood tests, if available, are 6 weeks. Patients drive considerable

distances to visit the surgery. *These journeys all contribute to increasing carbon emissions.*

8.2 Encouraging developers to contact the ICB is too weak. A specified contribution to new GP's is essential per capita of new patients.

## 9.0 Reg 19 IIA Non Technical Summary page 49

IIA objective 5: To support community cohesion and safety in the district.

9.1 Our current community networks in Sutton Scotney work well due to the relatively compact nature of the village. Walking within the village is common and interactions between residents take place daily. Vulnerable residents are looked after and welfare checks are frequent. This relieves pressure on services such as the NHS and Social and Mental Health services.

9.2 My concern is that no one from the south of the A30 will have any reason to go across to Brightlands which will result in Brightlands residents feeling isolated. This will be keenly felt by those who do not leave the development for work, whether they be elderly, unemployed or disabled. They won't be looking out on dog walkers or other residents moving around the village. The potential highlight of their day will be the arrival of the postman. Feeling isolated can have a devastating effect on anyone affected by mental health issues and these feelings could be compounded by traffic noise in the vicinity. Brightlands will essentially be a 'dormitory village extension' disconnected from village life.

9.3 Past experience in Sutton Scotney has shown that where there is a low private uptake of affordable/low cost housing that housing associations acquire blocks of homes and introduce individuals and families from larger urban areas who are ill equipped to deal with village living. A proportion will be suffering from mental health issues and substance dependency. They feel detached from family support. This places a huge burden on our already overloaded GP Practice.

## 10.0 Infrastructure

### Education

10.1 There is no school within the Parish. There is an over subscribed Primary School at South Wonston and Secondary Schools in Winchester, Stockbridge and Whitchurch. Buses run to Winchester but there is no bus service to Stockbridge or Whitchurch.

There is, however, excellent nursery and pre-school provision with Busy Bees based in Sutton Scotney.

### 11.0 Communications

Sutton Scotney has its own Telephone Exchange and has access to Fibre to the Cabinet (FTTC) broadband at download speeds of up to 76Mbps. The further from the Exchange then the slower the broadband speeds so the outlying villages suffer a significant disadvantage. BT have no current time frame for introducing Fibre to the Premises (FTTP) to this area. This impacts greatly on the ability of residents and local businesses to operate efficiently and effectively. It most certainly is not gigabit broadband.



## 12.0 Community facilities

We are fortunate to have the excellent Victoria Hall in Sutton Scotney which caters for many and varied community activities and private bookings. The hall is a registered charity and is run by a committee of trustees.

We also enjoy the open space at The Gratton recreation ground which is looked after by The Gratton Trust. This area is used for football, tennis, table tennis, pentanque, walking and picnicking and features a trim trail and a children's playground. Other playgrounds can be found in Pigeon House Yard and Stoke Charity which are the responsibility of the Parish Council.

There are no organised activities such as a youth club for young people.

## 13.0 Public Utilities

There is no mains drainage for the majority of the Parish. Whilst this is not the concern of this Plan the lack of an efficient sewerage system is one of the greatest concerns for residents and has been for many years. Most homes have private sewage treatment systems (communal or individual septic tanks or cess pits). The prospect of new homes being immediately connected to a Southern Water sewerage system is already causing some resentment in parts of the village whose residents rely on sewerage systems first designed in the 19<sup>th</sup> century. The LPA is relying on 'assurances' from Southern Water concerning sewerage system upgrades but no help is planned for existing residents.

13.1 We are not on the gas grid. Therefore, we rely on electricity, oil, LPG or wood for home energy requirements. Our electricity supply is currently barely adequate with frequent 'micro power cuts' which last for a few seconds but are enough to crash computers and require clocks and timers to be reset. Any new development will require all electric homes with EV charging points and as fossil fuels are banned so all other homes in the village will make much greater demands on the electricity grid. It is likely that a new electricity sub station will be required. Again, the LPA is relying on 'assurances' from SSEN that the electricity infrastructure will be of sufficient capacity.

## 14.0 Lack of local infrastructure

14.1 Even though every parish/town council complains about the lack of local infrastructure in respect of adding to their population it cannot, and should not, simply be ignored. The availability of GP and Dentist appointments, school places, public transport, supermarkets, shops and employment are all of importance to every community and we should not make life even harder for people when the aims of a greener future are to give residents a healthier less stressful lifestyle. Rural villages do not adapt to 20 minute neighbourhoods.

14.2 Taking all of the above facts and suppositions into account it is clear that Brightlands does not even come close to qualifying as a sustainable development. The remote location of our villages relative to larger towns and cities mean that motor vehicles, whether conventional, electric or hydrogen fuelled will be necessary for the foreseeable future. There is no real local employment and neither is there any likelihood of any in the future.

14.3 Switching from driving to walking or cycling will, of course, save money and improve people's health but where are they going to walk or cycle to? Yes they can do it for leisure but they can't do it for shopping, work or education. Everything is too far away.

14.4 It may be that more housing is required nationally and it may be that there is a demand for housing locally but at what expense to those currently living in our villages? What we will be doing is actually compromising the lives of both existing residents and new residents alike by enlarging an area which already has precious little in tangible services and facilities.

## 15.0 **CN1 Mitigating and adapting to Climate Change**

*iv. Sustainable travel modes of transport have been fully incorporated into the layout in a way that encourages people to use more sustainable forms of transport such as buses, cycles or walking and reduces car dependency;*

15.1 See Also comments Policy T1. An infrequent bus service not suited to shift workers or residents wishing to avail themselves in the evenings of facilities in Winchester mean that private car use is essential. Additional homes will mean additional vehicles and will increase CO2 emissions and affect general air quality. Winchester City Council do not set the lead in encouraging bus travel as they are not planning to incorporate a new bus station in Central Winchester regeneration. Bus shelters will be spread kerbside around central Winchester causing confusion for passengers whilst affording them little protection from the elements. This will not encourage residents to leave their cars at home.

15.2 More homes requiring more deliveries from online shopping will mean ever more delivery vans entering the village on a daily basis. Patients visiting the Gratton Surgery drive their cars from considerable distances to attend appointments. All of this traffic comes from outside the village and increases CO2 and air and noise pollution.

## 16.0 **D7 Development Standards**

Pollution (excluding noise)

*Development which generates pollution or is sensitive to it, and accords with the Development Plan, will only be permitted where it achieves an acceptable standard of environmental quality and avoids unacceptable impacts on health or quality of life.*

16.1 Although there is no readily available data available it can be anticipated that Sutton Scotney suffers from high levels of airborne pollution due to their proximity to the high volumes of traffic on the A34, A303 and A30. Efforts are underway to reduce road vehicles powered by fossil fuels but this will not have the desired effect as data is available which shows that pollution from heavier Electric Vehicles is even worse as they have increased levels of tyre, brake and road abrasion pollution.

16.2 Air pollution is the biggest environmental threat to health in the UK, with between 29,000 and 43,000 deaths a year being attributed to long-term exposure. (UK Health Security Agency 2022).

Ignoring this issue will have a very negative impact on the health of new residents.

## 17.0 Noise

*Development which generates noise pollution or is sensitive to it will only be permitted where it accords with the Development Plan and does not have an unacceptable impact on human health or quality of life.*

### SU01 14.181

*The majority of the site is within an area where noise levels at night from roads and railways are above 50 dB or the noise levels as recorded for the 16-hour period between 0700 – 2300 are above 55 dB. Due to the proximity of the site to the services and major roads a noise assessment will be required in accordance with policy D7.*

17.1 The close proximity of three trunk roads (A34/A303/A30) means a high level of traffic noise for at least 18 hours a day. It continues to a lesser extent at night but, with windows open on hot summer nights, it does interfere with a good night's sleep. Often, the A30 is used as a night time detour when roadworks necessitate closure of the A303 between Micheldever Station and Andover and Bullington Lane and Oxford Road as a detour when the A34 is closed. Similarly when either the A303 or A34 are closed by road traffic incidents (regularly) then the village is the detour route.

## 18.0 T1 Sustainable and Active Transport and Travel

### 18.1 Public transport

We have a bus service serving Sutton Scotney to and from Winchester and Andover. Two routes have recently amalgamated so the village now shares a bus with Andover. Without the requirement for students to travel to secondary schools it is highly likely that our bus service would not exist. Public transport is of no use whatsoever to shift workers who require early and late buses.

Monday to Friday the service is generally hourly, but less frequent on Saturdays and with no service at all on Sundays and Bank holidays.

The last service from Winchester is at 1845 meaning that there is no way of using restaurants, pubs or entertainment in the city without either driving in or taking a taxi back. The last service from Andover is 1945.

At best, the bus service can be described as adequate for the demand which is essentially from students and senior citizens.

18.2 Hampshire County Council are the public transport authority but appear to have no money to subsidise bus services. Winchester District Council have no responsibility to ensure an efficient public transport service leaving provision to a commercial decision by bus operator Stagecoach. If demand is not sustained then the bus service will cease.

## 19.0 Walking and Cycling

19.1 Walking in Sutton Scotney is reasonably safe and easy as there are footpaths on Oxford Road and on Stockbridge Road West (south side). Vegetation along the latter is often a problem in late summer requiring detours onto the verges. Some developments such as Saddlers Close and Pigeon Field Field have footpaths whereas more modern developments such as Taylor's Yard and Station Drive do not. Street lighting is poor or non-existent once you leave Oxford Road.

19.2 Since the Post Office moved from the Dever Stores in Oxford Road to the Texaco Garage on Bullington Lane there is a real hazard in crossing the north end of Oxford Road near the Water Treatment Plant due to fast moving traffic coming off the A30. There is no crossing point or proper footpath and Hampshire County Council refused to create a proper footpath through the trees on the north east corner of Oxford Road as to do so would indicate that it was an approved place to cross the road when, in fact, it was too dangerous. *Copy of email dated 20<sup>th</sup> April 2021 from Hampshire Highways attached as Appendix B. Paragraph 3 applies.*

19.3 There are no roadside footpaths in Wonston, Hunton or Norton and only small sections in Stoke Charity. Walking (or cycling) between the villages is hazardous on narrow lanes often with fast moving traffic passing with feet or inches to spare.

19.4 There are some off road public footpaths between villages but they are, by nature, uneven and tricky to walk without care and are not suitable for cycling. Often in summer they become virtually impassable due to vegetation growth.

19.5 Cycling or walking further afield to Winchester, Andover, Whitchurch or Basingstoke is too far, and too dangerous for most average cyclists and walkers. Admittedly once you reach South Wonston then the improved footpath/cycle track across to Andover Road North near the Army Training Regiment does make it easier to reach Winchester.

19.6 I fail to see how any developer can meaningfully link in to the existing pavement/footpath system other than providing the means to cross the A30 and additionally across Oxford road to complete the journey to the Post Office. There is no cycle network to connect with.

## 20.0 T2 Parking for New Developments

20.1 One of the key changes in the District Green Plan is an about-turn on provision of car parking spaces in new developments. Instead of planners specifying the number of spaces per property it will now be for developers to justify provision of car parking spaces to reduce motor vehicle use. Given that some new homes will be purchased by families with adult children then a lack of parking spaces will mean on-street parking on the estate in inappropriate places or even parking in other areas of the existing village. Lack of parking spaces might even mean slow sales of new homes and ongoing and slow construction. Neither scenario would be good for the village.

## 21.0 T4 Access to New Developments

*ii. Addresses the needs of people with disabilities, children and those with*

*reduced mobility in relation to all modes of transport; including the provision of appropriate crossings at appropriate locations;*

21.1 An additional crossing will be required on Oxford Road south of the roundabout and within the 30mph limit to serve the Post Office, Winchester bus stop and the school bus pick up. (This is not mentioned in SU01).

21.2 This poses problems as vehicles park the whole length of the east side of Oxford Road. Clearly a crossing between parked cars is not safe. Therefore, a parking ban will be required for an appropriate distance requiring yellow lines in a conservation area and depriving existing residents of parking spaces.

## **22.0 NE1 Protecting and enhancing Biodiversity and the Natural Environment in the District**

Ecological Buffer Zones (2023 SHELAA report)

WO10 Brightlands

- Within 200m of Priority Habitats
- Within 200m of Protected Species Records
- Within 100m of moving water
- Within 1km of SSSI

## **23.0 NE5 Biodiversity**

23.1 Developing Brightlands will result in a loss of biodiversity and habitat. Of necessity the southern hedges will be removed for road safety and in an attempt to make the new development feel a part of the village. The demolition of the old farm buildings and bushes in the middle of the site will displace barns owls who breed here every year. The field is rich in short tailed voles which are the primary food source for the barn owl. Slow worms and small reptiles can often be found and bats towards the eastern edge.

## **24.0 Loss of agricultural land**

### **Reg 19 IIA Non Technical Summary page 18**

*Although the District has very little of the highest grades of agricultural land, its large areas of Grade 3 agricultural land are a significant asset to the District, and new development and climate change put pressure on the availability and productivity of such soils.*

24.1 SU01 is currently given over to agriculture. It is Grade 3 Agricultural Land and is particularly productive with high quality arable crops being used for seed production. At a time when the former Secretary of State for Defence the Rt Hon Grant Shapps makes a statement that the UK is now 'in a pre-war phase' and the current Chief of General Staff Sir Roly Walker said, on 24<sup>th</sup> July 2024, that we need to be prepared for war in 3 years, we need to ensure that we are self-reliant on food production for the future. The UK needs to be more self sufficient in food production so as not to be so vulnerable to events such as the war in Ukraine, which has affected wheat production. It would be short-sighted indeed if we sacrificed good productive land for housing when there are alternative, more suitably sized sites remaining.

## 25.0 NE6 Flooding, Flood risk and the Water Environment

### Reg 19 IIA Non Technical Summary page 64

*The delivery of a relatively high level of development in Winchester District will invariably result in an increase in the extent of impermeable surfaces as greenfield land take occurs. Loss of greenfield and soil sealing will limit the areas at which surface water can safely infiltrate and is likely to disrupt natural drainage patterns.*

#### 14.184 SU01

*The village of Sutton Scotney has experienced high levels of groundwater flooding and infiltration drainage issues. Due to historic flooding events, it is advised to engage early with the Lead Flood Authority. Additionally, engagement with the Environment Agency is encouraged because of the site's proximity to flood zones 2 and 3. Given the historical presence of silt in the area, as part of the design process, it will need to be demonstrated how this issue is dealt with during construction and post occupation. As there can be high levels of groundwater which have the potential to restrict drainage outfalls for a considerable period, surcharging will need to be considered with appropriate SuDS / land uses considered to manage flood risk in a groundwater flood event scenario. In order to be able to manage groundwater flood risk, the use of open space and SUDS should be considered to create a buffer between the site and the main road to the south.*

25.1 The inclusion of the above paragraph recognises the considerable risk of developing Brightlands in relation to flooding.

25.2 What we don't know at present is how developing SU01 at Brightlands might contribute to flooding. What we do know is that those 5.277 hectares act as a giant sponge and that the water table remains high for a large part of the year; so high that it sometimes fills septic tanks on the land. It is great for the arable crops grown here.

25.3 If this land was developed what rainwater run off might we expect and where would it go? Well, it can only go one way and that's south east. To the west is uphill and to the east there is a railway embankment. It will join up with the surface water coming from Oxford Road.

25.4 In terms of volume of water runoff it seems that we can estimate this using a specially designed calculator <https://www.omnicalculator.com/other/rainfall-volume#why-calculate-rainfall-volume>

25.5 If we know how much rain falls in a given period and we know the area of land then we can tell how much water is being absorbed. Obtaining accurate local rainfall has not yet been possible but, using data recently published by the Environment Agency for rain falling at Otterbourne we can come up with a rough idea.

25.6 From August 2023 to March 2024 979mm of rain fell at Otterbourne. Sutton Scotney might have been more or less but it's a guide. If we feed 979mm and 5.277 hectares into the calculator we find the volume of rain equates to 51.6 million litres or 11.3 million UK gallons.

25.7 If Brightlands was to lose 50% of its 'absorbency' due to buildings and hard surfaces then rainfall runoff would amount to approximately 25 million litres or 5 million gallons. This is in addition to the surface water which runs off the acres of tarmac at the

southbound A34 services to the west and eventually runs into Brightlands.

25.8 At the present time rainwater flows from the A34 bridge down to the access road to the southbound A34 services and pools right across the road before draining across to Brightlands. Rain water falling east of the access road flows at speed down to the drains near the Texaco Garage and has caused a deep gully wearing the verge away on Stockbridge Road West opposite Saddlers Close. Development is a big risk.

## 26.0 **NE14 Rural Character**

26.1 Sutton Scotney village population has doubled in size since 1998. There have been significant new developments in Saddlers Close, Sutton Park Road, Pigeon House Yard, Pigeon House Field, Taylors Yard, Station Drive, Buddlesgate and Harding Close. There has been so much development that the area inside the settlement boundary is now full. The previous biggest development was 30 homes. Adding 60 - 120 new homes to the village is out of all proportion to the existing village size and will irreversibly alter the rural character of Sutton Scotney.

## 27.0 **NE16 Nutrient Neutrality Water Quality Effects on the Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar Sites of the Solent and the River Itchen**

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*Pollution from surface water runoff from both agricultural and urban areas can occur during extreme weather events which are more likely to occur with climate change. Increased levels of nitrogen and phosphorus input to rivers in Winchester District from agricultural sources or from wastewater from existing housing and other development are adversely affecting water quality in some of those rivers, including the River Itchen SSSI and SAC.*

27.1 This fails to recognise similar issues affecting the SSSI of the River Dever and River Test from development on Brightlands. See NE17. Also, sewage from new development at Brightlands will be treated at Harestock and discharged into the River Itchen. In effect Brightlands will be discharging into **both** SSSI's in the district. Not something to be lightly overlooked.

## 28.0 **NE17 Rivers and Their Settings**

7.121

*Chalk streams are a rare and valuable habitat. 85% of all chalk streams are found in England, mainly in the south and east of the country. Hampshire is considered a key area with the River Test, Itchen and Meon all being filtered through chalk and therefore nurturing a thriving ecosystem. Chalk aquifers are also an important source of water for drinking, agriculture and industry and support angling for trout, salmon and coarse fish. Good quality water is required in order for the different species of fish, plants and insects to thrive. Many of these species are unique to the chalk streams such as the southern damselfly which is why it is important that they are protected.*

28.1 The cleanliness of surface water runoff from any Brightlands development is crucial to the protection of this world renowned rare and valuable habitat since the River Dever feeds directly into the Test.

## 29.0 HE7 Non-designated Archaeological Assets

14.183 SU01

*The area in general has a high archaeological potential and it is likely that archaeological remains will be encountered. Records show that a Roman building of some status was reported at or near this location. It is possible that an archaeological issue will emerge.*

## 30.0 Winchester District Local Plan

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*The Localism Act 2011 stresses the importance of community involvement in the planning system, and of enabling communities to make a significant contribution towards shaping the places where they live. The Plan has been developed in accordance with the city council's adopted Statement of Community Involvement. – updated in 2024.*

30.1 Sadly, in the case of Sutton Scotney, the LPA totally failed us in this respect. Whilst they may be correct in law that land allocations are not required at Regulation 18 stage, how does this sit with regard to the more than 3,000 public responses at Regulation 18 from other towns and parishes, of which more than 800 related to land allocations? Representations at Regulation 19 cannot really define the shape of anything; at best pointing out obvious errors and failings.

30.2 If procedures can be a reason for failing a soundness test then, in the case of SU01, this policy should fail. Sutton Scotney was not included at Regulation 18 and residents were not consulted in accordance with the Council's own Statement of Community Involvement. It cannot be right that 99% of the residents of the Winchester District have a comprehensive say in the Plan but 1% at Sutton Scotney do not.

30.3 The Policy SU01 should also fail in soundness as all proportionate evidence has not been considered and there has been a clear failure to fairly examine other reasonable alternatives, particularly land allocation WO11 (2023 SHELAA report) land south of Wonston Road and for residents to be given a choice. On 4<sup>th</sup> September 2024 the Parish Council held a public meeting in Sutton Scotney where the overwhelming choice of site was for WO11. (See Wonston Parish Council response) When most village facilities are east of Oxford Road (Post Office, Dever Stores, GP Surgery, Victoria Hall, Winchester bus stop, School bus pick up and drop off stops, Gratton Recreation Ground) it makes little sense to make new residents cross the A30 and Oxford Road to access them when living at WO11 would mean crossing just one minor road.

30.4 The decision to select SU01 over WO11 is also flawed regarding the number of homes to be built. Why lose 5.2 hectares of agricultural land for 60 homes when there is another site WO11 half that size and better suited to village inclusion? The total confusion of new home numbers mentioned earlier



is indicative of the rushed and muddled inclusion of SU01.

30.5 Policy SU01 should also fail as it is unlikely to be deliverable based on 50–60 homes and building 100-120 homes to achieve profitability will be out of all proportion to the size of the existing village and the reported aims of the LPA.