

11 October 2022

Delivered by email and post

Local Plans team
Winchester City Council
City Offices
Colebrook Street
Winchester
SO23 9LJ

Ref: HATS3005

Dear Sir/Madam

LAND AT WONSTON ROAD, SUTTON SCOTNEY

These representations are submitted to the Winchester Local Plan Review Regulation 19 (the 'Reg 19 Plan') and supporting evidence on behalf of our clients Hathor Property, and in respect of land south of Wonston Road, Sutton Scotney, as identified at **Appendix 1**. This project has also been referred to as Pennybar in more recent consultation within the Parish Council and local community.

These representations are submitted to complement the completion of the on-line forms and should be read in conjunction with the forms given the additional detail provided. Reference is made to specific policies and evidence base documents where relevant.

The representations made, particularly in relation to housing provision and requirements, are in the context of the proposed amendments to the National Planning Policy Framework (NPPF) which were published for consultation in July 2024. It is understood that the Council's intention is to submit the Reg 19 Plan for examination under Regulation 22 on or before [publication date + one month] of the amended NPPF. Therefore, in accordance with the draft transitional arrangements set out at paragraph 226 (c) of the revised NPPF, the Plan can be determined in accordance with the current NPPF.

This is important as, along with other important proposed updates, the proposed revised Standard Method has a significantly higher housing requirement for Winchester of 1,099 dwellings per annum (dpa), relative to 676 dpa currently.

In progressing the Reg 19 on the basis of the current NPPF and SM, based on the currently transitional arrangements the Council are relying on submitting the Plan under Regulation 22 before or 1 month after publication of the revised NPPF. These timescales are not fixed and cannot be guaranteed. However, on a without prejudice basis these representations are based on the assessment of the Plan on the basis of the current NPPF. It should be noted that the transitional arrangements within the amended NPPF in any case commits LPAs to an early review of the Local Plan in these circumstances.

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Background to the Site

The site is located adjacent to the settlement policy boundary of Sutton Scotney as identified in the Regulation 19 Local Plan proposals map and is therefore currently within the countryside for planning policy purposes. The settlement boundary extends along Wonston Road, and the site is located immediately south of this and extends to approximately 2.78 hectares.

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

There is extensive existing trees and vegetation on the northern and eastern boundaries, and distinct clumps of mature trees to the south. The western boundary to the car park has more patchy trees and vegetation. Combined with its low-lying nature it is well contained from wider views. There is a public footpath that extends north-south through the eastern part of the site.

There is small strip of Flood Zone 2 and 3 that extends from Wonton Road into the site for a distance of around 30-35 metres, broadly including the footpath and area immediately adjacent, and a marginally wider area that is also subject to surface water flooding. The site is outside but adjacent to the Conservation Area boundary, which extends along the northern side of Wonston Road. There is Grade II Listed Building (Witt's Cottage) to the north of Wonston Road opposite the War Memorial, which is also Grade II Listed. Manor Farm House is also Grade II Listed, and both the house and its outbuildings are also within the Conservation Area.

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

As outlined above, the site is not identified as an allocation within the Reg 19 Plan. However, it was formally promoted through Regulation 18 Local Plan representations and has been assessed within both the Strategic Housing and Employment Land Availability Assessment July 2023 and the Integrated Impact Assessment Report July 2024, as part of the relevant evidence base supporting the Local Plan. Various meetings and discussions have taken place with City Council officers regarding the suitability of the site for an allocation on a without prejudice basis.

Strategic Housing Land and Employment Land Availability Assessment (SHELAA) July 2023

The land is identified within the Strategic Housing and Employment Land Availability Assessment (SHELAA), July 2023, under site reference WO11 . The capacity of the site was estimated to be around 52 dwellings based on a total site area of 2.67 hectares, allowing for open space provision, and applying a density of 30 dwellings per hectare.

The SHELAA confirms that the site is available and deliverable. Most of the constraints are summarised as 'green', i.e. not a constraint. There are some limited constraints identified as 'Amber': Countryside location; Minerals and Waste Safeguarding Site; Flood Zone 2 and 3; and Accessibility. Landscape is noted as 'red' although in accordance with paragraph 5.14 of the main SHELAA report this should be 'amber'. Paragraph 5.14 states that:

"The landscape team have used RAG ratings (red, amber and green), however, for the purpose of the SHELAA assessments any site scoring red is noted as amber. The SHELAA is a high level assessment of

sites and therefore is it not considered appropriate at this stage to rate a site red for the SHELAA assessments due to the limited level of information provided, whether the whole site would be developed and any mitigation not being known.”

My client agrees with this approach. Whilst a level of proportionality is required at Local Plan level, it is neither reasonable nor appropriate to identify a site as having significant adverse landscape impact based on a high level assessment. These judgements should be undertaken on a much more detailed level by suitably qualified landscape consultants using best practice methodology. My client would draw attention to the Landscape and Visual Appraisal included at **Appendix 2** and related conclusions. This is considered in more detail below as part of the assessment of the Sutton Scotney Site Selection Information August 2024 evidence base document.

The Amber constraints identified do not represent insurmountable constraints. A countryside location is of course relevant to all new greenfield allocations; and Flood Zone 2 and 3 include only a small part of the west of the site and any residential development can be confined to Flood Zone 1. Site reference WO10 is listed as Green for Flood Risk, when it also includes Floods Zone 2 and 3 in the far south-east corner of the site adjacent to the A30.

Accessibility is listed as Amber. Although it is within 800m of a bus stop and facilities and services in Sutton Scotney, this does not include a Primary School. This is the case with other SHELAA sites within Sutton Scotney, which also score Amber.

With regard to Minerals Safeguarding, it is unclear why the site has been listed as Amber as it is not within a Minerals Safeguarding Area as defined within the Hampshire Minerals and Waste Local Plan inset map. Conversely, site reference WO10 is listed as Green implying it is outside a safeguarding areas but it is identified within it.

The above constraints are assessed as part of these representations and are considered can be suitably addressed as part of consideration of the allocation of the site for residential and open space use, which is considered appropriate and necessary as set out below, and therefore are not regarded as insurmountable.

Integrated Impact Assessment Report (IIAR) July 2024

The site is similarly assessed within the IIAR, which combines the necessary Sustainability Appraisal and Strategic Environment Appraisal to support the Reg 19 Plan, but with a much greater level of detail as required by Regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004. Appendix E of the IIRA details the Site Assessment criteria and related scoring.

My client has undertaken a critical assessment of the IIRA as it relates to the assessment of the site and completed a comparative assessment relative to the proposed allocation within the Regulation 19 Plan at Brightlands (Policy SU01). This is included at **Appendix 3**.

This has identified some significant flaws with the scoring within the assessment that does not justify the allocation. A summary of the assessment is detailed below:

- failing to reflect the implications of noise considerations from the A34 and related service area on any future development of the draft site for allocation (IIA4: To improve public health and wellbeing and reduce health inequalities in the District);

- downplaying the implications of crossing the A30 trunk road as a barrier/influence to encouraging ped/cycle movements to the village/services and minimising car travel (IIA 2 : To reduce the need to travel by private vehicle in the District and improve air quality and IIA7 : To ensure essential services and facilities and jobs in the District are accessible) and
- the failure to assess the impact of my client's site on the landscape on a fair and reasonable basis.

In addition to the above, insufficient consultation has been undertaken with the Parish, local community and key stakeholders in assessing options for allocations within Sutton Scotney. Regulation 13 of the Strategic Environmental Assessment Regulations requires necessary supporting evidence to be subject to effective consultation. It should enable as many interested parties as possible to provide feedback, with sufficient details and timescales for a considered response. It is our understanding in this instance this was limited to a questionnaire to residents with limited detail of potential sites, and the decision making process based on limited responses.

This is likely to be a consequence of the relatively recent confirmation that Southern Water have a committed programme to upgrade drainage infrastructure in Sutton Scotney, and therefore that the principle of an allocation within the Regulation 19 Plan is only recently being considered reasonable. This is referenced in the Table accompanying paragraph 5.6 of the Development Strategy and Site Selection (DSSS) July 2024 which summarises the consultation between WCC and Parish and Town Councils. For these reasons an allocation was not included in the Regulation 18 Plan, although Sutton Scotney was recognised in the Plan as an intermediate rural settlement which was appropriate for the identifying new sites for 50-60 dwellings.

Subsequent more extensive community consultation has taken place. This included a presentation day at the village hall on 4th September where representatives from both site promoters for WO10 and WO11 were invited. The Parish Council produced boards with information relating to the draft allocation, and my client's provided information and plans regarding Wonston Road. Only my client and representatives attended. Subsequently, a further consultation event was held on 25th September by WCC where information regarding both sites were presented. Again, from the promoters' side this was only attended by my client and related representatives.

In addition, my client undertook a separate consultation exercise with the community. This involved distributing over 600 leaflets to local residents and directing them to a web site with more information and an inviting them to answer key questions regarding the proposals. A summary of all the above engagement is included at **Appendix 4**.

However, both events were post the publication of the Reg 19 Plan for consultation and therefore cannot have been considered in determining allocations. As referenced in xxx, the results of this consultation would have favoured an allocation at my client's land interest rather than the Reg 19 draft allocation.

Secondly, Regulation 12 (2) of the Strategic Environmental Assessment Regulations requires likely significant effects of the draft Reg 19 Plan, including draft allocations, to be evaluated as well as reasonable alternatives. As with other settlements, the Wonston Parish Site Assessment on page 284 of the Integrated Impact Assessment, which is critical in determining a preferred allocation, does not provide a fair assessment of both the draft allocated site and other sites assessed on a level playing field. It only scores the draft allocated site with mitigation and consequently, it does not provide a fair or appropriate assessment of reasonable alternatives.

This approach is confirmed at paragraph 2.65 of the IIRA. This states that *'where an adverse effect had been recorded for site options in relation to IIA objectives 10 or 11 and the related site allocation policy included requirements (e.g. the incorporation of landscaping or green infrastructure or an approach that would protect important views) that could provide mitigation, the negative effect was reduced accordingly'*.

More specifically in respect of the consideration of noise impacts in considering potential site allocation, it is worth emphasising that at paragraph 4.291 the IIRA confirms that *'The potential negative effects identified by the IIA of residential site options could be avoided by selecting sites outside of air and noise pollution hotspots, such as close to the district's main roads and rail lines as well as Southampton Airport.'* Whilst there is no definition of a noise pollution 'hot spot', the draft allocation at Policy SU1 is within a noise sensitive area, where other allocation options exist outside such locations.

Development Strategy and Site Selection (DSSS) July 2024

Sutton Scotney is assessed as an intermediate assessment within the DSSS consistent with the spatial strategy within the Reg 19 Plan. My client supports this identification which acknowledges the facilities and services that exist within the village and related sustainability credentials. Paragraph 6.39 confirms that *'in accordance with their place in the settlement hierarchy, these settlements were assessed to consider their potential to deliver about 50-60 homes on additional allocations over the plan period.'*

The DSSS identifies two sites from the SHELAA 2023 that were located adjacent to the settlement policy boundary of Sutton Scotney : WH10 (Brightlands) and WH11 (Wonston Road). The IIRA assessment scoring for each site is extracted and summarised at paragraph 6.39.

Of note is the reference at paragraph 6.47 to the combined capacity of both sites of 147 units. This is calculated by combining the estimated capacity of WH10 (95 dwellings) and WH11 (52 dwellings) as set out within the 2023 SHELAA.

Paragraph 6.49 then advises that *'Following consideration of the representations received at the regulation 18 consultation, discussions with the Ward Members and Wonston Parish Council and potential impacts and opportunities, the proposed submission Plan includes the proposed following allocation at Sutton Scotney (WH10 Brightlands). No capacity for the site is referenced. Paragraph 6.50 advises that site (WO11) 'is considered more visually sensitive and partially falls within flood zones 2 and 3.'*

For the reasons identified above and **at Appendix 3** in respect of the IIRA methodology and assessment, my client is concerned that the assessment of potential impacts and opportunities must be viewed with considerable caution. Equally, it is unclear from the evidence base what discussions with Ward members and the Parish Council are relied upon to justify the draft allocation. As no sites were identified at the Regulation 18 stage unsurprisingly there are no specific comments from the Parish Council or ward members regarding the merits or otherwise of the draft allocation. Of note is that the only formal representations submitted at Regulation 18 stage that specifically referenced sites in Sutton Scotney, as set out within the relevant evidence base document, were on behalf of my client promoting the site at Wonston Road.

Conversely, as set out above, the more recent engagement with the Parish Council, and local community has indicated that an allocation at Wonston Road is preferred.

Sutton Scotney Site Selection Information August 2024 (SSSI)

The above has been published relatively recently and as a specific evidence base document. Given the evidence included within the DSSS above, it is unclear why WCC have published a specific Site Selection Information update for Sutton Scotney. No other settlements have been subject to the preparation of additional evidence in relation to site selection.

The SSSI confirms that as both SHELAA site WO10 (Brightlands) and WO11 (Wonston Road) are located adjacent to the settlement boundary, they are considered appropriate for further consideration. It goes on to confirm the scoring in respect of various constraints as identified within the SHELAA. This again repeats the erroneous scoring in relation to landscape and minerals safeguarding for WH11 as identified above.

The SSSI provides more detail on WCC assessment of the merits of WH11 against various considerations.

With reference to landscape impact, an 'initial landscape appraisal' has been undertaken, and is set out at Appendix 2 of the SSSI. The SSSI notes that the site *'is screened from the east due to the heavily vegetated former railway line and from the north by the hedge alongside the Wonston Road'*. It is considered *'more open from the south and west'* and specific reference is made to *'viewpoints from i) from the public right of way which provides access from the village into the open downland countryside to the south of the village where PRow's are considered sensitive receptors; (ii) from Winchester Hill, looking NE on approach to the village; (iii) from the Victoria hall car park, and (iv) glimpses from Wonston Lane to the SE.'*

The landscape appraisal concludes that the site has a high landscape character sensitivity, a very high visual sensitivity, and medium value. The overall score is 12, which advises that *'protection from development is the preferred option.'* Although the landscape appraisal provides some more detailed commentary on the methodology used, as with the SHELAA assessment above, whilst a level of proportionality is required at Local Plan level, it is neither reasonable nor appropriate to categorise a site as *'protection from development is the preferred option'*, based on a high level assessment.

Appendix 2 of these representations includes a Landscape and Visual Assessment of the site undertaken by a qualified landscape consultant in accordance with best practice. This specifically assesses the site from specific viewpoints referred to within the SSSI.

This concludes that *'With the implementation of a successful mitigation strategy, the overall impact on the landscape is considered to have a minor overall effect on the surrounding landscape character and a moderate effect on the visual baseline. It should be considered that this type of development is not out of character within the receiving landscape.'*

The related conclusions on the Landscape Visual Sensitivity and Magnitude of Impacts a more reasonable conclusion to have reached was that the site should sit in the *'development could be accommodated without changing landscape character with certain provisos'* scoring category.

In respect of flood risk, the SSSI refers to *'land to the south of the settlement (WO11) floods and water flows through the site.'* This is technically correct, but as identified on the accompanying plan extract of from Hampshire County Council flooding included within the DSSS, and confirmed by Environment Agency flood mapping available on-line, this only extends north-south through western part of the site,

close to the route of the existing PRoW. The SSSI also makes reference to problems with silt and known high water ground levels on WH10.

The remainder of the site to the east is on higher ground and within Flood Zone 1 and not subject to any surface water flooding. As identified on the opportunities plan at **Appendix 1** and site surroundings features plan at **Appendix 6**, this is where residential development can be located, and with a suitable drainage strategy any additional flood risk can be suitably mitigated.

Included at **Appendix 4** is a Flood Risk, Surface Water & Foul Drainage Assessment of the site provided by Ark Environmental Consultants which concludes that *“The area of proposed residential habitable footprint will be located outside of the historic flood extents and all other flood mapping extents, and wholly in Flood Zone 1. This is NPPF / PPG appropriate and all other elements of the scheme can be NPPF / PPG sequentially appropriate.”*

The comments from the LLFA highlighted within the SSSI are simply reflecting the flood mapping information. The DSSS inference that according to the LLFA that when comparing the 2 sites, *the northern site represents the lowest impact on flood risk*, is misleading. It would be more reasonable to conclude that although both sites contain elements of Flood Zone 2 and 3 and surface water flooding, residential development can be accommodated outside these zones and flood risk suitably addressed through appropriate drainage strategy and minimise impact on groundwater.

Regulation 19 Local Plan

Local Plan Vision and objectives

My client supports the Local Plan Vision and in particular that the market towns and rural villages will accommodate changes to support evolving communities and the economy, with modest growth to meet their needs to support local services and facilities whilst retaining their identity and character.

Similarly the related objectives at paragraph 3.6 are well considered. However, my client would stress the importance of demonstrating the imposition of LETI standards for residential development will not adversely affect viability. It is acknowledged that significance evidence has been presented to justify this approach.

Policy SP2 Spatial Strategy and Development Principles

The broad intention of the Policy and related distribution of growth is supported. It is agreed that the Market Towns and Rural Areas, including Sutton Scotney as an Intermediate Village, can deliver housing, economic and community development that serves local needs in the most accessible and sustainable locations.

However, the Plan does not provide for a sufficient level of housing to meet needs. In addition, some of the specific sites identified within the Plan will not deliver the anticipated level of housing either within the five year period or the broader plan period. This is considered in further detail below against relevant policies.

Policy CN3 : Energy Efficiency Standards to Reduce Carbon Emissions

The Policy sets out the requirement to deliver new residential development that complies with the LETI standards. These standards go above and beyond the proposed Future Homes Standards to be incorporated with Part L of the Building Regulations. While this is commended, in order for the Local Plan to be found sound when it comes to Examination it is essential that any requirements that go beyond current or planned building regulations are well-reasoned and include a robustly costed rationale that ensures development remains viable and that the impact on housing supply and affordability is considered in accordance with the NPPF.

This position is highlighted within Housing Minister Lee Rowley's written ministerial statement (WMS) that accompanied the current consultation on the Future Homes and Buildings standards to be delivered by way of changes to Building Regulations (12 December 2023). The WMS states:

"... the introduction of the 2021 Part L uplift to the Building Regulations set national minimum energy efficiency standards that are higher than those referenced in the 2015 WMS rendering it effectively moot. A further change to energy efficiency building regulations is planned for 2025 meaning that homes built to that standard will be net zero ready and should need no significant work to ensure that they have zero carbon emissions as the grid continues to decarbonise. Compared to varied local standards, these nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes.

The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government's commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale."

Policy H1 : Housing Provision

The Plan covers the period to 2040 and contains proposed allocations to meet housing requirements over the plan period. These include both new allocations and allocations carried forward from the adopted Plan. It includes the current Standard Method (SM) requirement of 676 dpa as a starting point and my client acknowledges this is consistent with current NPPF guidance. Taking into account the SM for the early years of the plan, this equates to 13,565 dwellings for the district over the Local Plan period to 2040. As highlighted above, this compares with a requirement set out the proposed revised SM for Winchester of 1,099 dpa, set out within the NPPF consultation.

However, paragraph 35 (c) of the NPPF confirms that in order for a Plan to be considered sound it must be positively prepared, and as a minimum, should meet the area's objectively assessed needs, as well as unmet need from neighbouring areas where it is practical to do so and is consistent with achieving sustainable development.

The Plan acknowledges at paragraph 9.16-9.18 that within Southern Hampshire there are a number of authorities that appear unable to meet their Standard Method housing need in full. The Partnership for South Hampshire (PfSH) has developed a Spatial Position Statement (SPS) published in December 2023 to address this.

This SPS recognises that in the short to medium term several authorities, including Winchester, should potentially be able to exceed their Standard Method based housing needs (para 3.33). Accordingly, WCC provide an uplift to the housing requirement of 1,900 dwellings to help contribute towards the PfSH shortfall.

Taking into account the unmet need uplift, this equates to total provision of 15,465 dwellings over the plan period, or 773 dpa. This does include 350 dwellings within the South Downs National Park part of the administrative area over the plan period.

The SPS is referred to specially within the Duty to Cooperate (DoCS) Statement (September 2024) published by WCC. However, neither the SPS nor the DoCS Statement provide any justification for the provision of 1,900 dwellings to meet unmet needs. Table 1 of the SPS identifies total unmet needs across PfSH of over 11,000 dwellings. This is a significant shortfall and whilst clearly Winchester cannot be expected to meet all of these needs it should be looking at developing a spatial strategy that would meet more of these needs than is currently being proposed.

Further evidence needs to be provided to justify why a figure of only 1,900 dwellings has been put forward. In the absence of this, it is difficult to determine whether this is reasonable in the context of the Reg 19 Plan being 'positively prepared'.

In addition to the above, there is no specific increase to account for any affordability as this is argued is already considered within the Standard Method. It is worth emphasising that the need for affordable / social rented housing in WCC has increased to about 368 dwellings per annum Winchester (Strategic Housing Market Assessment Update 2024).

Policy H2 : Strategic Housing and Supply

Policy H2 includes an approach to phasing new greenfield housing sites allocated within the Reg 19 Plan. This is intended to prioritise the development of previously developed land and achieve a suitable housing trajectory, by holding back most allocated greenfield sites until the later parts of the Plan period. Accordingly, new greenfield allocations will not be permitted in advance of April 2030 unless they are needed to overcome a district level housing land supply shortfall, or to meet an identified priority need.

Whilst the ambition is commendable, it brings with it a significant risk of failing to deliver sufficient housing to meet needs within the five year period. As evidence below, several of the allocations on previously developed sites have considerable uncertainty regarding timescales for delivery. It is accepted that Policy H2 has a caveat in relation to circumstances where there is a housing land supply shortfall, but this builds in a risk that speculative applications that sit outside the existing and proposed commitments will come forward.

Policy W1 : Barton Farm

Barton Farm is a former allocation that benefits from outline planning permission and several reserved matters. It includes numerous facilities and services as part of the permission. Barton Farm Primary Academy, a 420-place primary academy for children aged 4-11, opened in September 2020. The ongoing allocation continues to commit to the provision of a new local centre, small-scale employment uses, pre-school facilities and a Park & Ride.

Barton Farm is located approximately 1 kilometre east of my client's land interest at Harestock Road, and some of these facilities will be accessible by non-car modes.

Whilst the principle of the ongoing allocation is supported, based on historic delivery rates my client does not consider that the entirety of the allocation will be delivered within the plan period to 2040.

Para 12.5 of the Plan states that *'some 1,541 dwellings remained to be developed at April 2023'*. The Council anticipates delivery at a rate of 115dpa, as set out within the Authorities Monitoring Report (December 2023), which would equate to 1,840 dwellings to 2040 (16 * 115). However, the site is being progressed by single housebuilder, Cala Homes, and their related affordable partner, Vivid. Delivery has therefore been consistent but relatively low over a number of years, and it is considered a more cautious approach of assuming delivery of 75 dph would be appropriate. This would equate to 1,200 dwellings, a shortfall of some 341 dwellings.

Policy W2 : St. John Moore Barracks

My client would query whether there is sufficient certainty that all of the allocation, particularly the residential parcels, will be delivered within the plan period. It is understood that consultation with the local community and key stakeholders is currently ongoing ahead of the submission of an outline application in Spring 2025.

The timescales set out within the consultation web site suggest delivery of new homes from 2027. This is ambitious, and past experience with delivery of housing from large sites such as this will take longer than this : *'...sites of 1,000+ dwellings take on average five years to obtain detailed planning permission, then a further 1.3 to 1.6 years to deliver the first dwelling.'* (Start to Finish 3 Lichfields – March 2024 Executive Summary). This would suggest delivery from 2031-32 at the earliest, making it very challenging to delivery up to 1,000 completions by 2040.

Policy W7: Central Winchester Regeneration (CWR)

My client supports the principle of an allocation at CWR for mixed use including approximately 300 dwellings. However, this is a long standing allocation that has been carried forward from previous adopted Plans. It is a complex site with significant constraints including both built heritage and archaeology, flood risk and securing nutrient neutrality.

Whilst a development partner was secured in 2023, consultation and engagement are ongoing and there are currently no timescales for the submission of an application. Therefore, for similar reasons in respect of Policy W2 above, the delivery of approximately 300 dwellings within the plan period to 2040 is ambitious.

Policy W8: Station Approach

Station Approach is another long-standing allocation carried forward from previous adopted Plans. Whilst design concept plans are currently being developed by consultants, there is no development partner in place.

My client again supports the ambition of the Policy to secure the regeneration of this brownfield site, but its deliverability and timescales for delivery are again highly questionable in the absence of more detailed evidence.

Policy SU1 : Brightlands

My client has significant reservations about draft allocation at Policy SU1. As highlighted above, the evidence base to support the allocation relative to my client's land interests is fundamentally flawed. The relevant extracts of the SHELAA, IIRA, DSSS and the details within the SSSI all contain inconsistencies and errors that, had they been appropriately addressed, would very likely have led to a different conclusion being reached about the preferred site.

There are also inconsistencies with stated capacity of Policy SU1 itself and whether, taking into account mitigation necessary to address constraints, it is deliverable.

Policy SU1 identifies an indicative capacity of 50-60 dwellings within a site area of 5.28 hectares as identified on the accompanying plan. This is consistent with the **Policy H3**, the Market Towns and Rural Areas strategy and table at 14.7 which identifies a range of 40-60 for Sutton Scotney to contribute toward meeting housing requirements. However, both the SHELAA and DSSS refer to a higher capacity of 95 dwellings.

Though the site has been promoted through the SHELAA, no formal representations have been submitted on behalf the landowner commenting on the allocation. However, it is understood that following more recent engagement with the Parish Council that at 50-60 dwellings, as set out within Policy SU1, the development is not viable, and that around 120 dwellings are required . If the required policy capacity renders any residential scheme unviable, it cannot be considered sound.

This may well be a reflection of the significant mitigation required to address constraints that are in addition to those that might normally be expected :

- the provision of access from the existing roundabout onto the A30 (Stockbridge Road East) would need upgrading to accommodate a fourth arm (as confirmed by HCC highways in Appendix 3 of the DSSS);
- the need to include a new pedestrian crossing to be located at the A30 linking the site to the village (as confirmed in the Policy);
- archaeological assessment and investigations will be required to assess the sites archaeological interest in advance of any design proposals (as confirmed in the Policy);
- completion of a noise assessment and provide appropriate mitigation to prevent excessive disturbance to the residential development from the nearby service station and major roads (as confirmed by the Policy); and
- ensuring that the amenity of the two existing detached dwellings is suitably safeguarded.

Summary

The Reg 19 Plan does not meet the tests of soundness as set out in paragraph 35 of the NPPF.

- it provides an arbitrary and untested figure of 1,900 dwellings for meeting unmet needs from PfSH sub-region, of which it forms part, which are very significant;
- the anticipated delivery within the plan period from key allocations in Winchester are over-optimistic and as such cannot be considered positively prepared;
- there are specific instances where the IIRA scoring cannot be considered to assess reasonable alternatives and does not comply with the SEA regulations, and does not justify subsequent allocations; and

- the level of engagement and consultation with key stakeholders, the Parish Council and local community in Wonston Parish has neither been sufficient or effective and does not comply with SEA regulations.

My client's land interests at Wonton Road, Sutton Scotney should be allocated for a mix use development of residential and open space to address these shortcomings. Had the site been assessed fairly and reasonably as part of the evidence base and had sufficient and detailed consultation taken place with the local community and key stakeholders at the appropriate time, it is considered that a more than likely outcome would have identified my client's land interest for allocation.

In addition to the provision of integrated and dedicated public open space, there is also an option for an extension to the adjacent village hall car park to provide additional spaces or turning facilities, as understood to be sought by the Parish Council. There is also potential for bio-diversity net gain and/or nutrient mitigation. The residential development area would have capacity to accommodate 50-60 dwellings at an appropriate density and within a development area that is wholly outside Flood Zone 2 and 3 and surface water flooding areas. Suitable planting can be provided to supplement existing tree clusters along the southern boundary to aid containment from the wider landscape.

Yours sincerely



Simon Packer
Director

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Appendix 1 – Land south of Wonston Road Site Constraints and Opportunities Plan



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- KEY**
- Site Boundary (Circa 50-60 Homes)
 - Public Rights of Way (PROW)
 - Existing Watercress Way Route
 - Potential New Connection to Watercress Way
 - Potential Vehicular Access
 - Potential Pedestrian Access
 - Potential Pedestrian Route within Site
 - Additional Pedestrian Link to Site
 - Provision of New Pedestrian Crossing
 - Additional Route to Gratton Recreational Ground
 - Existing Trees
 - Bus Stops
 - Development Area
 - Open Space area with opportunities for Play Space, Allotments or a Park
 - Potential for Coach Parking/ Turnaround Area
 - SUDs
 - Brightland Site (Circa 90 Homes)

CLIENT:
 Hathor Property Ltd.

PROJECT:
 Land south of Wonston Road, Sutton Scotney

DRAWING:
 Opportunities Plan

PROJECT NUMBER:
 3005

DRAWING NUMBER: 3001 **CHECKED BY:** KR/JN

REVISION: 00 **STATUS:** Final

DATE:
 September 2024

Appendix 2 – Landscape and Visual Assessment (LVIA Ltd)

WONSTON ROAD, SUTTON SCOTNEY

LANDSCAPE AND VISUAL APPRAISAL

Prepared on behalf of

Hathor Property

HAT1530lva



Placing development well

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Landscape and Visual Appraisal	
Project:	Wonston Road, Sutton Scotney
Status:	Final
Date:	October 2024
Author:	JPF
File Reference	HAT1530lvia
Revision	-

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1.0 Executive Summary

- i. LVIA Ltd were instructed to undertake a landscape and visual appraisal for a site located at Wonston Road by Antler Homes in June 2023. The site and its surrounding landscape were assessed and a total of seven viewpoints were selected to represent a variety of receptors in the surrounding area.
- ii. The aim of this report is to provide an assessment of the potential landscape and visual effects of a proposed development upon the receiving landscape, in line with current legislation and guidance. It comprises two main assessments, the first for landscape and the second for visual effects.
- iii. The assessment has been conducted in line with published best practice guidelines and includes a desk study; (review of local plan policies, published landscape character assessment and production of a computer generated Zone of Theoretical Visibility (ZTV)) and onsite observations.
- iv. The site is currently formed by part of a larger field in marginal agricultural use that is bound by a combination of hedgerows with trees, linear woodland, copses and open boundaries in places along its south. Existing built form sits to the east at Wonston Close, north at Wonston Road and west of the site at Winchester Hill. This development forms a 'pocket' in which the site sits. Within the site the field is gently undulating. The site falls within no areas of national designation related to landscape.
- v. Due to the existing local area, the proposed scheme would not be out of character with its surroundings when considered as part of the wider landscape with development of a similar nature in close proximity to the site to the north, east and west.
- vi. Mitigation measures have been suggested to aid the schemes visual blending with the existing environs.
- vii. Seven viewpoints were considered and of these two were considered to be subject to material visual impacts, viewpoints 3 and 4 from the car park of Victoria Hall and a short section of footpath 256/7/1.
- viii. With the implementation of a successful mitigation strategy, the overall impact on the landscape is considered to have a minor overall effect on the surrounding landscape character and a moderate effect on the visual baseline. It should be considered that this type of development is not out of character within the receiving landscape.

2.0 Introduction

- 2.1.1 LVIA Ltd were commissioned by Hathor Property in October 2024, to carry out a landscape and visual appraisal of the proposed development site located at Wonston Road, Sutton Scotney.
- 2.1.2 The brief was to assess the likely landscape and visual impact of the development and identify the degree of change over the existing use and site conditions.
- 2.1.3 The field survey was carried out during October 2024, and all viewpoints were chosen from publicly accessible vantage points.
- 2.1.4 Particular attention was paid to the potential views of receptors of high sensitivity, e.g. users of Public Rights of Way (PRoW).
- 2.1.5 Landscape and visual impact assessments can be defined as a mechanism by which the landscape can be assessed against its capacity to accommodate change. The aim of this report is to provide an assessment of the potential landscape and visual effects of the proposed development upon the receiving landscape, in line with current legislation and guidance.

The Site

- 2.1.6 The site is accessed from Wonston Road and the proposals are for a residential scheme with associated landscaping.
- 2.1.7 The site is currently formed by part of a larger field in marginal agricultural use that is bound by a combination of hedgerows with trees, linear woodland, copses and open boundaries in places along its south. Existing built form sits to the east at Wonston Close, north at Wonston Road and west of the site at Winchester Hill. This development forms a 'pocket' in which the site sits. Within the site the field is gently undulating. The site falls within no areas of national designation related to landscape.

3.0 Methodology

- 3.1.1 In conjunction with the landscape survey and assessment of the study area, a detailed visual survey has been undertaken in order to assess any potential visual impact of the development. In order to evaluate what the visual impact of the development will be and what can be done to ameliorate the impact, it is necessary to describe the existing situation to describe a basis against which any change can be assessed.
- 3.1.2 As a matter of best practice the assessment has been undertaken in accordance with the advisory guidelines set out in the document - “Guidelines for Landscape & Visual Impact Assessment – Third Edition”, published by The Landscape Institute and Institute of Environmental Assessment (2013).
- 3.1.3 The landscape assessment includes a baseline study that describes, and evaluates the existing landscape and visual resources, focusing on their sensitivity and ability to accommodate change.
- 3.1.4 The prime objective is to minimise the potential impact of the development by minimising the potential for visual impact wherever possible.
- 3.1.5 Information regarding the site and surroundings was gathered from Ordnance Survey maps, aerial photographs and on-site observations.
- 3.1.6 In order to assist in the assessment of the potential visual effects of any development, a computer-generated Zone of Theoretical Visibility (ZTV) has been modelled. The computer ZTV is used as a working tool to inform the assessment team of the extent of the zone within which the proposed development may have an influence or effect on landscape character and visual amenity and the areas within which the study area together with site survey work should be concentrated. It should be noted that this is a topographical information based exercise with no account being taken of the potential effects of vegetation or buildings on views.
- 3.1.7 Landscape has two separate but closely related aspects; firstly is the impact on the character of the landscape which includes responses that are felt toward the combined effect of the development. The significance of this will depend partly on the number of people affected and also on the judgements about how much the changes will matter in relation to the human senses of those concerned. Secondly, visual impact, in contrast to landscape character, is perhaps less prone to being subjective. Visual impact may occur by means of intrusion and/or obstruction, where visual intrusion is impact on the view without blocking it and visual obstruction is impact on a view that would be hidden by the development.

Table 1: Landscape Quality (or Condition)

Landscape Quality (or Condition)	Typical Indicators
Very High	All landscape elements remain intact and in good repair. Buildings are in local vernacular and materials. No detracting elements are evident
High	Most landscape elements remain intact and in good repair. Most buildings are in local vernacular and materials. Few detracting elements are evident
Medium	Some landscape elements remain intact and in good repair. Some buildings are in local vernacular and materials and some detracting elements are evident
Low	Few landscape elements remain intact and in good repair. Few buildings are in local vernacular and materials. Many detracting or incongruous elements are evident
Very Low	No landscape elements remain intact and in good repair. Buildings are not in local vernacular and materials. Detracting or incongruous elements are much in evidence

Table 2: Landscape Value

Landscape Value	Typical Indicators
Very High	Areas comprising a clear composition of valued landscape components in robust form and health, free of disruptive visual detractors and with a strong sense of place. Areas containing a strong, balanced structure with distinct features worthy of conservation. Such areas would generally be internationally or nationally recognised designations, such as Areas of Outstanding Natural Beauty (AONB).
High	Areas primarily containing valued landscape components combined in an aesthetically pleasing composition and lacking prominent disruptive visual detractors. Areas containing a strong structure with noteworthy features or elements, exhibiting a sense of place. Such areas would generally be national statutorily designated areas. Such areas may also relate to the setting of internationally or nationally statutory designated areas, such as AONB.
Medium	Areas primarily of valued landscape components combined in an aesthetically pleasing composition with low levels of disruptive visual detractors, exhibiting a recognisable landscape structure. Such areas would generally be non-statutory locally designated areas such as Areas of Great Landscape Value.
Low	Areas containing some features of landscape value but lacking a coherent and aesthetically pleasing composition with frequent detracting visual elements, exhibiting a distinguishable structure often concealed by mixed land uses or development. Such areas would be commonplace at the local level and would generally be undesignated, offering scope for improvement.
Very Low	Areas lacking valued landscape components or comprising degraded, disturbed or derelict features, lacking any aesthetically pleasing composition with a dominance of visually detracting elements, exhibiting mixed land uses which conceal the baseline structure. Such areas would generally be restricted to the local level and identified as requiring recovery.

Table 3: Character Sensitivity

Character Sensitivity	Typical Indicators
Very High	<p>Landscape elements: Important elements of the landscape susceptible to change and of high quality and condition.</p> <p>Scale and Enclosure: Small-scale landform/land cover/ development, human scale indicators, fine grained, enclosed with narrow views, sheltered.</p> <p>Manmade influence: Absence of manmade elements, traditional or historic settlements, natural features and 'natural' forms of amenity parkland, perceived as natural 'wild land' lacking in man-made features, land use elements and detractors</p> <p>Remoteness and Tranquillity: Sense of peace, isolation or wildness, remote and empty, no evident movement.</p>
High	<p>Where, on the whole, indicators do not meet the Very High criteria but exceed those for Medium</p>
Medium	<p>Landscape elements: Important elements of the landscape of moderate susceptibility to change and of medium quality and condition.</p> <p>Scale and Enclosure: Medium-scale landform/land cover/ development, textured, semi-enclosed with middle distance views.</p> <p>Manmade influence: Some presence of man-made elements, which may be partially out of scale with the landscape and be of only partially consistent with vernacular styles.</p> <p>Remoteness and Tranquillity: some noise, evident, but not dominant human activity and development, noticeable movement.</p>
Low	<p>Where, on the whole, indicators do not meet the Medium criteria but exceed those for Very Low.</p>
Very Low	<p>Landscape elements: Important elements of the landscape insusceptible to change and of low quality and condition.</p> <p>Scale and Enclosure: Large-scale landform/land cover/ development, Featureless, coarse grained, open with broad views.</p> <p>Manmade influence: Frequent presence of utility, infrastructure or industrial elements, contemporary structures e.g. masts, pylons, cranes, silos, industrial sheds with vertical emphasis, functional man-made land-use patterns and engineered aspects.</p> <p>Remoteness and Tranquillity: Busy and noisy, human activity and development, prominent movement.</p>

Table 4: Landscape Visual Sensitivity

Landscape Visual Sensitivity	Typical Indicators
Very High	Visual interruption: Flat or gently undulating topography, few if any vegetative or built features. Nature of views: Densely populated, dispersed pattern of small settlements, outward looking settlement, landscape focused recreation routes and/or visitor facilities, distinctive settings, gateways or public viewpoints.
High	Where, on the whole, indicators do not meet the Very High criteria but exceed those for Medium.
Medium	Visual interruption: Undulating or gently rolling topography, some vegetative and built features. Nature of views: Moderate density of population, settlements of moderate size with some views outwards, routes with some degree of focus on the landscape.
Low	Where, on the whole, indicators do not meet the Medium criteria but exceed those for Very Low.
Very Low	Visual interruption: Rolling topography, frequent vegetative or built features. Nature of views: Unpopulated or sparsely populated, concentrated pattern of large settlements, introspective settlement, inaccessible, indistinctive or industrial settings.

Table 5: Definition of Magnitude of Landscape Impacts

Magnitude	Description
Large	Total loss of or major alteration to key valued elements, features, and characteristics of the baseline or introduction of elements considered being prominent and totally uncharacteristic when set within the attributes of the receiving landscape. Would be at a considerable variance with the landform, scale and pattern of the landscape. Would cause a high quality landscape to be permanently changed and its quality diminished.
Medium	Partial loss of or alteration to one or more key elements, features, characteristics of the baseline or introduction of elements that may be prominent but may not be considered to be substantially uncharacteristic when set within the attributes of the receiving landscape. Would be out of scale with the landscape, and at odds with the local pattern and landform. Will leave an adverse impact on a landscape of recognised quality.
Small	Minor loss or alteration to one or more key elements, features, characteristics of the baseline or introduction of elements that may be prominent but may not be uncharacteristic when set within the attributes of the receiving landscape. May not quite fit into the landform and scale of the landscape. Affect an area of recognised landscape character
Negligible	Very minor loss or alteration to one or more key elements, features, and characteristics of the baseline or introduction of elements that are not uncharacteristic when set within the attributes of the receiving landscape. Maintain existing landscape quality, and maybe slightly at odds to the scale, landform and pattern of the landscape.

3.1.8 'Material' landscape effects would be those effects assessed to be major or major/moderate and are indicated by shading in the following table.

Table 6: Significance of Landscape Effects

Magnitude	Sensitivity				
	Very High	High	Medium	Low	Very Low
Large	Major	Major	Major/ moderate	Moderate	Moderate/ minor
Medium	Major	Major/ moderate	Moderate	Moderate/ minor	Minor/ negligible
Small	Moderate	Moderate/ minor	Minor	Negligible	Negligible
Negligible	Minor/ moderate	Minor	Minor/ negligible	Negligible	Negligible

3.1.9 The prediction and extent of effect cannot always be absolute. It is for each assessment to determine the assessment criteria and the significance thresholds, using informed and well-reasoned professional judgement supported by thorough justification for their selection, and explanation as to how the conclusions about significance for each effect assessed have been derived, as noted in GLVIA 3rd edition para 2.23-2.26 and 3.32-36.

3.1.10 In order to determine the magnitude of impact for any critical viewpoints of the subject site, whether in the immediate locality or further afield, the assessment of visual impact takes into account the;

- Sensitivity of the views and viewers (visual receptor) affected;
- Extent of the proposed development that will be visible;
- Degree of visual intrusion or obstruction that will occur;
- Distance of the view;
- Change in character or quality of the view compared to the existing.

3.1.11 The locations from which the proposed development will be visible are known as ‘visual receptors’. For the purposes of a visual assessment the visual receptors would be graded according to their sensitivity to change.

Table 7: Visual Receptor Sensitivity

Receptor Sensitivity	Description
High	<p>Occupiers of residential properties.</p> <p>Users of outdoor recreational facilities, including public rights of way, whose attention or interest may be focused on the landscape</p> <p>Communities where the development results in changes in the landscape setting or valued views enjoyed by the community.</p>
Medium	<p>People travelling through or past the affected landscape in cars, on trains or other transport routes where higher speeds are involved and views sporadic and short-lived.</p> <p>People engaged in outdoor recreation where enjoyment of the landscape is incidental rather than the main interest.</p>
Low	<p>People at their place of work, Industrial facilities.</p>

Table 8: Definition of Magnitude of Visual Impact

Magnitude	Description
Very Large	<p>The development would result in a dramatic change in the existing view and/or would cause a dramatic change in the quality and/or character of the view. The development would appear large scale and/or form the dominant elements within the overall view and/or may be in full view the observer or receptor.</p> <p>Commanding, controlling the view.</p>
Large	<p>The development would result in a prominent change in the existing view and/or would cause a prominent change in the quality and/or character of the view. The development would form prominent elements within the overall view and/or may be easily noticed by the observer or receptor.</p> <p>Standing out, striking, sharp, unmistakable, easily seen.</p>
Medium	<p>The development would result in a noticeable change in the existing view and/or would cause a noticeable change in the quality and/or character of the view. The development would form a conspicuous element within the overall view and/or may be readily noticed by the observer or receptor.</p> <p>Noticeable, distinct, catching the eye or attention, clearly visible, well defined.</p>
Small	<p>The development would result in a perceptible change in the existing view, and/or without affecting the overall quality and/or character of the view. The development would form an apparent small element in the wider landscape that may be missed by the observer or receptor.</p> <p>Visible, evident, obvious.</p>
Very Small	<p>The development would result in a barely perceptible change in the existing view, and/or without affecting the overall quality and/or would form an inconspicuous minor element in the wider landscape that may be missed by the observer or receptor.</p> <p>Lacking sharpness of definition, not obvious, indistinct, not clear, obscure, blurred, indefinite.</p>
Negligible	<p>Only a small part of the development would be discernible and/or it is at such a distance that no change to the existing view can be appreciated.</p> <p>Weak, not legible, near limit of acuity of human eye.</p>

Table 9: Significance of Visual Effects

Magnitude	Sensitivity		
	High	Medium	Low
Very large	Major	Major	Major/moderate
Large	Major	Major/moderate	Moderate
Medium	Major/moderate	Moderate	Moderate/minor
Small	Moderate	Moderate/minor	Minor
Very Small	Minor	Minor	Negligible
Negligible	Negligible	Negligible	Negligible

(Shaded areas show material effects)

4.0 Landscape Baseline

Landscape Baseline

- 4.1.1 The overall landscape character of the site and its surroundings can be determined as the result of the relationship between landform, land cover, landscape elements and climate.
- 4.1.2 An Approach to Landscape Character Assessment which was published by Natural England in 2014 offers five key principles of Landscape Assessment at paragraph 1.4. These are given as:
- Landscape is everywhere and all landscape and seascape has character;
 - Landscape occurs at all scales and the process of Landscape Character Assessment can be undertaken at any scale;
 - The process of Landscape Character Assessment should involve an understanding of how the landscape is perceived and experienced by people;
 - A Landscape Character Assessment can provide a landscape evidence base to inform a range of decisions and applications;
 - A Landscape Character Assessment can provide an integrating spatial framework – a multitude of variables come together to give us our distinctive landscapes.
- 4.1.3 The site falls within national character area (NCA) 130 – Hampshire Downs; as defined by Natural England in their nationwide assessment.
- 4.1.4 The key characteristics of NCA 130 are defined as (points of relevance to the site and its context are highlighted for clarity):
- The rolling, elevated, chalk arable downland has an open, exposed character that provides open skies and long-distance views.
 - Elevated plateaux and upper valley slopes are characterised by extensive open tracts of large, low-hedged fields with thin chalky soils, shelterbelts, and ancient semi-natural woodland blocks on clay-with flint caps on some of the steeper slopes.
 - In contrast, within the sheltered valleys and to the east of the area, **the network of hedgerows, interspersed by numerous areas of oak/ash or hazel woodland coppice and smaller meadow fields, gives a strong sense of enclosure.**
 - The rivers and streams of the Test and Itchen catchments are internationally significant, and distinctive chalk rivers, running in deep valleys, cut into the Chalk.
 - A network of distinctive and ancient droving roads and trackways is a particular feature across the Downs.
 - There is widespread evidence of prehistoric settlement on the open downlands, including burial mounds with visually prominent ironage hill forts. In the valleys, there is evidence of Roman estates and nucleated medieval village settlement patterns, and fieldscapes and farmsteads across the downlands evidence the gradual and planned enclosure from the medieval period.
 - The area's distinctive appearance derives from the use of chalk cob (in the west), weatherboarded timber frame and small, handmade local brick with flint in traditional

rural buildings and walls surrounding farm courtyards, with thatch surviving in many places.

- The settlement pattern varies between the relatively dense strings of villages along the lower river valleys and the very low-density, nucleated settlements in the upper reaches of the rivers and on the Downs.
- The ancient city of Winchester is located at the heart of this landscape and at the centre of the Itchen Valley, and the more modern, rapidly expanding towns of Basingstoke and Andover are on downland sites at the head of the Loddon and Test valleys.

4.1.5 The NCA 130 covers a relatively wide and diverse area. The site and its context exhibit very few of the key characteristics of the NCA, predominantly only where they relate to the network of hedgerows that form enclosure. This lack of close relation to the key characteristics is to be expected due to the relatively large scale of the national character area.

Sub-Regional Character

The Hampshire Integrated Character Assessment (HICA)

4.1.6 The HICA were published to provide the baseline study of the landscape character, at a sub-regional level that gives a further understanding of the landscape resource.

4.1.7 The site falls within Landscape Character Area (LCA) 3B: Test Valley.

4.1.8 The LCA key characteristics of relevance to the study area are reproduced below (points of relevance to the site and setting are shown highlighted in bold text):

- Chalk geology in the north changing to lower lying Tertiary Clays/Plateau Gravels in the south.
- Steep abrupt valley sides becoming gentler further south, long tributaries extending deep into the chalk hinterland.
- Clear alkaline nutrient rich spring water supporting a rich biodiversity and nationally designated riverine, wetland, grassland, and woodland habitats.
- Generally meandering and braided river course bordered by luxuriant riverine vegetation, reedbeds, marshes and former water meadows.
- Unimproved grazed floodplain meadows, arable production on valley terraces, pasture and arable on valley sides.
- Floodplains with no obvious field pattern and overlapping vegetation comprising individual trees, remnant hedgerows and small carr woodlands.
- Valley sides have a range of different enclosure patterns and scales with fields defined by hedgerow and hedgerow trees.
- Generally unspoilt, remote and tranquil except for urban influences and noise intrusion close to major towns and roads.
- Generally winding roads and lanes following the edge of the valley floor.

- Intact historic village morphology little altered by 20th C development and significant concentration of use of cob as a building material.
- Small settlements in main valley and tributaries and very lightly populated chalk surroundings contrast in the south with the urban setting beyond the valley edge of Totton and Southampton.
- Views limited to valley floor but good views across and along the valley from open parts of the valley sides.

4.1.9 The site and its context exhibit very few or none of the key characteristics of LCA 3B. This lack of representation is likely due to the site's location within the marginal agricultural settlement fringe.

Winchester County Council Landscape Character Assessment (WCLCA)

4.1.10 The WCLCA provide analysis of the landscape baseline and resource.

4.1.11 The site falls within LCA 4: Wonston Downs but sits close to its boundary with the settlement of Sutton Scotney.

4.1.12 The LCA 4 key characteristics of relevance to the study area are reproduced below (points of relevance to the site and setting are shown highlighted in bold text):

- Gently sloping and undulating topography, forming a relatively low-lying area of downland (50-110m OD).
- Well-drained upper chalk geology, with minor deposits of clay with flints.
- Arable farmland predominates within the area, consisting of medium to large fields, many with straight boundaries enclosed by formal agreement in the 18th and 19th centuries, followed by 20th century boundary loss. These field patterns also include an area of regular ladder fields south of Sutton Scotney.
- The habitats and species of greatest importance in this character area are associated with the arable farmland, including the stone curlew.
- Woodland within the landscape character area is sparse and largely consists of 19th century plantation and **shelterbelts**, except for Bazeley Copse which is semi-natural ancient woodland, typically consisting mainly of oak, ash, hazel and field maple.
- The remnant downland at Worthy Down, south west of South Wonston is diverse calcareous grassland, supporting a distinctive vegetation community.
- A visually open and expansive landscape with long, panoramic views over the downs. Key views are towards Winchester and over the Dever Valley.
- The South Wonston water tower is a key landmark within the character area.
- A widely spaced network of straight roads, lanes and tracks providing access to the farms, together with a limited rights of way system and public access. Some busy routes pass through the area, including the Andover Road and the A34, originally Roman roads, and the railway.

- The area itself is relatively sparsely populated; the main settlement being South Wonston. However, the influence of Winchester and Kings Worthy to the south and the intrusion of the main roads create a more populated feel.
- South Wonston has a strong linear structure originating from the turn of the 20th Century, when the local farmland was sold for development in one-acre plots. Other settlements consist mainly of farmsteads and associated cottages.
- The most notable historic features of this character area are the drove roads, which predominantly run in an east west direction and connected Salisbury with Alresford and Alton, for moving animals and more latterly as a route for gypsy hop-pickers. Also, numerous pre-historic barrows are characteristic of the area.

4.1.13 The site and its context exhibit very few of the key characteristics of LCA 4. These are limited to the mention of the shelterbelts that sit locally to the site.

Landscape Sensitivity

4.1.14 The site is currently formed by part of a larger field in marginal agricultural use that is bound by a combination of hedgerows with trees, linear woodland, copses and open boundaries in places along its south. Existing built form sits to the east at Wonston Close, north at Wonston Road and west of the site at Winchester Hill. This development forms a 'pocket' in which the site sits. Within the site the field is gently undulating. The site falls within no areas of national designation related to landscape.

4.1.15 Road noise can be heard within the site from nearby roads, such as Wonston Road and Winchester Hill and the car park of Victoria Hall and existing adjacent residential development that sits around the site has some visual interconnectivity with the site.

4.1.16 The area contains some features of landscape value, mainly situated around the site boundary but lacks a coherent composition. The landscape elements within the area are commonplace at the local level and are of varying quality. There is frequent presence of manmade elements and road noise and human activity is noticeable. Frequent vegetative and built features create enclosure. The site sits within a partial 'pocket' of built development formed by the existing settlement edge.

4.1.17 Due to the context formed by the receiving landscape, the susceptibility to change is considered to be medium and the value is considered to be medium. The overall sensitivity of the landscape is considered to be medium.

4.1.18 The proposal would be consistent with the current landscape character of the site and its surrounding context. With a successful mitigation strategy, the proposal would further integrate with its setting.

5.0 Visual Baseline

Limits to study Area

- 5.1.1 The limits to the study area have been determined by the visual envelope of the development site. This area has been adopted as the main study area, as it surrounds the site and may be considered likely to be most impacted by physical change.
- 5.1.2 In order to assist in the assessment of the potential visual effects of any development, a computer-generated Zone of Theoretical Visibility (ZTV) has been modelled. The computer ZTV is used as a working tool to inform the assessment team of the extent of the zone within which the proposed development may have an influence or effect on landscape character and visual amenity and the areas within which the study area together with site survey work should be concentrated. It should be noted that this is a topographical information based exercise with no account being taken of the potential effects of vegetation or buildings acting as a visual barrier. The ZTV is shown in Figure 3: Zone of Theoretical Visibility.
- 5.1.3 The initial study area was set to a radius of approximately 2.5km from the centre of the site (approximately N51°09'06, W01°20'12) on the basis that at this distance, this form of development, when seen by the human eye, would be hardly discernible or not legible.
- 5.1.4 Viewpoints have been detailed in table 10: Viewpoint Details which outlines location and rationale for selection.

Table 10: Viewpoint Details

No	Location	Distance (km) and direction of view	Northing	Westing	Sensitivity of Visual Receptor
1	Wonston Road at junction with Station Drive	0.02, S	51°09'08	01°20'10	Medium – road users
2	Wonston Road	0.01, SE	51°09'08	01°20'16	Medium – road users
3	Victoria Hall car park	0.02, SE	51°09'07	01°20'17	Medium – road users
4	Footpath 256/7/1	0.08, N	51°09'01	01°20'13	High - users of PRoW
5	Footpath 256/7/1	0.33, N	51°08'53	01°20'10	High - users of PRoW
6	Footpath 256/7/1	0.53, NW	51°08'49	01°19'57	High - users of PRoW
7	Winchester Hill	0.77, NE	51°08'41	01°20'31	High - users of PRoW

Views to the site

- 5.1.5 It is clear that, despite the study area being potentially visible from a wide variety of locations, at varying distances and from a limited number of private and public areas, the visual envelope is actually quite limited.
- 5.1.6 The visibility of the site is dependent on a range of factors, including location of viewpoint, distance of view, the angle of the sun, time of year and climatic conditions. Of equal importance will be whether the site is seen completely or in part of the skyline, where land provides a backcloth and where there is a complex foreground or an expansive landscape surrounding the view. The aspect of dwellings and whether it is a main view or one from a secondary window less frequently used is also a consideration.
- 5.1.7 A photographic study of the site has been undertaken. The viewpoints are at varying distances from the site and have been selected to represent potential views seen by the most sensitive receptors from around the site.
- 5.1.8 The site visit has been undertaken during the summer months when vegetation has its foliage and is acting as dense visual barriers. In months when vegetation has lost its foliage, it will act as less dense visual barriers.
- 5.1.9 The sensitivity of most of the local receptors is assessed as either high or medium as shown in table 7: Visual Receptor Sensitivity.
- 5.1.10 For the field assessment, a Canon EOS 500D camera with an 18-55mm lens was used, set at 35mm focal length. This is in line with best practice as shown in the Visual Representation of Development Proposals technical guidance note issued by the Landscape Institute (Technical Guidance Note 06/19).
- 5.1.11 The site was visited on the 8th of October 2024; the weather was bright and clear.

Viewpoint 1: View from Wonston Road at junction with Station Drive



Vp1	Panoramic View	<i>(Distance 0.02km looking south)</i>
Baseline Description	This is a view from Wonston Drive at the junction of Station Drive looking south towards the proposed site. Wonston road is bound by a hedgerow with trees which creates enclosure to longer range views of the landscape to the south. Wonston Road is relatively busy and vehicular noise and movement is noticeable in the area.	
Predicted change	From this viewpoint, the proposals would be noticeable beyond the existing hedgerow with trees that follows the road and forms a partial visual barrier. The change would be read as part of the existing settlement edge elements that sit locally and would not appear alien or out of character.	
Type of effect	The introduction of the proposals would form a limited reduction in the quality of the present environment.	
Magnitude of Change	The development would result in a noticeable change in the view that would be noticed by an observer.	
Assessment	Sensitivity	Medium – Road users
	Magnitude	Medium
<i>Significance of Effect</i>		<i>Moderate – Not a material change</i>

Viewpoint 2: View from Wonston Road



Vp2	Panoramic View	(Distance 0.01km looking south east)
Baseline Description	This is a view from Wonston Road looking south east towards the proposed site. Wonston road is bound by a hedgerow with trees to the south which creates enclosure to longer range views of the landscape. Fencing that forms the boundary of Victoria Hall car park can be seen alongside a pumping station and related engineering. Wonston Road is relatively busy and vehicular noise and movement is noticeable in the area.	
Predicted change	From this viewpoint, the proposals would be noticeable beyond the existing hedgerow with trees that follows the road and forms a partial visual barrier. The change would be read as part of the existing settlement edge elements that sit locally and would not appear alien or out of character.	
Type of effect	The introduction of the proposals would form a limited reduction in the quality of the present environment.	
Magnitude of Change	The development would result in a noticeable change in the view that would be noticed by an observer.	
Assessment	Sensitivity	Medium – Road users
	Magnitude	Medium
<i>Significance of Effect</i>		<i>Moderate – Not a material change</i>

Viewpoint 3: View from Victoria Hall car park



Vp3	Panoramic View	<i>(Distance 0.02km looking south east)</i>
Baseline Description	This is a view from Victoria Hall car park looking south east towards the proposed site. The car park is enclosed by a hedgerow with trees to the south which creates a filter to views of the landscape to the south. A landscape in agricultural use that is enclosed by mature vegetation can be perceived beyond the vegetation. A barn structure sits to the south west of the car park area. The car park has lighting columns within it that allow use of the area during dark hours.	
Predicted change	From this viewpoint, the proposals would be easily seen beyond the trees that form a visual filter of the landscape beyond. Although the change would be unmistakable, it would be seen from an area that is related to the settlement fringe which is lit during dark hours, with built form noticeable.	
Type of effect	The introduction of the proposals would form a reduction in the quality of the present environment.	
Magnitude of Change	The development would result in an easily seen change in the view that would be easily noticed by an observer.	
Assessment	Sensitivity	Medium – Road users
	Magnitude	Large
<i>Significance of Effect</i>		Major/moderate – A material change

Viewpoint 4: View from footpath 256/7/1



Vp4	Panoramic View	<i>(Distance 0.08km looking north)</i>
Baseline Description	This is a view from footpath 256/7/1 looking north towards the proposed site. This section of the footpath crosses a field in agricultural use that is defined by mature vegetation. Within the field a handful of small copses can be seen. The existing residential built form that sits along Wonston Road and Wonston Close can be seen through the vegetative visual filter created by this boundary vegetation to the north and north east. Land used in allotment or small holding agriculture can be seen to the north west defined by fencing.	
Predicted change	From this viewpoint, the proposals would be easily seen within the field in the foreground but seen clearly in the context of the existing settlement fringe development that is situated in close proximity to the site along Wonston Road and Wonston Close.	
Type of effect	The introduction of the proposals would form a reduction in the quality of the present environment.	
Magnitude of Change	The development would result in an easily seen change in the view that would be easily noticed by an observer.	
Assessment	Sensitivity	High – Users of PRow
	Magnitude	Large
<i>Significance of Effect</i>		Major – A material change

Viewpoint 5: View from footpath 256/7/1 – 0.33km looking north



Viewpoint 6: View from footpath 256/7/1 – 0.53km looking north west



Vps 5 & 6		Panoramic Views
Baseline Description	These are views from a section of footpath 256/7/1 looking towards the site. The footpath follows the field boundary that is formed by a mature hedgerow with trees that defines a gently undulating field in agricultural use in the foreground. The local fields are enclosed by mature vegetation which creates visual barriers to view to the north, although in some locations close to viewpoint 6 the existing residential dwellings situated at Harding Close are visible set within the well vegetated landscape fabric. Telegraph poles cross the landscape forming manmade elements with a vertical emphasis on views.	
Predicted change	From these viewpoints, the proposals will sit beyond the mature hedgerow with tree that encloses the field in the foreground to then north along Beggars Drove and to its west. This existing landscape feature creates a dense visual barrier to potential change. However, from the location of viewpoint 5 there will be a barely perceptible change that will be indefinite in views.	
Type of effect	The introduction of the proposals would form a neutral change in the quality of the present environment.	
Magnitude of Change	The development would result in a barely perceptible change in the view that would be indefinite to an observer and that would not affect the overall quality of views.	
Assessment	Sensitivity	High – Users of PRoW
	Magnitude	Very small
Significance of Effect		Minor – Not a material change

Viewpoint 7: View from Winchester Hill



Vp7	Panoramic View	<i>(Distance 0.77km looking north east)</i>
Baseline Description	This is a view from Winchester Hill looking north east towards the proposed site. Winchester Hill is bound by a hedgerow which creates enclosure to views of the landscape beyond. Winchester Hill is relatively busy and vehicular noise and movement is noticeable in the area. Mature vegetation that forms the curtilage to The Old Dairy to the north can be seen forming a visual barrier to views further north. The landform rises steadily to the north. Telegraph poles cross the landscape forming manmade elements with a vertical emphasis on views.	
Predicted change	From this viewpoint, the proposals would not be discernible beyond the existing hedgerow that follows the road. It's important to note that this view would be experienced transitionally and seen from a moving vehicle.	
Type of effect	The introduction of the proposals would form a neutral change in the quality of the present environment.	
Magnitude of Change	The development would result in no discernible change in the view to an observer.	
Assessment	Sensitivity	Medium – Road users
	Magnitude	Negligible
Significance of Effect		<i>Negligible – Not a material change</i>

6.0 Characteristics of Proposal

- 6.1.1 The proposed development is for residential dwellings with associated landscaping with access from Wonston Road.
- 6.1.2 The construction of building elements, together with associated traffic, parking, lighting and security fencing can temporarily but substantially change the landscape character of an area and impact upon its existing visual and/or recreational amenity.
- 6.1.3 In order to minimise potential impacts, together with the optimum benefit for landscape character and visual amenity the proposals should provide environmental enhancement and make a positive contribution to the landscape, not only of the development itself, but to its wider setting. This should include visual barriers as close to the viewer as possible. Its principal objectives are to:
- Minimise views from residential areas
 - Assist visual integration of the development
 - Provide an internal site landscape structure and enhance internal road corridors
 - Reinforce the opportunity to maintain wildlife corridors at the site boundaries.
- 6.1.4 The initial construction phase will give rise to temporary, short term impacts. Any modifications or extensions that occur from time to time in the future will also give rise to this short term construction impact.
- 6.1.5 The site and its context has an overall weighted medium landscape sensitivity. This conclusion was reached in line with the definitions of landscape impact shown in tables 1 to 4 within this document.
- 6.1.6 The scale and nature of the proposal and its juxtaposition to other built form will have an overall weighted landscape impact that could be considered medium as they are not substantially uncharacteristic when set within the attributes of the existing landscape. This conclusion was reached in line with the definitions of landscape impact shown in table 5 within this document.
- 6.1.7 There will be a loss of part of an agricultural field and a section of hedgerow to allow access to the site.
- 6.1.8 The overall weighted level of landscape effect can be considered moderate (i.e. not a material change).
- 6.1.9 The visual impact and the significance of the impacts of the development on the open countryside have been assessed as potentially major (i.e. a material change) without mitigation from viewpoints that cross the site along footpath 256/7/1 as can be expected. However, these effects will only be experienced from a short range due to the well vegetated nature of the surrounding landscape.
- 6.1.10 The visual change from the local landscape is generally localised and limited due to the mature vegetation that sits in the surrounding landscape and the similar setting of the receiving landscape.
- 6.1.11 There will likely be some level of intervisibility with dwellings that sit close to the site boundary such as those at Wonston Road.

6.1.12 Measures have been recommended to further reduce these impacts and these are located in section 7.0: Mitigation.

7.0 Mitigation

7.1.1 Mitigation measures would include:

- Management and retention of the native tree and hedgerows that sit around the site boundary;
- Additional ornamental planting within residential frontages to encourage year round interest and pollinators;
- The heights of built form to reflecting that of the surrounding dwellings;
- Built form set back from boundaries to allow growth of boundary vegetation;
- Additional mixed native species planting along the sites southern boundary to link the existing copse and boundary hedgerow. This will form an additional green infrastructure link and replace a previous hedgeline;
- The use of materials for the external envelope of the buildings which minimise potential visual intrusion and follow the local vernacular to aid visual blending.

7.1.2 With suitable mitigation measures, the development will have a moderate visual impact and a minor character impact (i.e. not a material change).

8.0 Conclusion

- 8.1.1 The scale and nature of the development and its juxtaposition to other existing residential development and the receiving settlement fringe will have a medium landscape character sensitivity and the magnitude of change is medium; therefore resulting in a level of landscape effect of moderate (i.e. not a material change).
- 8.1.2 The visual effects are generally localised and limited due in most part to dense intervening mature vegetation between the viewer and site, the topography in the area and the similar setting of the proposed scheme formed by local residential dwellings. However, from a short section of footpath 256/7/1 which crosses the site, the change will be easily seen.
- 8.1.3 For the proposed site and the surroundings during construction, an increase of delivery vehicles and people travelling to the works can be expected. These effects will be short lived however and will not require mitigation during the construction process.
- 8.1.4 The viewpoints assessed showed that although the site is at least partly visible from six of the seven assessed, only two of the assessed views can be considered subject to a material change, these are viewpoints 3 and 4 that sit within Victoria Hall car park and from a section of footpath 256/7/1 that crosses the site.
- 8.1.5 The majority of receptors in the local area can be considered of a high or medium sensitivity (users of PRow and road users). The visual impact of the development on the open countryside has been assessed, at worst case scenario, as major (i.e. a material change) from viewpoint 4 that sits close to the site's southern boundary. Other viewpoints offer limited views of the site due in most part to mature vegetation acting as visual barriers.
- 8.1.6 With suitable mitigation measures, the development will have a moderate visual impact and a minor/negligible impact (i.e. not a material change).

9.0 Appendices

Figure 1: Ordnance Survey Map

Figure 2: Aerial Photograph

Figure 3: Zone of Theoretical Visibility

Figure 4: Viewpoint Location Plan

Figure 5: Designation Plan



LEGEND



Site boundary



For ordnance survey map legend, refer to:
<https://www.ordnancesurvey.co.uk/docs/legends/25k-raster-legend.pdf>

Scheme: Wonston Road, Sutton Scotney

Drawing: Ordnance Survey Plan

Figure No: 1

LVIA Ltd Ref: HAT1530

Scale: NTS@A3

Drawn: SC

Checked: JPF





LEGEND



Site boundary



Image supplied by Google Maps
<https://maps.google.co.uk/>
 Accessed 08/10/24

Scheme: Wonston Road, Sutton Scotney

Drawing: Aerial Photograph

Figure No: 2

LVIA Ltd Ref: HAT1530

Scale: NTS@A3

Drawn: SC

Checked: JPF





LEGEND



Site boundary

Zone of theoretical visibility



Yellow wash - Potential view



Grey wash - No potential view

NB: Viewshed analysis run with 1.6m viewer height and buildings at a 8m height with mapinfo and represents surface topography, without taking into account potential visual barriers in the form of trees, hedgerows, woodland, buildings and other manmade elements.



Scheme: Wonston Road, Sutton Scotney

Drawing: Zone of Theoretical Visibility

Figure No: 3

LVIA Ltd Ref: HAT1530

Scale: NTS@A3

Drawn: SC

Checked: JPF





LEGEND



Site boundary



Viewpoint location

Zone of theoretical visibility



Yellow wash - Potential view



Grey wash - No potential view

NB: Viewshed analysis run with 1.6m viewer height and buildings at a 8m height with mapinfo and represents surface topography, without taking into account potential visual barriers in the form of trees, hedgerows, woodland, buildings and other manmade elements.



Scheme: Wonstone Road, Sutton Scotney

Drawing: Viewpoint Location Plan

Figure No: 4

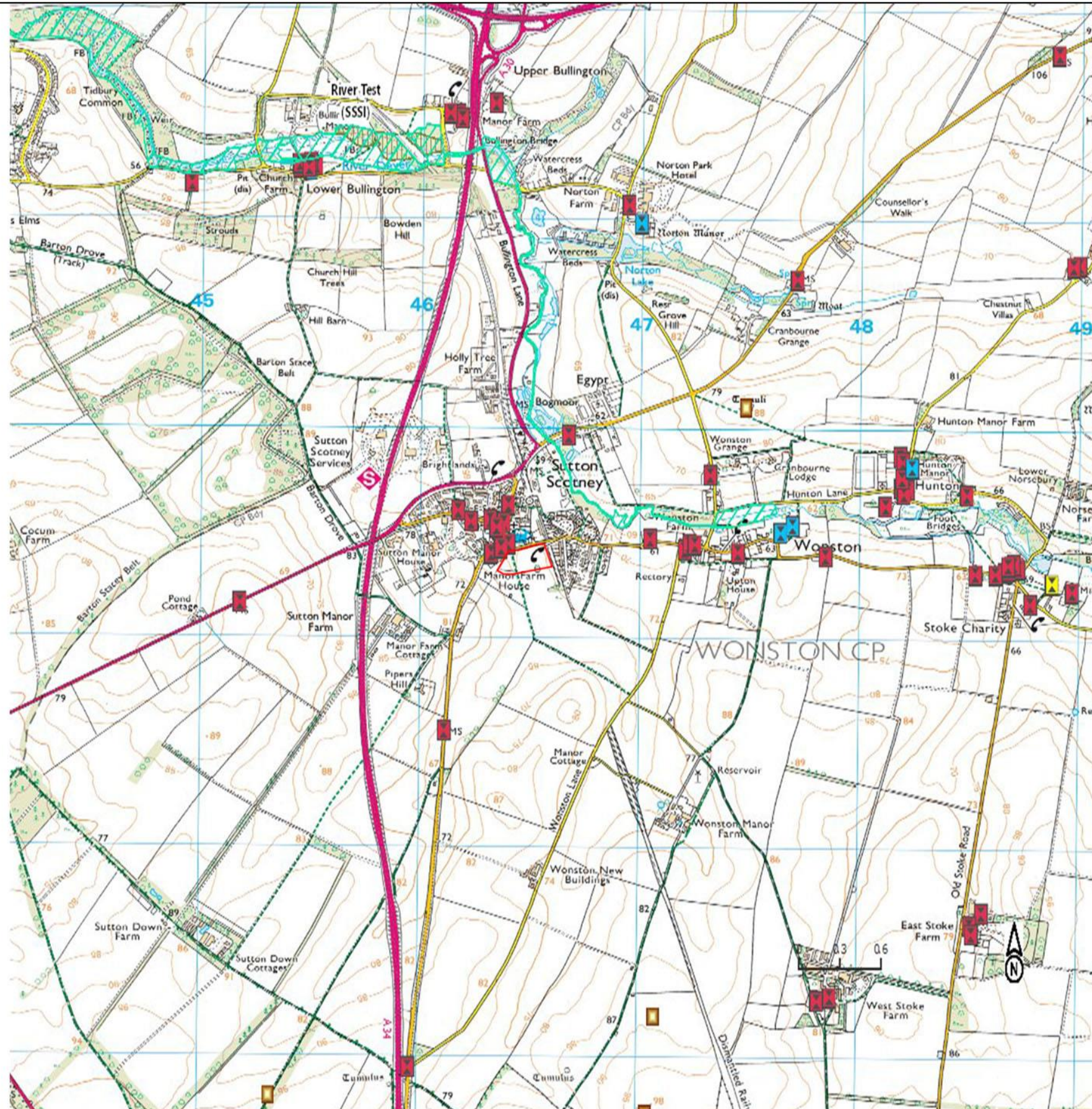
LVIA Ltd Ref: HAT1530

Scale: NTS@A3

Drawn: SC

Checked: JPF





LEGEND



Site Boundary

-  Sites of Special Scientific Interest (England)
-  Scheduled Monuments (England) - points
- Listed Buildings (England)**
-  I
-  II
-  II*
- Ancient Woodland (England)**
-  Ancient and Semi-Natural Woodland
-  Ancient Replanted Woodland



Scheme: Wonstone Road, Sutton Scotney

Drawing: Designations Plan

Figure No: 5

LVIA Ltd Ref: HAT1530

Scale: NTS@A3

Drawn: SC

Checked: JPF





Placing development well

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LANDSCAPE / TOWNSCAPE & VISUAL IMPACT ASSESSMENT | GREEN BELT ANALYSIS
PROJECT MANAGEMENT | EXPERT WITNESS | LANDSCAPE DESIGN & PLANNING
LANDSCAPE MANAGEMENT

Appendix 3 – Critical Assessment of Integrated
Impact Assessment Report – Sutton Scotney (Turley)

Critical Review of Integrated Impact Assessment Objectives : Comparative Assessment of Brightlands and Wonston Road, Sutton Scotney

August 2024

Turley

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Appendix 1 – Comparative Assessment Summary Table

Appendix 2 – Site W010: Land at Brightlands (North of A30), Sutton Scotney – IIRA Plan Extract

Appendix 3 – Site W011: Land South of Wonston Road, Sutton Scotney – IIRA Plan Extract

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Client
Hathor Property

Our reference
HATS3005

13 August 2024

1. Introduction

- 1.1 Hathor Property submitted representations to the Regulation 18 consultation on the Winchester Local Plan Review and a related submission to the Strategic Housing and Employment Land Availability Assessment (SHELAA), promoting land south of Wonston Road, Sutton Scotney for mixed residential and open space development.
- 1.2 At the Regulation 18 stage the Local Plan did not identify an allocation for residential development despite Sutton Scotney being an intermediate settlement within the settlement hierarchy where some housing would be expected to be provided. This was a consequence of drainage infrastructure capacity constraints which at the time were uncertain could be resolved.
- 1.3 However, in the interim period since publication of the Regulation 18 Plan, Southern Water have confirmed upgrade works are committed and will be completed within the early years of the plan period. Therefore the Council undertook an assessment of sites that had previously been promoted for their suitability as an allocation within Sutton Scotney.
- 1.4 The Council published a report detailing the Regulation 19 Plan and related evidence base to the Scrutiny Committee on 29th July 2024, seeking approval for consultation on this basis. This confirmed the proposed allocation of an alternative site in Sutton Scotney at Brightlands. The justification for the allocation is primarily set out within the Integrated Impact Assessment Report (IIRA), prepared by LUC on behalf of the Council.
- 1.5 This includes a detailed assessment of each site promoted through the Regulation 18 stage pre-mitigation against a series of key criteria (or '*framework of sustainability objectives*') as set out within the IIRA and subsequently scored accordingly. Only the draft allocated site Brightlands is assessed post mitigation.
- 1.6 As an aside, the Strategic Environmental Assessment Regulations requires likely significant effects of the draft Regulation 19 Plan, including draft allocations, to be evaluated as well as reasonable alternatives. As the IIRA only scores the draft allocated site with mitigation and consequently, it does not provide a fair or appropriate assessment of reasonable alternatives.
- 1.7 This report critically assesses this scoring as part of a comparative assessment of Brightlands (Site Reference WO10), and Wonston Road (Site Reference WO11), against these key criteria (note the IIRA excludes objective 3, 5 and 6 from individual site assessments as these were considered unlikely to be greatly influenced by the location of individual site options in the District, and these are also not assessed as part of this report). However, it is noted that Objective 5 includes key elements relating to integration with the existing settlement, community cohesion, and promoting pedestrian interaction, which arguably will be site specific.
- 1.8 This report is based on a site and context review and a review of key constraints. The assessment includes a scenario both pre and post mitigation. A summary table is included at Appendix 1 in a graphical form using a similar scoring approach comparable with that included within the IIRA.

2. Comparative Assessment

- 2.1 The key criteria/sustainability objectives are set out within Chapter 1 of the non-technical summary of the IIRA at paragraph 1.40, together with related key questions. These are considered in turn below against both sites both pre and post mitigation.
- 2.2 Table 1 of the Non-Technical summary includes a table setting out the scoring description. This is provided below for reference.

Symbol and colour coding	Description
++	Significant positive effect likely.
++/-	Mixed significant positive and minor negative effects likely.

Symbol and colour coding	Description
+	Minor positive effect likely.
+/-	Mixed minor effects likely.
++/--	Mixed significant effects likely.
-	Minor negative effect likely.
--/+	Mixed significant negative and minor positive effects likely.
--	Significant negative effect likely.
0	Negligible effect likely.
?	Likely effect uncertain.

IIA Objective 1: To minimise the District’s contribution to climate change through a reduction of greenhouse gas emissions from all sources and facilitate the aim of carbon neutrality by 2030

IIA 1.1: Promote energy efficient and water efficient design?

IIA 1.2: Encourage the provision and use of renewable energy infrastructure (particularly in areas not connected to mains gas supply)?

- 2.3 This is a matter of detailed design and layout considerations. Both sites could be developed to promote energy and water efficiency through design and layout. The scale of both sites would mean it unlikely that on-site renewable infrastructure could be provided.
- 2.4 Accordingly the scoring for both sites against these criteria will be similar both pre and post mitigation. The IIRA assessment for Brightlands lists this as minor negative pre mitigation and negligible effect post mitigation. This is considered reasonable and can equally be applied to Wonston Road.

IIA Objective 2: To reduce the need to travel by private vehicle in the District and improve air quality

IIA 2.1: Provide easy access to public transport provision and active travel networks, including those for walking and cycling?

IIA 2.2: Support development which is able to access town/district/local centres, services and facilities (e.g. shops, post offices, GPs, schools) and/or key employment areas via active travel networks and/or public transport?

IIA 2.3: Minimise increases in traffic in the Air Quality Management Areas within and adjoining the District?

Brightlands Assessment

- 2.5 The proposed draft allocation at Brightlands is separated from the main settlement of Sutton Scotney and related key facilities and services, including bus stops, by the A30 trunk road (Stockbridge Road West). Observationally, this does carry a reasonable degree of traffic including Heavy Goods Vehicles.
- 2.6 There are no footways to the north of the A30 carriageway, and to the south is an extensive verge with tree planting, beyond which is a footway. There are also no pedestrian islands or refuges, and there is a 3 arm roundabout on the A30 to the immediate south-east of the allocation with no pedestrian crossing facilities. It is reasonable to conclude that the A30 represents a barrier to connectivity.
- 2.7 Against this objective, the IIRA scores Brightlands as a minor negative effect without mitigation. This is considered to significantly underplay the negative influence the A30 will have as a barrier to 'easy walking and cycling' to public transport provision and local facilities and services, which are all located to the south. This would be more appropriately scored as a significant negative effect.
- 2.8 The IIRA scores Brightlands as a negligible effect post mitigation. This is a reflection of the draft allocation policy which includes criteria that require several measures to enhance pedestrian and cycle connectivity. Whilst this will improve connectivity, the need to physically cross the A30 or any trunk road is still considered would discourage walking and cycling. This is particularly the case with younger children where pre-school facilities within the village are similarly located to the south. Equally, older children and parents attending the nearest Primary School at South Wonston would also be less inclined to walk to the bus stop to use the bus service.
- 2.9 This is more appropriately scored as a minor negative effect post mitigation.

Wonston Road Assessment

- 2.10 Although the site at Wonston Road is separated from the main village by the Wonston Road itself, this is a minor road with very little traffic. There are also no formal crossing points, however there is immediate footpath connectivity on the opposite side via the footway adjacent to the Victoria Hall. As an alternative access could be gained through

the shared access into the Taylors Yard development. Both provide easy and safe access to the bus stops, facilities and services, and pre-school facilities.

- 2.11 However, it is recognised that without mitigation there is still likely to be some discouragement given the physical crossing of the road required. Therefore we would agree that a minor negative score is reasonable.
- 2.12 The development of the site does provide the opportunity of integrating with the existing footpath that extends through the western part of the site and connects with Wonston Road opposite Victory Hall. This is an existing well used crossing point with good visibility and a suitable separation from the junction with Winchester Hill to the west, where traffic is very light. This could be upgraded with the use of informal road markings, road narrowing and signage.
- 2.13 With such mitigation in place this should be scored as a negligible effect.

IIA Objective 4: To improve public health and wellbeing and reduce health inequalities in the District

IIA 4.1: Make provision for new, or replacement healthcare facilities to ensure there is capacity to meet the level of development planned for and access for all?

IIA 4.2: Promote health and wellbeing by providing access to and maintaining, enhancing, connecting and creating multifunctional open spaces, green/blue infrastructure, public rights of way, recreation and sports facilities?

IIA 4.3: Prevent, avoid and/or mitigate adverse health effects associated with potentially inappropriate neighbouring uses which could detrimentally impact residents (for example noise and light pollution)?

IIA 4.4: Avoid directing sensitive development (e.g. housing, schools, offices and health facilities) to areas of poor air quality (e.g. major roads and/or industrial areas)?

IIA 4.5: Make provision for personal private outdoor space within new developments

Brightlands Assessment

- 2.14 The proposed draft allocation at Brightlands makes reference to the provision of open space to the south of the site. In the absence of any detail regarding the extent of this, it is assumed to be of reasonable size and sufficient to cater for at least the needs of the development.
- 2.15 As with objective 2 above, the site is separated from the main recreational area at Gratton Recreational Ground and public rights of way by the A30. Although close-by this does continue to represent a physical barrier to connectivity by walking and cycling.

- 2.16 More significantly the IIRA acknowledges that, as a consequence of its location very close to the A34 and adjacent to the Sutton Scotney service area, 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.* (Appendix E, IIRA). To a lesser extent, the location could also have implications for light pollution and air quality, although it is accepted it is not within a designated Air Quality Management Area.
- 2.17 The proposed draft allocation acknowledges noise as a significant constraint and includes a criteria that *'requires a noise assessment to be completed and appropriate mitigation to prevent excessive disturbance to the planned residential development from the nearby service station and major road'*.
- 2.18 Para 4.291 of the IIRA specifically references that *'The potential negative effects identified by the IIA of residential site options could be avoided by selecting sites outside of air and noise pollution hotspots'*. Given this and all the above it is very surprising that the site has been scored minor positive against this objective pre-mitigation. It is considered that a significant negative scoring should be more appropriate.
- 2.19 It is clear that further noise assessment is necessary before a strategy for mitigation can be put forward and agreed. It is however likely that there will remain a degree of disturbance and/or potential for non-optimal solutions such as triple glazing or a compromised design and layout. Post mitigation a minor negligible effect is considered more appropriate.

Wonston Road Assessment

- 2.20 The Wonston Road proposal as set out within representations to the Regulation 18 Plan included a large area of open space to the west, incorporating the existing public right of way. This was far in excess of what would be required based on applying required standards to a development of this scale.
- 2.21 Again as with objective 2 above, the site has access to the existing Gratton Recreational Ground and although further distant than Brightlands, it is still within easy walking distance via safe and convenient paths and/or shared surfaces.
- 2.22 Importantly, it is not constrained by any noise pollution, nor any light and air pollution.
- 2.23 It also scores a minor positive against this objective, but this is much more understandable given the context above.
- 2.24 Beyond providing some modest enhanced connectivity to the Gratton Recreational Ground across Wonston Road, there is little mitigation needed and therefore similar score of minor positive is considered reasonable.

IIA Objective 7: To ensure essential services and facilities and jobs in the District are accessible

IIA 7.1: Provide for development that is well linked to existing services and facilities (e.g. shops, post offices, GPs, schools, broadband) and employment areas?

IIA 7.2: Provide for additional services and facilities and higher paid employment opportunities to support new and growing communities and address areas of deprivation?

Brightlands Assessment

- 2.25 As considered above against objective 2, the separation afforded by the A30 trunk road does act as a significant barrier to accessibility to key facilities and services within the village
- 2.26 In respect of additional facilities, given the scale of the site it is unlikely to deliver any infrastructure in its own right and this no reference to any provision within the proposed draft allocation, beyond open space provision. The development itself will bring investment into the local economy and local facilities and services.
- 2.27 The assessment scores the site as a minor negative pre-mitigation. For the same reason as considered in assessing objective 2, this does not adequately reflect the constraint afforded by the A30 to accessibility by non-car modes and it should be considered as a significant negative.
- 2.28 Again similarly, whilst the mitigation measures set out within the proposed draft allocation will improve connectivity to facilities and services, the need to physically cross the A30 or any trunk road is still considered would reduce accessibility to key facilities and services and a score of a minor negative is considered more appropriate than negligible as set out within the report.

Wonston Lane Assessment

- 2.29 The Wonston Lane site does have good accessibility to services and facilities just a short walk away. However, as with Objective 2 above, it is recognised that without mitigation there is likely to still be some discouragement to non-car accessibility given the physical crossing of the road required. Therefore we would agree that a minor negative score is reasonable.
- 2.30 Again, similar to Objective 2, there is an existing public right of way that can be integrated within any development of the site to provide a direct connection to an existing crossing point with good visibility adjacent to Victory Hall, where traffic is very light. This could be upgraded with the use of informal road markings, road narrowing and signage.
- 2.31 As such it is considered a negligible effect scoring post mitigation is appropriate.

IIA Objective 8: To support the sustainable growth of the District's economy

IIA 8.1: Allow for the delivery of land and infrastructure to meet the District's projected economic needs?

IIA 8.2: Support the prosperity and diversification of the District's rural economy?

IIA 8.3: Support stronger links to the wider economy, including aligning with the Enterprise M3 and Solent LEPs?

IIA 8.4: Support the vitality and viability of Winchester's Town, district and Local Centres?

IIA 8.5: Promote the achievement of a circular [See reference 19], low carbon economy?

IIA 8.6: Support the District's critical natural and green infrastructure assets as a means to promote the area as an attractive location for new business and to encourage growth in tourism?

Brightlands Assessment

- 2.32 The assessment scores the site as negligible /uncertain against this objective pre-mitigation. Given the nature of the objective and related questions this is reasonable. There would be some investment in the local economy and facilities and services, however the scale of this will be small. There would remain some influence as a consequence of the A30 separation but this is likely to be through greater use of non-car modes rather than not supporting the facilities and local economy itself.
- 2.33 For similar reasons, the scoring against the objective post mitigation of negligible is considered reasonable.

Wonston Lane Assessment

- 2.34 The assessment similarly scores the Wonston Lane site as negligible/uncertain pre-mitigation. There is no reason to disagree with this conclusion based on the objective and related questions and given the approach to the scoring of Brightlands and the similar proximity to facilities, services and employment.
- 2.35 However, it is considered a reasonable distinction can be made post mitigation given the opportunity to enhance and upgrade the existing public right of way network through realising an opportunity to re-route and/or upgrade the existing Watercross Way long distance footpath adjacent to the site. This would aid in the promotion of this asset and related benefits of additional tourism it could bring.
- 2.36 It is accepted this is not a significant however it is considered reasonable that post mitigation this could be scored as a minor positive effect.

IIA Objective 9: To support the District's biodiversity and geodiversity

IIA 9.1: Conserve and enhance designated and undesignated ecological assets within and outside the District, including the Solent and Southampton Water and New Forest designated sites, and seek to promote measurable biodiversity net gain?

IIA 9.2: Conserve and enhance green infrastructure and ecological networks, including not compromising future improvements in habitat connectivity?

IIA 9.3: Support appropriate interactions for members of public with nature and limit the potential for the adverse effects of increased recreational disturbance?

Brightlands Assessment

- 2.37 The site is located within the Impact Risk Zone of the River Test SSSI. Details with regard to the ecological assets within the site itself are unknown. However, there will be some loss of boundary vegetation to facilitate access, and some compromise of assets is likely as a consequent of introducing housing and population within the site.
- 2.38 Consequently, a pre-mitigation scoring of significant negative within the IIRA against this objective is considered reasonable.
- 2.39 Potential mitigation is unknown at this stage as is the opportunity to deliver bio-diversity net gain. The IIRA assessment post mitigation continues to conclude as a significant negative. Whilst this is understandable to an extent, some acknowledgement of mitigation would seem reasonable and therefore a score of significant negative and minor positive may be more appropriate.

Wonston Road Assessment

- 2.40 The Wonston Road site is also located within the Impact Risk Zone of the River Test SSSI, albeit marginally further distant. Similarly, ecological assets within the site itself are unknown, there will be some loss of boundary vegetation to facilitate access and the development of a greenfield site and introducing housing and population within the site will compromise ecological assets.
- 2.41 As above, a pre-mitigation scoring of significant negative within the IIRA against this objective is considered reasonable.
- 2.42 Equally, as potential mitigation is unknown at this stage as is the opportunity to deliver bio-diversity net gain, some acknowledgement of mitigation would seem reasonable and therefore a score of significant negative and minor positive may be more appropriate.

IIA Objective 10: To conserve and enhance the character and distinctiveness of the District's landscapes

IIA 10.1: Protect and enhance the District's sensitive and special landscapes?

IIA 10.2: Protect and enhance the setting, views, tranquillity and dark skies of the South Downs National Park?

IIA 10.3: Conserve and enhance the character and distinctiveness of the District's non-designated landscapes, settlements and communities?

IIA 10.4: Promote visually attractive development with high quality design, layout and appropriate and effective landscaping with a scale of development appropriate to the sensitivity of the landscape?

Brightlands Assessment

- 2.43 Brightlands is not located within any nationally significant landscape designation and is some distance from the South Downs National Park to the south-east and North Wessex National Landscape designation to the north.
- 2.44 Based on a site visit in August 2024 it is visually contained from public vantage points by boundary trees and hedgerows adjacent to the A30 and by an old railway embankment to the east. There is a public right of way adjacent to the western boundary although vegetation close to this boundary is overgrown and visibility of the site restricted. The site can be glimpsed from the north from the access to the Wessex Park mobile home park, although there is an intervening low hedge along the northern boundary of the site.
- 2.45 The objective assesses the landscape impact based on the high level assessment provided within the SHELAA 2023 assessment. This assessed the landscape constraint as GREEN on the basis that, in accordance with para 5.14 of the SHELAA, the site was not likely to be landscape sensitive. Consequently, the objective scores the site as negligible uncertain pre mitigation. On the basis of the above, this is considered reasonable.
- 2.46 Post mitigation the site is assessed as negligible. Again this is considered reasonable on the basis that additional planting could be provided if needed.

Wonston Road Assessment

- 2.47 Wonston Road is similarly not located within any nationally significant landscape designation and is some distance from the South Downs National Park to the south-east and North Wessex National Landscape designation to the north.
- 2.48 Based on a site visit in August 2024 the site is visible from the existing public footpath that crosses the eastern part of the site. This affords views of the site eastward and northward but this is in the context of vegetation, trees and houses within the existing settlement beyond.

- 2.49 Views from Wonston Road and from the east are possible but limited by vegetation along the boundary and existing properties to the east.
- 2.50 The objective assesses the landscape impact based on the high level assessment provided within the SHELAA 2023 assessment. This assessed the landscape constraint as RED. This is notwithstanding that para 5.14 of the SHELAA confirmed that *'it is not considered appropriate at this stage to rate a site red for the SHELAA assessments due to the limited level of information provided.'*
- 2.51 It is reasonable to conclude that the site is likely to have landscape impacts pre-mitigation, however these should have been based on a rating of AMBER and not RED. The objective scores the site as negligible uncertain pre mitigation. On the basis of the above, this is considered reasonable.
- 2.52 However, it is reasonable that suitable additional planting can be provided to assimilate any housing within the landscape successfully. This would suggest that post mitigation the site should be assessed as negligible.

IIA Objective 11: To conserve and enhance the District's historic environment including its setting

IIA 11.1: Conserve and enhance the District's designated heritage assets, including their setting and their contribution to wider local character and distinctiveness?

IIA 11.2: Conserve and enhance the District's non-designated heritage assets, including their setting and their contribution to wider local character and distinctiveness?

IIA 11.3: Ensure the management and enhancement of the District's heritage assets, including bringing assets back into appropriate use, with particular consideration for heritage at risk?

IIA 11.4: Promote access to, enjoyment and understanding of the historic environment for residents and visitors of the District?

IIA 11.5: Sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change

Brightlands Assessment

- 2.53 The site at Brightlands is located immediately to the north-west of the Sutton Scotney Conservation Area. It is relatively distant from Grade II Listed Buildings. The nearest is located to the west side of Oxford Road within the village centre and separated from the site by more modern residential development.
- 2.54 As with the landscape related objective above, the scoring of the heritage impacts is also based on the SHELAA assessment. It is acknowledged that this exercise was a high level assessment based on impacts on heritage assets.

- 2.55 The SHELAA assessment rated the site as GREEN against all heritage constraints. The IIRA scored the site as negligible/uncertain against this objective. Although the works to the access/roundabout and pedestrian crossing mitigation measures may impact on the Conservation Area setting, based on the nature of the works the above this scoring is considered reasonable.
- 2.56 Similarly post mitigation, where more detailed assessments of key views into the Conservation Area for example could be considered, a score of negligible is considered reasonable.

Wonston Lane Assessment

- 2.57 There are 3 Grade II Listed Buildings located to the north-east of the Wonston Road site. The Sutton Scotney Conservation Area also extends to the northern boundary of the site along Wonston Road.
- 2.58 Similar to the Brightlands site, the SHELAA scored the site as GREEN against all heritage constraints. However, the IIRA scored the site as minor negative/uncertain. It is unclear why this conclusion has been reached based on the previous SHELAA assessment, though it is acknowledged that Listed Buildings and Conservation Area extend close to the boundary of the site.
- 2.59 As part of mitigating any impacts, there is an opportunity to located public open space on the eastern part of the site and, along with suitable planting, provide a suitable buffer to the Listed Buildings and Conservation Area in this area to safeguard their setting. There will be some impact on the Conservation Area to provide the access on to Wonston Road to the north, however retaining all the remaining boundary vegetation will assist.
- 2.60 On the basis of the above, post mitigation negligible effects against this objective are considered more reasonable.

IIA Objective 12: To support the efficient use of the District's resources, including land and minerals

IIA 12.1: Promote the re-use of previously development land?

IIA 12.2: Avoid development on the District's higher quality agricultural land?

IIA 12.3: Promote the achievement of the waste hierarchy?

IIA 12.4: Ensure that sterilisation of mineral resources is prevented unless development can be justified at locations where this would result?

Brightlands

- 2.61 Brightlands is a greenfield site on Agricultural Land Classification Grade3. The IIRA assessment advises that greater than 25% of the site is within a Minerals Safeguarding Zone. The Hampshire Minerals and Waste Plan policy map suggests the boundary extends to the eastern edge of the site.

- 2.62 The IIRA scores the site against this objective as a significant negative on this basis, primarily a consequence of its greenfield nature. As no mitigation is possible, it also scores a significant negative post mitigation.

Wonston Road

- 2.63 Similarly, Wonston Road is a greenfield site on Agricultural Land Classification Grade3. The site is definitely outside the Minerals Safeguarding Zone.
- 2.64 The subsequent scoring against this objective of a significant negative is consistent with the approach to the Brightlands scoring, and equally it would be reasonable to apply a significant negative post mitigation for similar reasons.

13.2: Minimise inappropriate development in Source Protection Zones?

IIA 13.3: Preserve water flows of the District's rivers, including the River Itchen?

IIA13.4: Support development and design which would minimise the use of water in new development, including water use in line with Southern Water's Target 100 demand reduction programme as well as the recycling of greywater

Brightlands

- 2.65 The IIRA scores the Brightlands site as a minor negative on the basis that it is either in a Source Protection Zone 2 or 3, falls within a drinking water safeguard zone (groundwater), or falls within a drinking water safeguard zone (surface water). The on-line mapping available is limited so it is difficult to confirm this. However, the proposed draft allocation policy acknowledges that high groundwater levels are present.
- 2.66 Although housing could be designed to minimise water usage, the scoring post mitigation remains as minor negative.

Wonston Road

- 2.67 In the absence of detailed mapping, given the close proximity of the site to Brightlands it is assumed the site is also either in either in a Source Protection Zone 2 or 3, falls within a drinking water safeguard zone (groundwater), or falls within a drinking water safeguard zone (surface water). On this basis a minor negative would be reasonable and consistent.
- 2.68 Similarly, to be consistent a score of minor negative post mitigation is also reasonable.

IIA Objective 14: To manage and reduce flood risk from all sources

IIA 14.1: Limit the amount of development in areas of high flood risk and areas which may increase flood risk elsewhere, taking into account the impacts of climate change?

IIA 14.2: Promote the use of SuDS and other flood resilient design

Brightlands

- 2.69 The south-east corner of the site is within Flood Zone 2 and 3. Flood Zone 2 and 3 also extend across part of the A30 to the south. The proposed draft allocation policy acknowledges the proximity to flooding (though implies this is adjacent rather than within the site) and makes reference to the proposed access being taken from the existing A30 roundabout, which is within Flood Zone 3.
- 2.70 Despite this the IIRA scores the site as a negligible impact on the basis that less than 25% of the site area is within Flood Zone 2 or 3, and it is assumed, development could be located outside of Flood Zone 2 and 3. This is reasonable if implied consistently.
- 2.71 Although SuDS and other design considerations could be implemented as part of the mitigation associated within any development, the IIRA continues to score the site as negligible post mitigation. Again, this is reasonable if applied consistently.

Wonston Road

- 2.72 A narrow strip of Flood Zone 2 and 3 extends north-south across the Wonston Road site. However, as this is less than 25% of the site area for consistency this should also score a negligible impact.
- 2.73 In addition to incorporation of SuDS and other design mitigation, any development can ensure the Flood Zone 2 and 3 areas are located within a proposed space, as implied within the representations submitted to the Regulation 18 Plan.
- 2.74 For consistency, a negligible impact post mitigation is also assumed.

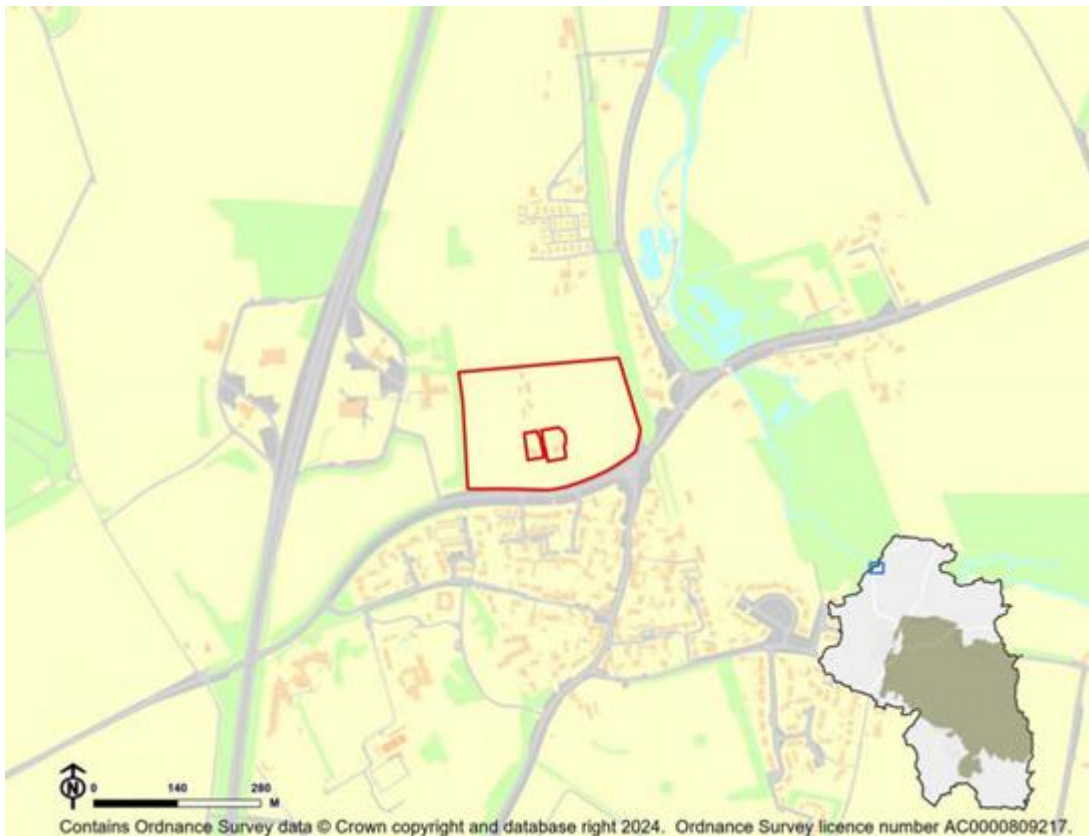
3. Summary

- 3.1 Taking into all the above into account, a revised IIRA comparative scoring schedule is provided at Appendix 1, assessing both sites pre and post mitigation.
- 3.2 The IIRA assessment of the Brightlands site pre and post mitigation has some serious shortcomings. These apply in particular to the failure to recognise the full extent of the visual and physical severing impact of the A30 on connectivity and integration with the existing settlement and facilities and services.
- 3.3 Reducing carbon footprint and encouraging accessibility and travel by non-car modes are significant objectives embedded throughout the Regulation 19 Plan. The IIRA scoring against objective IIRA 2 and 7 should be reviewed and downgraded accordingly. Although not assessed against individual sites, this could equally apply to Objective 5 given references to integration, community cohesion and pedestrian interaction.
- 3.4 In addition, the IIRA scoring in respect of objective IIRA 4 does not adequately reflect the existing noise constraint of the nearby A34 and related service area. This is significant in minimising impact on well-being, another key strand of the Regulation 19 Plan.
- 3.5 Had the IIRA also assessed the Wonston lane site post mitigation, as would be expected when assessing reasonable alternatives in accordance with Strategic Environmental Regulations, some of the impacts are very likely to have been suitably addressed through mitigation, and have reflected opportunities for off-site benefits, e.g. enhancement to the Watercress Way and other PRow.

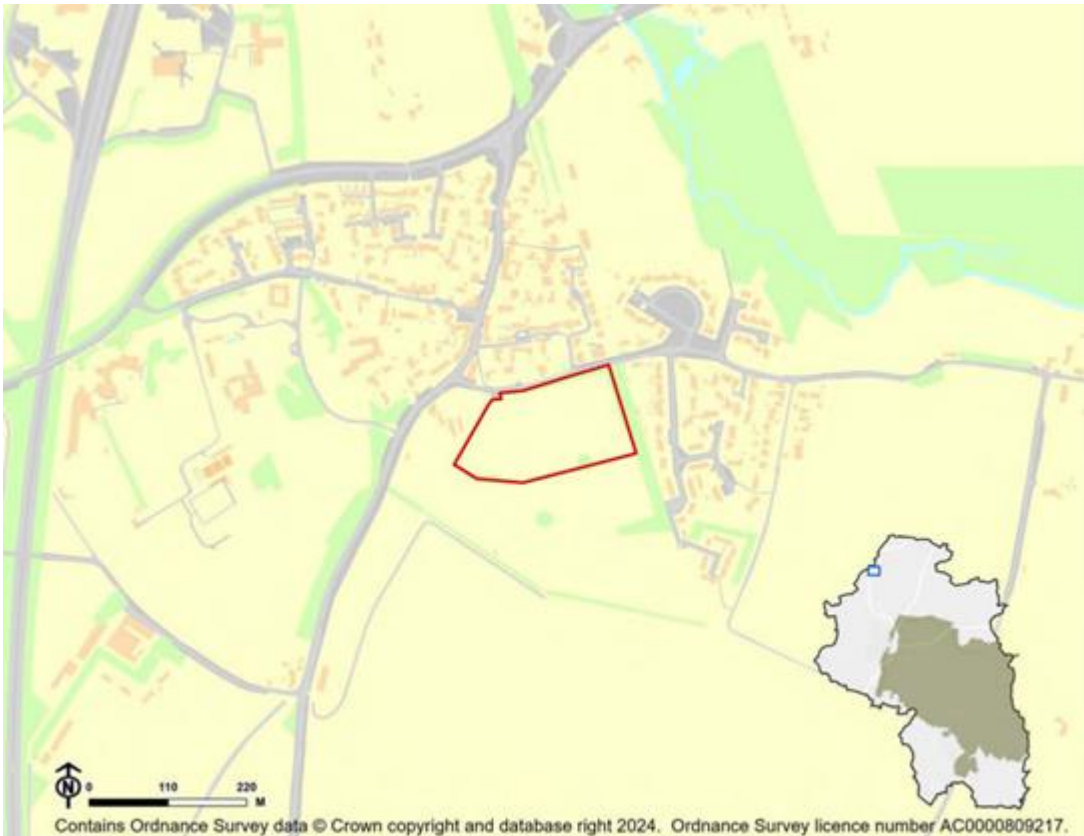
Appendix 1 – Comparative Assessment Summary Table

Site Ref.	Parish	Address	Proposed Use	IIA1	IIA2	IIA4	IIA7	IIA8	IIA9	IIA10	IIA11	IIA12	IIA13	IIA14
WO10	Wonston	Land at Brightlands (North of A30), Sutton Scotney	Residential use-pre mitigation	-	--	--	--	0?	--	0?	0?	--	-	0
WO10	Wonston	Land at Brightlands (North of A30), Sutton Scotney	Residential use – post mitigation	0	-	-	-	0	-/+	0	0	--	-	0
WO11	Wonston	Land South of Wonston Road	Residential use- pre-mitigation	-	-	+	-	0?	--	-?	-?	--	-	0
WO11	Wonston	Land South of Wonston Road	Residential use - post mitigation	-	0	+	0	+	-/+	0	0	--	-	0

Appendix 2 – Site W010: Land at Brightlands (North of A30), Sutton Scotney – IIRA Plan Extract



Appendix 3 – Site WO11: Land South of Wonston Road, Sutton Scotney – IIRA Plan Extract



Turley
Mountbatten House
Grovesnor Square
Southampton
SO15 2RP

Appendix 4 – Summary of Engagement (Turley)

Summary of Engagement

Land south of Wonston Road

Consultation overview

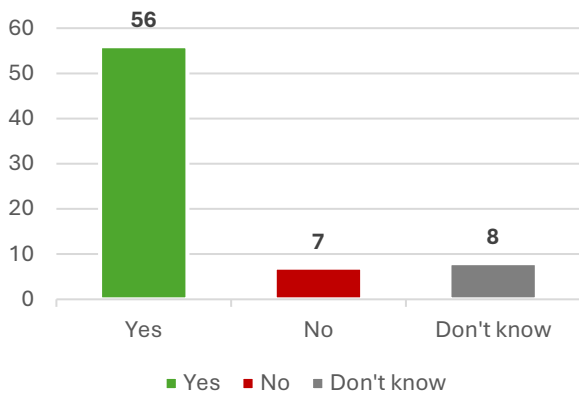
1. Alongside Winchester City Council's Regulation 19 Local Plan consultation, Pennybar has conducted its own local consultation regarding the potential to bring forward its site on land south of Wonston Road, Sutton Scotney as a housing development site. This consultation gathered feedback on the general principle of developing the site for new homes, as well as the community's preferences for what they would like to see included in any development at Wonston Road.
2. The feedback received showed a clear preference for the Wonston Road site to be prioritised for housing allocation in the Local Plan, ahead of other potential sites within Sutton Scotney. Below sets out how this feedback was collected, along with a summary of the key themes and responses from the local community.
3. To engage with the local community, Pennybar participated in the Wonston Parish Council-led event on 4 September. At this event, representatives spoke with attendees, providing information about the Wonston Road site and potential development plans. Feedback forms were distributed to capture community input, and the results are detailed below.
4. Following this event, Pennybar distributed 610 leaflets to the residents of Sutton Scotney. The leaflets encouraged recipients to visit the dedicated project website, www.wonstonroadconsultation.co.uk, and submit their responses to Winchester City Council's consultation regarding potential development sites in Sutton Scotney.
5. Pennybar also attended Winchester City Council's consultation event on 25 September to address questions about the Wonston Road site and gather additional community feedback.
6. As a result of these engagement efforts, a total of 74 pieces of feedback were collected (72 feedback forms and two emails), as summarised below.

Consultation feedback

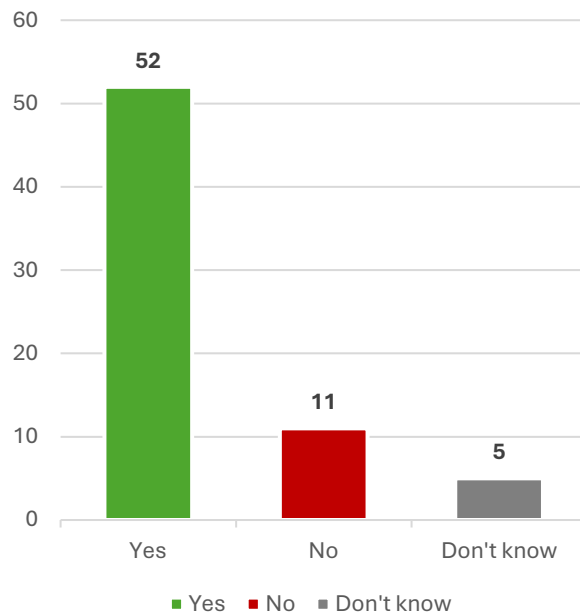
7. The feedback forms include questions addressing the suitability of potential development sites in Sutton Scotney, key development priorities for the area, and opportunities for potential community benefits. The feedback gathered will help shape any future proposals by Pennybar for development on land south of Wonston Road.
8. A majority of respondents to the consultation expressed concerns regarding the allocation of the Brightlands site and indicated their support for allocating the land south of Wonston Road as a preferred alternative.
9. Key findings from the consultation are summarised below:

- 79% of respondents said they support the allocation of the site south of Wonston Road as an alternative to the site that is currently allocated in the draft Local Plan, north of the A30;
 - 77% of respondents said they believe that development north of the A30 would risk potential highways safety concerns;
 - 76% of respondents said Brightlands would not integrate with the village of Sutton Scotney; and
 - 81% of respondents said they would not use facilities provided on the Brightlands site.
10. The feedback form asked respondents to identify which community benefits they would like prioritised in any future development on the site south of Wonston Road. The top two choices related to flooding, with 63 respondents selecting 'drainage solutions' and 60 choosing 'flood alleviation.' The third most popular option was 'spaces for nature,' chosen by 42 respondents. Additionally, 33 respondents supported opening the Watercress Way route, while 30 selected extending the Victoria Hall car park to accommodate school bus turning.
 11. Further questions focused on the type and size of housing that respondents would like to see prioritised. The feedback showed a community preference for semi-detached housing (48 respondents) and detached housing (36 respondents), with an emphasis on smaller homes, specifically 2-3 bedroom houses (42 respondents).
 12. When asked who new housing should be marketed towards, the majority favoured housing for young families (42 respondents) and new affordable housing (41 respondents).
 13. Regarding the scheme's design principles, most preferred were low-density housing (51 respondents), dedicating spaces for nature (38 respondents), and lower building heights (31 respondents).
 14. Additional feedback provided through the comments box raised concerns about current flood risk and drainage issues in the village, the potential impact of new development on local infrastructure and the highway network, and the effect of other recent residential developments in Sutton Scotney.
 15. Respondents were also asked whether they supported the allocation of the site south of Wonston Road for residential development, whether development north of the A30 could present highway safety risks, and whether the Brightlands site, allocated in Winchester City Council's draft Local Plan, would integrate with Sutton Scotney or if residents would use community facilities provided there.
 16. The full questions posed and the responses to these questions have been summarised in the below charts.

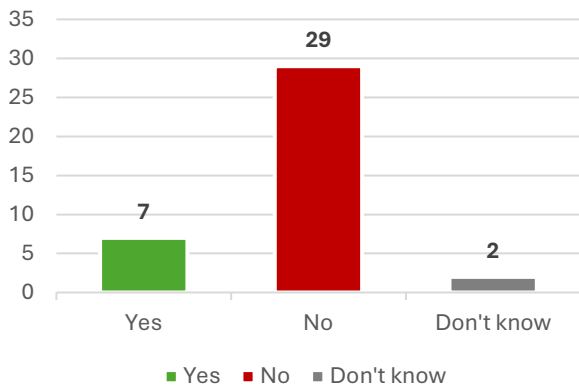
Subject to a drainage solution, do you support the allocation of our site south of Wonston Road for residential development as an alternative to the site that is currently allocated in the draft Local Plan, north of the A30?



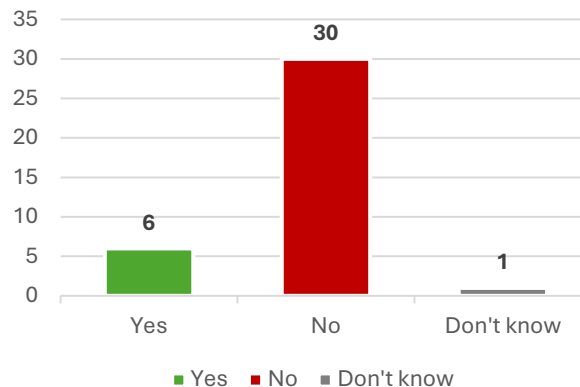
Do you think development north of the A30 risks potential highways safety concerns?



Do you think Brightlands will integrate with the village?



Would you use Brightlands' facilities?



17. As previously mentioned, Pennybar is committed to using all feedback received to guide any development proposals for its site south of Wonston Road and will continue to actively engage with the local community throughout the process.
18. Furthermore, Pennybar has pledged to address surface water flooding in Sutton Scotney by implementing flood alleviation measures. The company is also committed to delivering key community priorities, including creating spaces for nature, extending the Victoria Hall car park, and opening up the Watercress Way as part of any future development.

Contact
Marley Bennett
Marley.bennett@turley.co.uk

Appendix 5 –Flood Risk Assessment (Ark Environmental)

Ark Environmental Consultancy Limited
c/o Bradshaws Charter Court,
Well House Barns, CH4 0DH

May 2023

To whom it may concern,

Land south of Wonston Road, Sutton Scotney: Housing Allocation Site Support Note: Flood Risk, Surface Water & Foul Drainage

Introduction

We are the appointed flood risk and drainage consultants as part of the Land south of Wonston Road, Sutton Scotney project team.

We have undertaken paid for Pre-Application advice approaches / meetings with the EA and the LLFA to assist in setting the design parameters.

We also promote to all our clients that early engagement is preferred particularly when there will be direct design input and also where other future permit and consents might be required, so these requirements can also be used as a design tool.

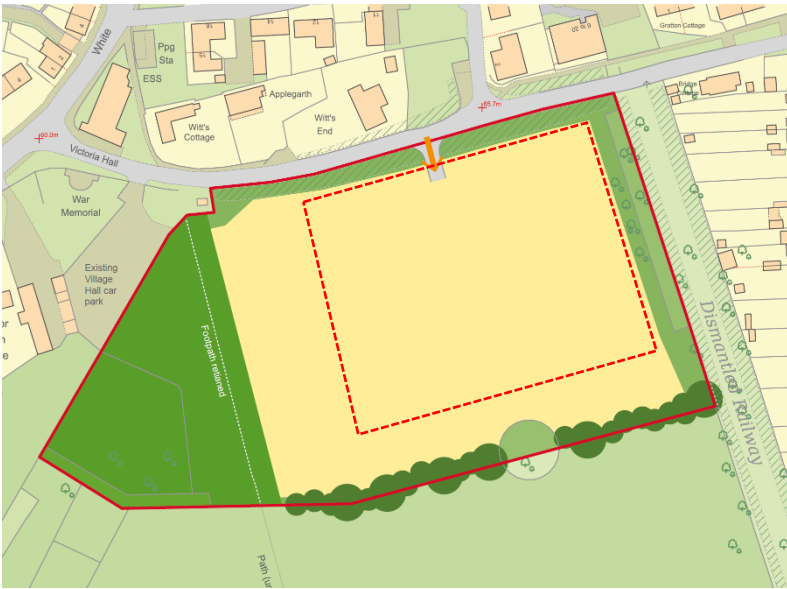
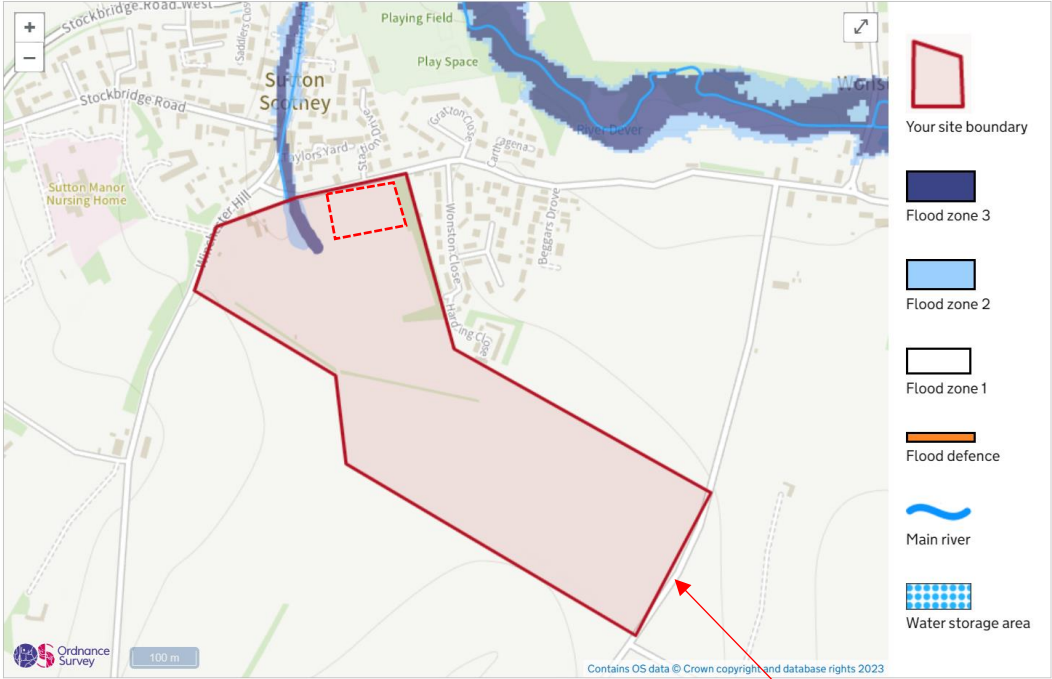
This note has been prepared to support a potential allocation of the site through the emerging Local Plan and provides a summary of the policy context in terms of the flood designs, mitigation and consenting compliance of a housing scheme at this site.

The site is wholly in Flood Zone 1, it is fully NPPF and PPG compliant in flood risk and drainage terms and there is a valid proven connection for the surface water and foul generated by a housing scheme.

The story so far:

- A high level flood risk appraisal has been completed
- A concept drainage strategy has been completed
- These have been used to consult the EA and the LLFA
- We have received responses from the EA and the LLFA and a residential scheme can be secured on this site without objections from the EA / LLFA on flooding and drainage grounds
- The proposed development is to be residential
- The NPPF & PPG (2022 updated) requirements have been applied and addressed
- PPG sequential approach can be achieved:
 - a. First requirement of policy is “avoid” / use area of lowest or no flood risk
 - i. This can be achieved at this site
 - ii. 98% of the site is in FZ1
 - iii. 100% of residential can be in FZ1

Summary of Flood Setting: All Sources



- 1. Solid redline:**
Total available area
- 2. Dashed redline:**
Residential footprint area
- 100% FZ1 outside of the floodplain and low risk from all sources potential residential plot
- 3. Remaining yellow area:**
Access / amenity / biodiversity

Refer to Appendix A for the full fluvial and surface water EA mapping:

Flood Sources	Site Status	Comment on flood risk posed to / from the development
Fluvial / Tidal	<p>Site is 98% in FZ1</p> <p>Not in new climate change allowances extents</p> <p>No breach flooding as no raised defences</p> <p>Access and egress in unrestricted FZ1 and through unrestricted FZ1</p> <p>Winterbourne (ordinary watercourse) is located outside of the residential site boundary; this is culverted under Sutton Scotney</p> <p>A full condition survey has been provided by the EA</p>	<p>EA confirmed no objection in principle given it is fully policy compliant</p> <p>No highly vulnerable uses</p> <p>This is where NPPF wants development to be prioritised in flood risk terms</p>
Groundwater	<p>The application site boundary is outside the historic flood events and outside the winterbourne extents</p> <p>The general area is known to have groundwater flooding / incidents: the winterbourne itself has elevated groundwater as a source</p>	<p>The proposed development will not increase the risk of groundwater flooding.</p> <p>Low Risk</p>
Artificial Sources	<p>Site is now within a general EA Reservoir Flood Warning area</p> <p>No other artificial sources with likely flood flowpaths that could reach the site</p>	<p>Low Risk</p> <p>Not relevant to the scheme as residential use at the site is not in question</p>
Surface Water / Sewer Flooding	<p>Site is not located in a Critical Drainage Area and is not within surface water flood extents from the council and the EA</p> <p>Condition, depth and location of surrounding infrastructure uncertain</p>	<p>Minimal increase in impermeable areas</p> <p>No additional drainage assessment required</p> <p>Results in better protected and flood future-proofed property than existing.</p> <p>Low Risk</p>
Climate Change: new allowances	<p>Site is not within the climate change flood extents (fluvial or tidal)</p> <p>Scheme addresses climate change in the drainage strategy</p>	<p>Scheme will not increase the peak flow and volume of discharge from the site</p> <p>Scheme will restrict for climate change allowances</p> <p>Reduced rate and volume particularly in the low order storms: improving capacity of the culvert</p> <p>Low risk posed to and from the development</p>
Historic Flooding	<p>Included in the EA / council data where appropriate</p>	<p>Site is not in an area of historic flooding based on available data</p>

EA Pre-App 2023: Sustainable Places

See email responses in Appendix B

The EA have confirmed in writing that if the application boundary is outside of the flood extents, they would not object to the scheme.

All footprint and access / egress will be within FZ1 / in NO hazard for surface water and all other sources that could affect the future intended operation at the site

Furthermore in support of the site being an allocation for residential:

- No Sequential Test is required as the residential site boundary will be outside of the fluvial and surface water flood extents and all other sources of flooding (as per PPG 2022 August update) can be addressed as they are either low or a residual hazard posed to and from the site and scheme
- No Exception Test will be required given the site will be outside the fluvial and surface water flood extents (NPPF compliant) and all other sources of flooding (as per PPG 2022 August update) can be addressed as they are either low or a residual hazard posed to and from the site and scheme

EA Permitting c/o Scotney Culvert Responsible EA officers 2023

See Email responses in Appendix B

- We received further response from the EA Flood and Coastal Risk Management Office - Hampshire and Isle of Wight
- The EA provided their full CCTV survey of the culvert
- It was confirmed in email that:
 - a. connection to the culvert would require a Flood Risk Activity Permit (FRAP): a standard requirement
 - b. the consent would be reviewed through their office rather than the National Permitting Team

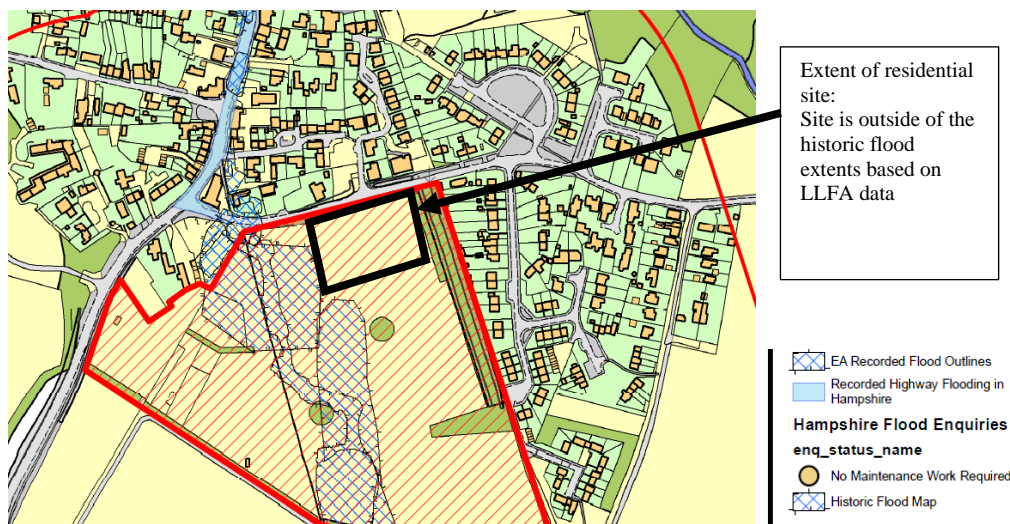
LLFA Pre-App 2023

See full formal written response and mapping from LLFA in Appendix B

- We sent a Technical Note and discussed at a meeting with the LLFA on the 13th March 2023
- The challenges in Sutton Scotney in terms of downstream flood risk have been explored including the presence of the “winterbourne” (ephemeral groundwater and saturation excess source of watercourse) southwest of the site (indicated by the surface water hazard flooding) which connects to the outfall to the Sutton Scotney culvert
- Any current runoff from the site as existing would be following the least resistance pathway and hence following the winterbourne pathway and thence to the culvert
- LLFA confirmed
 - a. Locate the development outside of the flood extents and historic flood extents
 - i. This has been achieved by the scheme

- b. that restricting to greenfield from the site would be compliant as this would be a betterment considering the scheme would be restricting including an accommodation for climate change; this storage on site including for climate change would not occur without the scheme hence a future proofed reduction in flood risk downstream (in drainage terms)
- c. “any drainage proposals should consider a discharge to the watercourse as high groundwater would prevent soakaways from functioning properly”
 - i. This has been explored and the EA would not have objection to this approach at this site because it would be consent and policy compliant (subject to full FRAP which would be post planning)

Extract from LLFA Historic Flooding



Foul Connections and Southern Water Scheme Update

It is understood that there are foul sewer capacity issues in Sutton Scotney and also constraints of there being no infrastructure adjacent or close to the site.

Southern Water are investigating a new pipe connection to improve the foul capacity for Sutton Scotney.

Southern Water New Scheme for Sutton Scotney Update

In summary

- The scheme is fully funded and involves new pumping stations to accommodate Gratton Close and Saddlers Close which will communicate effluent to the Harestock catchment area via a pipe that passes under our site (exact designs to be confirmed)

- The system and size of pumps are being specified to have appropriate capacity for the existing population and catchment area and allow for future development / growth with a 'design horizon' to 2035.
- Archaeological investigations are under way to de-risk the route through our site
- Final drawings are expected in late May / early June alongside an EIA decision.
- Actual works are proposed to start July or August with practical completion December 2024.
- The project has full funding.

Therefore the site itself is enabling this vital infrastructure for Sutton Scotney. The site itself will enable the removal of many cess / septic systems and will future proof the system.

This does not prejudice the potential area of residential development as indicated in this report.

However, importantly, the scheme does not need to rely on Southern Water or the proposed increased capacity scheme for Sutton Scotney.

The scheme being residential without a current in place option to discharge to sewer or to ground, following standard consenting requirements, will have the opportunity to install a standard off the shelf package treatment work (eg: Klargestar), which can discharge treated water to the culvert (watercourse).

Under the EA guidance the maximum permissible discharge is 5000.00m³ per day. The proposals will see c. 50.0m³ per day being discharged. The discharge for the scheme will be well below the maximum requirement.

Any system proposed will meet with the EA's strict requirements on water quality, providing the required level of treatment so as to not affect any offsite receptors.

Given the environmental setting and consenting requirements, a permit will still be required which is standard and considered obtainable given the scope of the scheme.

Summary of Scheme Design Responses: compliant site for residential

- The drainage strategy will restrict all surface water rates to greenfield rate
 - Flood resilient measures for all ground floors
 - Incorporate highest form of SUDS suitable
 - a. Above ground Source Control measures optimised given the water table / groundwater challenge
 - b. Green roof potential
 - c. Optimise permeable paving areas
 - d. New car parking areas: design with rain gardens / integrated aco and filtration areas
1. The piped connection for the restricted to greenfield rate discharge of surface water from the site would be to the outfall to the culvert / ordinary watercourse
 - a. The pipe connection and associated works would be within FZ3 / within the winterborne / within the surface water hazards
 - b. However, this is policy compliant and would be covered by the appropriate consent / licence with the LLFA for the ordinary watercourse elements and the appropriate permit with the EA (FRAP)
 2. Preferred option of connecting to the new fully funded Southern Water pumped system with also the option of the use of package treatment work with restricted connection to the outfall to the culvert as previously explored will be within the EA's consenting requirements

Conclusion

The area of proposed residential habitable footprint will be located outside of the historic flood extents and all other flood mapping extents, and wholly in Flood Zone 1. This is NPPF / PPG appropriate and all other elements of the scheme can be NPPF / PPG sequentially appropriate.

The site also enables the Southern Water capacity improvement scheme as detailed above.

The surface water strategy will be to restrict the rate and volume discharge to the watercourse (winterbourne / culvert).

The foul water strategy is within the EA's requirements and therefore consentable.

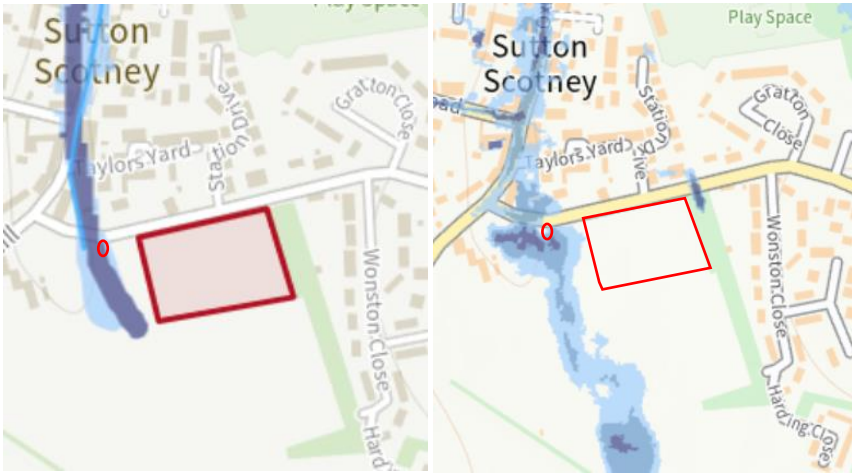
The foul water strategy also has a fully funded scheme that it can connect to as the preferred option, subject to Southern Water completing the works; the works have commenced and so there is no reason to indicate this option would not be available; we are just not relying on the scheme as a standard approach to manage the risks.

The above approach has been approved in principle with the EA and the LLFA.
Based on the existing data and opportunity provided by the site and scheme:

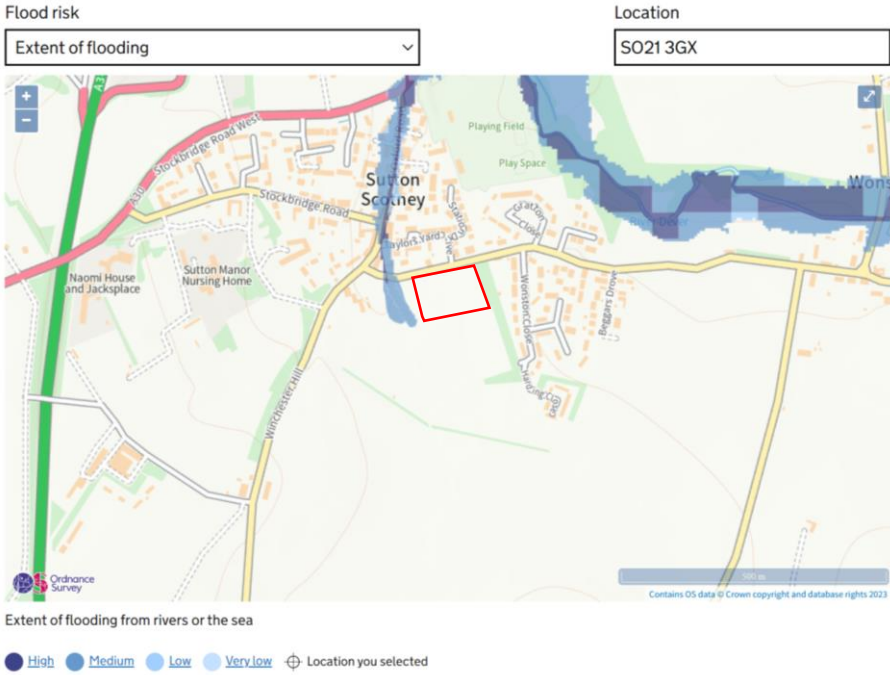
It is considered that the proposed development can be constructed and operated safely in flood risk terms, without increasing flood risk elsewhere, in fact reducing flood risk overall; it is therefore considered appropriate development at this site in accordance with the NPPF/PPG.

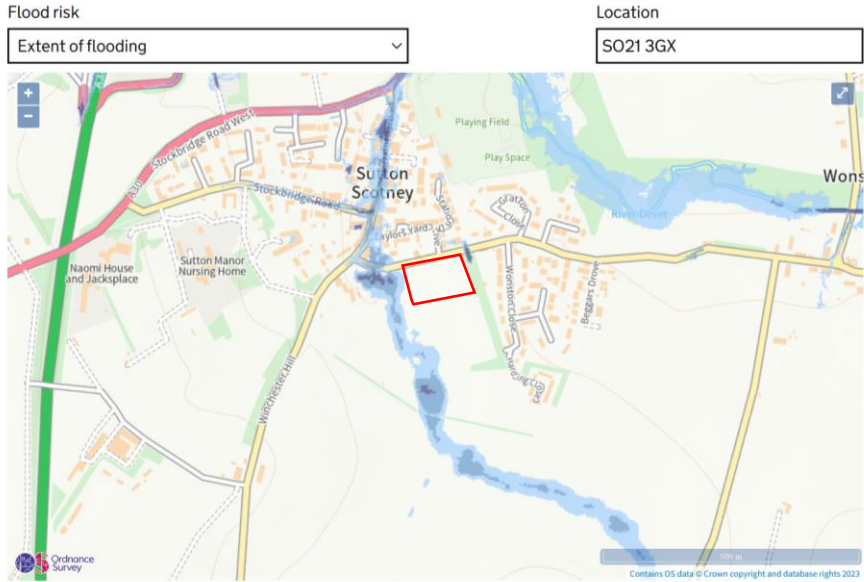
Therefore, there are no flood risk planning, flood risk consent or infrastructure constraints that would prevent the potential allocation of the site for residential development, provided the area identified for residential is wholly outside the flood risk areas identified.

Appendix A



Indicative habitable footprint boundary wholly in FZ1 / no – low hazard and circle denoting outfall to culvert as connection point



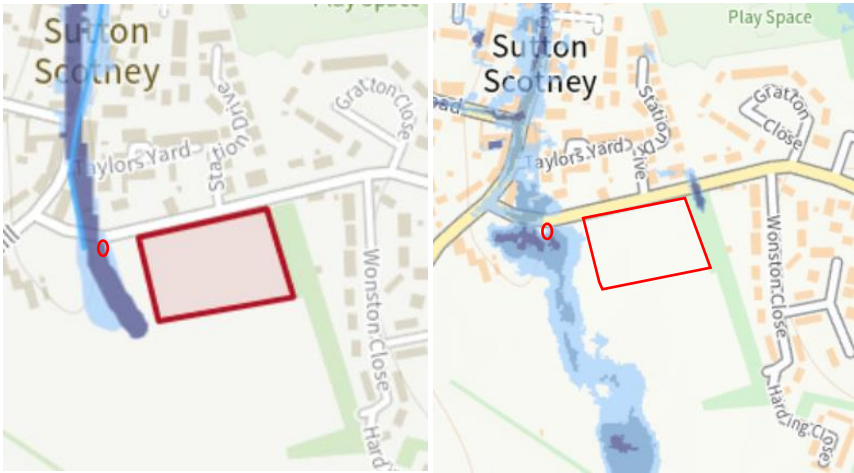


Extent of flooding from surface water

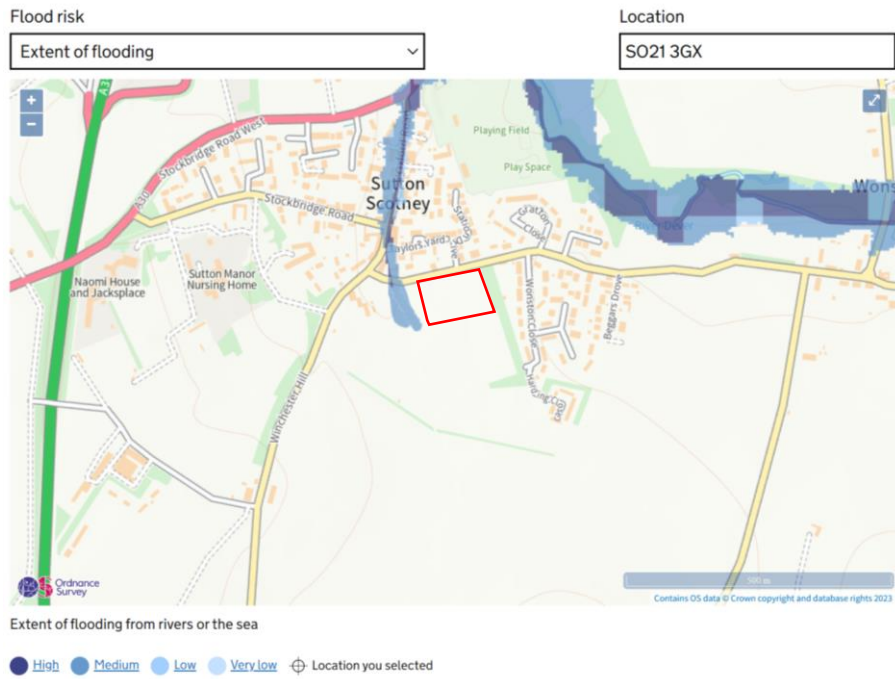
● High
 ● Medium
 ● Low
 Very low
 📍 Location you selected

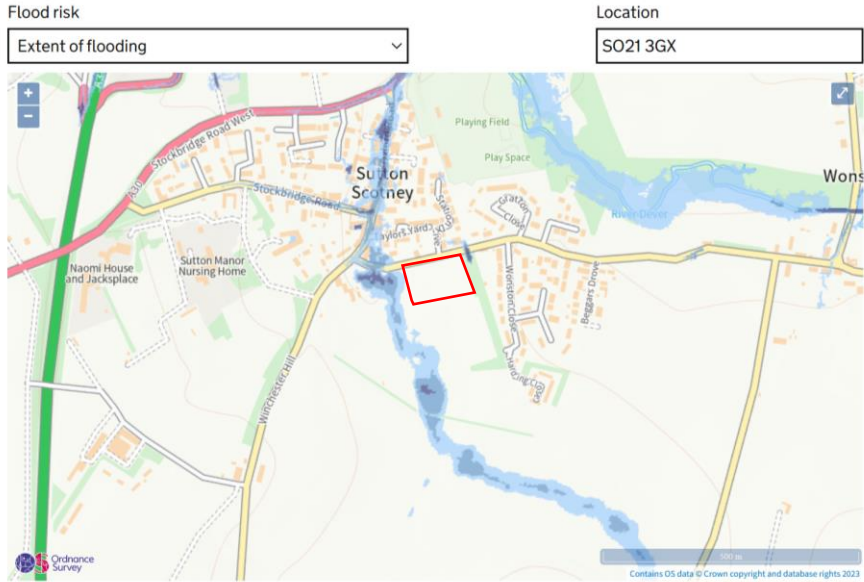


Appendix B



Indicative redline boundary wholly in FZ1 / no – low hazard and circle denoting outfall to culvert as connection point





Extent of flooding from surface water

● High
 ● Medium
 ● Low
 Very low
 📍 Location you selected



Appendix B



Hampshire
County Council

Universal Services
The Castle
Winchester, Hampshire SO23 8UD

www.hants.gov.uk

Enquiries to

[REDACTED]

My reference SWM-PRE/2023/0130

Direct Line

03707 798982

Your reference

Date

3 April 2023

Email

swm.consultee@hants.gov.uk

Dear Sir/Madam,

Proposed development/FRA at Land south of Wonston Road Wonston Road , Sutton Scotney, WINCHESTER, HAMPSHIRE SO21 3GX(Application No.

Hampshire County Council as Lead Local Flood Authority has provided comments in relation to the above pre-application in our role as statutory consultee on surface water drainage for major developments.

In order to assist applicants in providing the correct information to their Local Planning Authority for planning permission, Hampshire County Council has set out the information it requires to provide a substantive response at <https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/planning>

Assessment of Flooding

The site is mostly within Flood Zone 1, generally meaning a low risk of flooding from rivers, however there are areas of Flood Zones 2 and 3 relating to the main river which formally begins in the adjacent car park area. The ephemeral watercourse upstream of this point is classified as ordinary watercourse, the route of which is highlighted in the flood map for surface water. The site is generally at very low risk of flooding from surface water, however there is a significant flow path of low to high risk through the site which becomes apparent when groundwater levels are high. The attached historic flood information report shows that groundwater flooding occurs in this area, relating to the ephemeral watercourse through the proposed development site. Development should be sited outside of areas at an

Director of Universal Services
Patrick Blogg

elevated risk of flooding in accordance with the National Planning Policy Framework.

The flood risk at this site is predominantly from groundwater, and as such natural flood management techniques may be of negligible benefit to the wider area. Storing water above the village may be considered an increase in flood risk. Any proposals to undertake engineering works in the existing flow path may require both planning and ordinary watercourse consent. Reports into previous flooding have recommended that the most beneficial works to reduce flood risk would be improvements to the main river system downstream, however the potential for improvement is limited.

Surface Water Management

The site is greenfield, and any drainage proposals should consider a discharge to the watercourse as high groundwater would prevent soakaways from functioning properly. The proposed drainage systems should be designed for the 1 in 100 year storm event plus a peak rainfall allowance, and half drain times should be assessed. No flooding should be experienced for the 1 in 30 year event plus a peak rainfall allowance. Network calculations should be provided alongside attenuation storage calculations to demonstrate this.

An assessment of existing runoff rates should be made for the greenfield site, and any proposed discharges off site should be restricted to not exceed the rates for storms up to the 1 in 100 year event plus a climate change allowance for peak rainfall. The LLFA would accept discharges from all storms up to the 1 in 100 year event to be restricted to Q_{bar} .

Flood exceedance flow routes and allowable flooded extents should be provided for all drainage strategies, along with maintenance information.

SuDS Design and Selection of Drainage Features

SuDS should be provided to include an element of biodiversity and amenity as well as managing water quality and quantity. Quantity should be assessed through hydraulic calculations for the relevant modelled storm events. Network calculations should be provided as appropriate to determine whether flooding occurs at manholes in piped parts of the system. Water treatment should be assessed through the simple index approach.

Surface Water Checklist

Please refer to the Surface Water Checklist for the information required by the LLFA for different types of planning application:

<https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/planning>

Yours faithfully,

A large black rectangular redaction box covering the signature of the sender.

Senior FWM Project Officer



Economy, Transport and Environment Department
Elizabeth II Court West, The Castle
Winchester, Hampshire SO23 8UD

Tel: 0300 555 1375 (General Enquiries)
0300 555 1388 (Roads and Transport)
0300 555 1389 (Planning)
Textphone 0300 555 1390
Fax 01962 847055
www.hants.gov.uk

Mr F Schiff



Enquiries to

Flood & Water Management

My reference

HFI-2023-0007

Direct line



Your reference

Date

03/04/2023

E-mail

fwm@hants.gov.uk

Dear Mr Schiff,

Re: Historic flood information for Land South of Wonston Road, Sutton Scotney

We refer to your request for historic flood information on 27/02/2023.

Thank you for your application for historic flood information for this site. Please find below the information we have on our systems that we believe to be relevant for this request. Kindly note the declaration on the final page with regards to this information.

Historic flooding information

We have reviewed our records of flood incidents for this area and have 22 records of flooding within a 250m radius of the site. This does not necessarily mean that other flood events have not occurred, they either may not have been reported or events may have occurred prior to 2012 – Hampshire County Council as Lead Local Flood Authority have only been maintaining flood records since then following the establishment of the Flood and Water Management Act 2010. The Environment Agency (EA) may hold data on flood events prior to this date.

Reference	Source	Date	Flood Source	Details
2116-219	EA	Winter 2000/01	Ephemeral watercourse	Groundwater/high water table
2116-220	EA	Winter 2000/01	Ephemeral watercourse	Groundwater/high water table
2116-222	EA	Winter 2000/01	Ephemeral watercourse	Groundwater/high water table

740-361	EA	Unknown	Unknown	Unknown
740-362	EA	Unknown	Unknown	Unknown
740-363	EA	Unknown	Unknown	Unknown
740-976	EA	Unknown	Unknown	Unknown
740-16874	EA	Unknown	Unknown	Unknown
740-17229	EA	Unknown	Unknown	Unknown
376-16909	EA	Unknown	Unknown	Unknown
2111-6447	EA	Winter 1995	Ephemeral watercourse	Groundwater/high water table
2111-10068	EA	Winter 1995	Ephemeral watercourse	Groundwater/high water table
2116-18656	EA	Winter 2000/01	Ephemeral watercourse	Groundwater/high water table
2116-22243	EA	Winter 2000/01	Ephemeral watercourse	Groundwater/high water table
4156-0	EA	28/2/14	Other	Groundwater/high water table
4155-31841	EA	Winter 2013/14	Main river	Groundwater/high water table
4155-31842	EA	Winter 2013/14	Main river	Groundwater/high water table
843-5104	HCC Highways	2014	-	Flooding to be investigated
1853	EA	Unknown	Unknown	Unknown
1856	EA	Unknown	Unknown	Unknown
1857	EA	Unknown	Unknown	Unknown
1861	EA	Unknown	Unknown	Unknown

Please refer to attached map for the location of this flood event(s). Kindly note that outlines of areas highlighted as highway flooding on the map may include properties or other off-highway areas that were not impacted by flooding.

There have been no flood reports undertaken for this area under Section 19 of the Flood and Water Management Act where significant flooding was reported.

Flood risk from surface water

The EA's Updated Flood Map for Surface Water illustrates the potential area of surface water flooding taking into account the topography and permeability of the area. It also includes factors to take into account drainage provision. This information is designed to be high level and should not be used to indicate specific properties and risk but identify low points and potential flow routing. The mapping indicates that this address is partially within an area at high risk of surface water flooding. High risk means that

each year this area has a chance of flooding of greater than 3.3%, and some parts of the site may flood to a depth of 0.9m.

For more information on this flood risk, please see <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map>

HCC has prepared Surface Water Management Plans which are available on our website. For more detailed information on flooding in the Winchester City Council administrative area, please see their Strategic Flood Risk Assessment, which can be found at <https://www.winchester.gov.uk/planning-policy/winchester-district-local-plan-2011-2036-adopted/evidence-base/environment/strategic-flood-risk-assessment-2007>.

Flood risk from watercourses

Watercourses are any natural or artificial channel above or below ground through which water flows. Watercourses are classified as either 'Ordinary Watercourse' or 'Main River'. Ordinary watercourses are watercourses that are not part of a Main River and include streams, ditches, drains, culverts etc. through which water flows. The Lead Local Flood Authority (LLFA - in this instance Hampshire County Council) are responsible for managing the risk from ordinary watercourses and have powers to ensure maintenance is undertaken by the relevant body, usually the adjacent landowner. For more information, see <http://documents.hants.gov.uk/flood-water-management/HCCFloodRiskManagement-Landowners.pdf>.

Main Rivers are typically larger streams and rivers, but some are smaller watercourses of local significance. Main Rivers are nationally managed by the Environment Agency, but responsibility for maintenance remains with the landowner.

There is one Main River within 250m of this site. Known Ordinary watercourses are marked on the attached map(s); however it should be noted that many ordinary watercourses are not recorded centrally (such as small ditches etc.). The site is located within the water body catchment of the River Test.

For more information regarding fluvial (river) and tidal flooding and flood risk please contact the Environment Agency or refer to the following website: <https://flood-map-for-planning.service.gov.uk/>

Ordinary Watercourse Consenting

Hampshire County Council is responsible for issuing Ordinary Watercourse Consents. These consents assess the flood risk of proposed changes (both permanent and temporary) to ordinary watercourses and are a legal requirement of such work. We have no records of Ordinary Watercourse Consents (OWCs) within the search area.

Please refer to the Hampshire County Council OWC website for further information and the forms for consents:

<https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/change-watercourse>

The consenting process has a statutory timeframe of two months from when the application is validated. To request data relating to consents prior to 2012 please contact the EA on: psohiow@environment-agency.gov.uk

Any works proposed within eight metres of a main river are likely to require a flood risk permit from the Environment Agency. Please refer to the following for further information: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>

Flood risk from sewers

For information regarding foul flooding, please contact Southern Water.

Vulnerability of site from groundwater

Groundwater is by definition hard to predict and difficult to manage. The geology of the site in question is primarily Newhaven Chalk Formation chalk overlain by Head clay, silt, sand and gravel.

Hampshire County Council hold up to 22 records of groundwater flooding in the area, however this does not necessarily mean that other flood events have not occurred. It can be difficult to define flooding as a result of groundwater particularly in those areas where silt, gravel and sand can lead to a perched watertable which can prevent infiltration drainage from working as opposed to being a groundwater emergence flood event which tends to be seen linked to chalk aquifers.

Please note this information should only be used to establish relative, but not absolute, risk of groundwater flooding. A more detailed assessment including groundwater monitoring may be required.

More detailed information is available in relation to potential groundwater flood risk from the British Geological Society however it should be noted that this is a chargeable service. For further information please refer to:

<https://www.bgs.ac.uk/research/groundwater/datainfo/GFSD.html>

Hampshire County Council has a draft Groundwater Management Plan that is available on our website which contains useful information. It can be found at:

<https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/strategies/groundwater-management-plan>

Environmentally designated sites

We note that the site is not within 250m of designated environmental sites:

Drainage Assets

We do not hold information in relation to private or third party drainage assets but are aware that Hampshire County Council as Highways Authority are responsible for many assets within and draining the Highway.

It is the responsibility of Hampshire Highways to maintain their assets on the highway, and they are on a regular cleansing schedule. If there are any issues with any highway gullies, soakaways, culverts etc. from a maintenance perspective, this can be flagged on the online system:

<https://www.hants.gov.uk/transport/roadmaintenance/roadproblems>

If flooding issues are reported to Highways and are in relation to Highway infrastructure, we as LLFA may not have access to these records and you may need to place a request for this information using the above link.

If you have any further queries, please contact the Flood and Water Management (FWM) Team quoting the above reference

Kind regards

FWM Team
fwm@hants.gov.uk

Please Note: The data supplied has been compiled from a variety of sources of varying reliability. The data is constantly being revised and validated to ensure the highest accuracy possible. However, the data should not be relied upon or considered completely accurate and the data is provided on the understanding that neither the County Council nor the disclosing officer is to be held responsible should you rely on this data and consequently suffer damage.

This response has been provided using the best knowledge and information submitted as part of the planning application at the time of responding and is reliant on the accuracy of that information.

Hampshire County Council defines significant flooding as 'flooding that affects 20 or more properties internally in one flood event within the same location OR flooding that affects significant lengths of highways affecting 20 or more properties and lasts for a period of 3 hours from the onset of flooding'. For more information on how we define flooding, please see our guidance on our website <http://documents.hants.gov.uk/flood-water-management/FloodInvestigationsguidance.pdf>

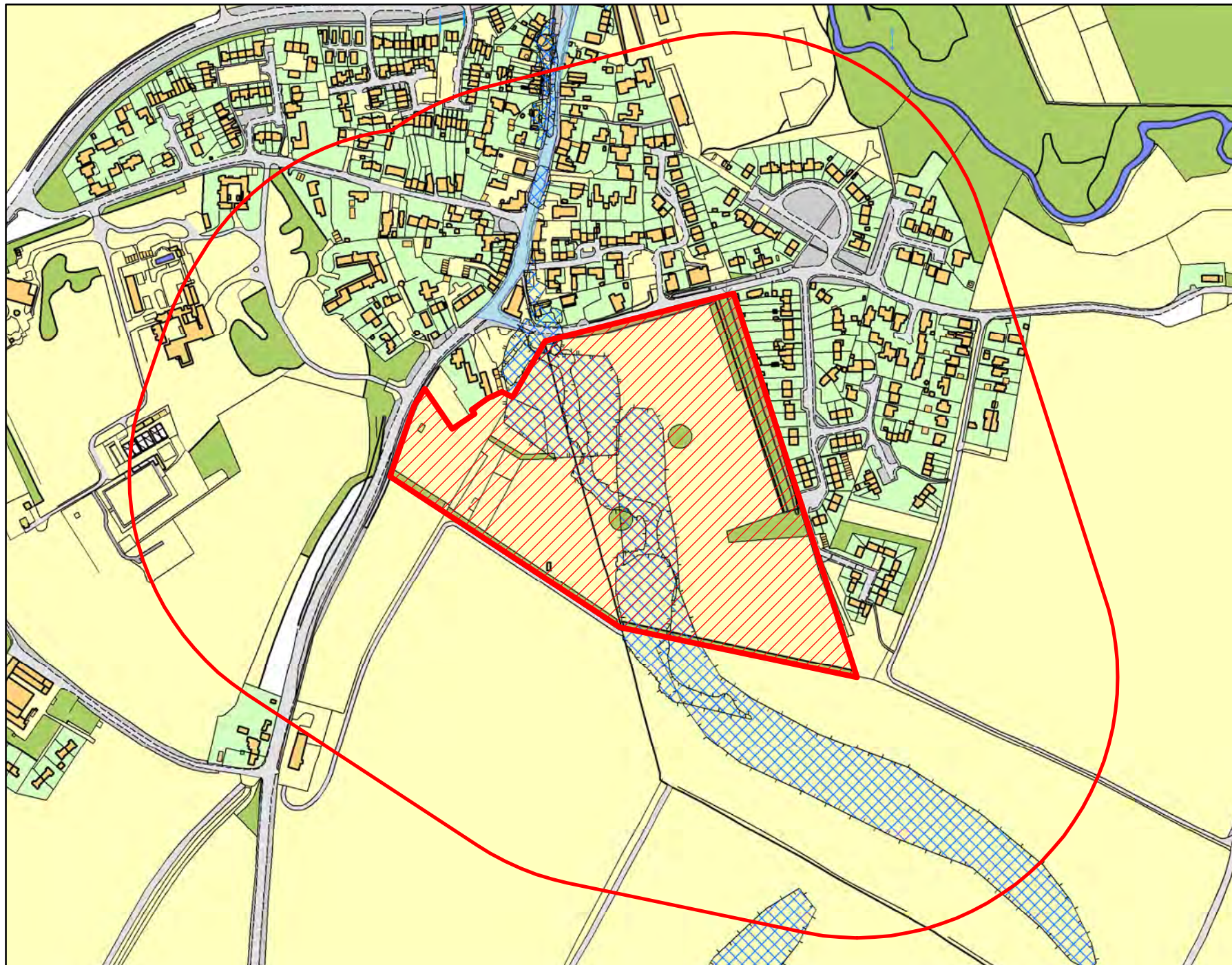
You may find the following websites useful –

- <http://bluepages.org.uk/>
- <https://nationalfloodforum.org.uk>
- <https://nationalfloodforum.org.uk/about-flooding/reducing-your-risk/protecting-your-property/>
- http://hummedia.manchester.ac.uk/institutes/mui/cure/research/documents/Property_owners_booklet_web_000.pdf (linked from the National Flood Forum)
- <https://www.floodre.co.uk/>







Users' Disclaimer

I understand that in using advice provided by the Hampshire Flood and Water Management Team I am aware of the following:

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- 2.** Advice provided by the Hampshire FWM Team will only be used for the purpose stated and will not be stored beyond the life of the project for which it was acquired.
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- 4.** Whilst every reasonable effort is made to validate information supplied to and by the Hampshire FWM Team owing to the dynamic and judgmental nature of information relating to flooding, the Hampshire disclaims any responsibility for the accuracy or comprehensiveness of the information supplied, and accepts no liability for any indirect, consequential, or incidental damages or losses arising from use of the information.
- 5.** I am aware of the Hampshire FWM Team charging schedule and understand I may be charged for the advice.
- 6.** All web links are accurate as on the day they were accessed.



Legend

-  Site
 -  250m Buffer
 -  EA Recorded Flood Outlines
 -  Recorded Highway Flooding in Hampshire
- Hampshire Flood Enquiries**
enq_status_name
-  No Maintenance Work Required
 -  Historic Flood Map

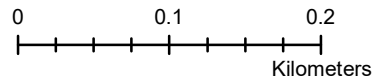
Historic Flood Information Request

Historic Flood Records

Hathor Property Ltd

Land South of Wonston Road, Sutton Scotney

Notes:

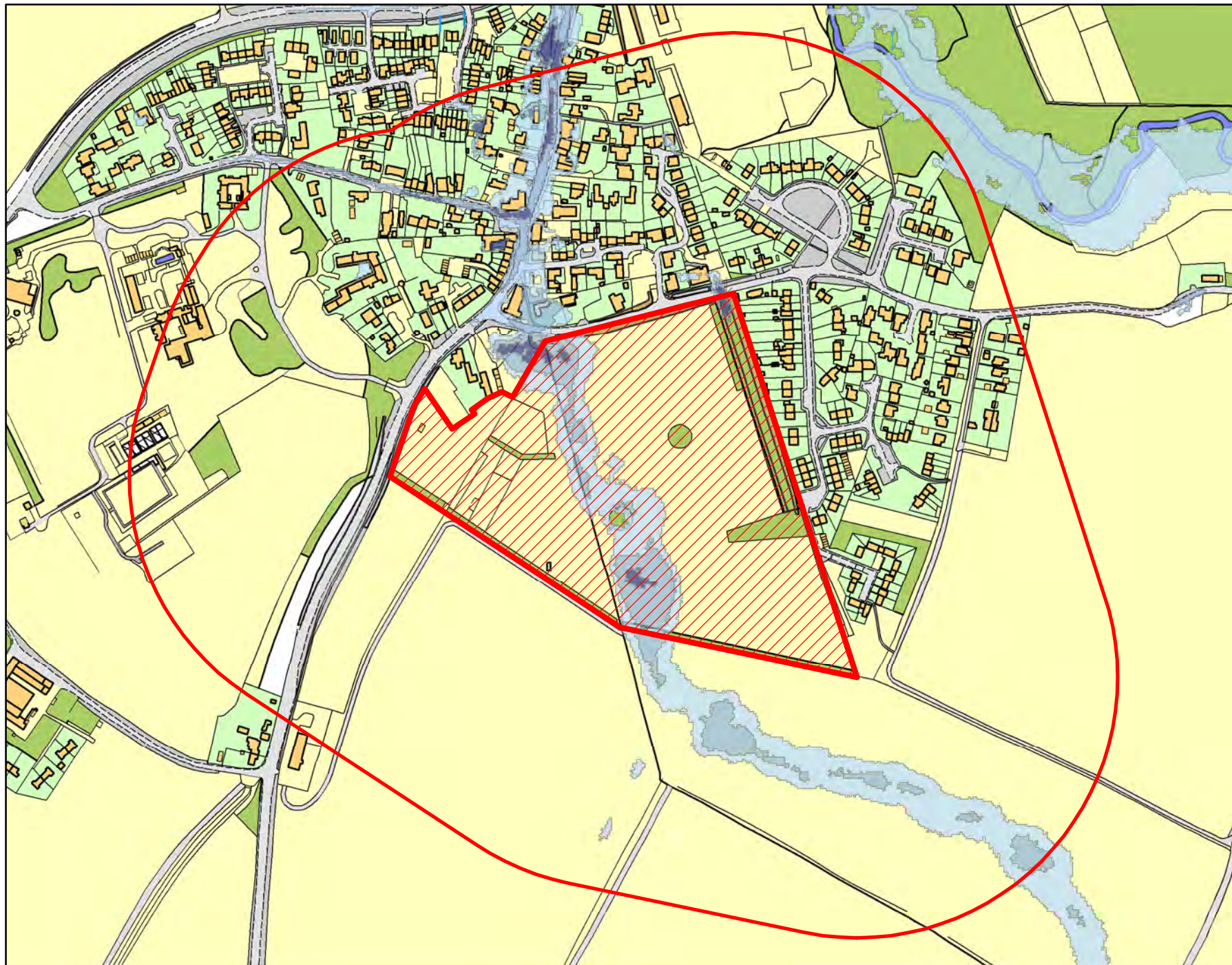







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Date:	03/04/2023	Sheet:	1 of 1
Revision:	1	Initials:	TC





- Legend**
-  Site
 -  250m Buffer
 -  Flood Maps for Surface Water (High)
 -  Flood Maps for Surface Water (Medium)
 -  Flood Maps for Surface Water (Low)

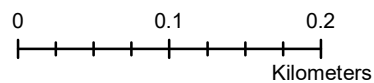
Historic Flood Information Request

Flood Map for Surface Water

Hathor Property Ltd

Land South of Wonston Road, Sutton Scotney

Notes:

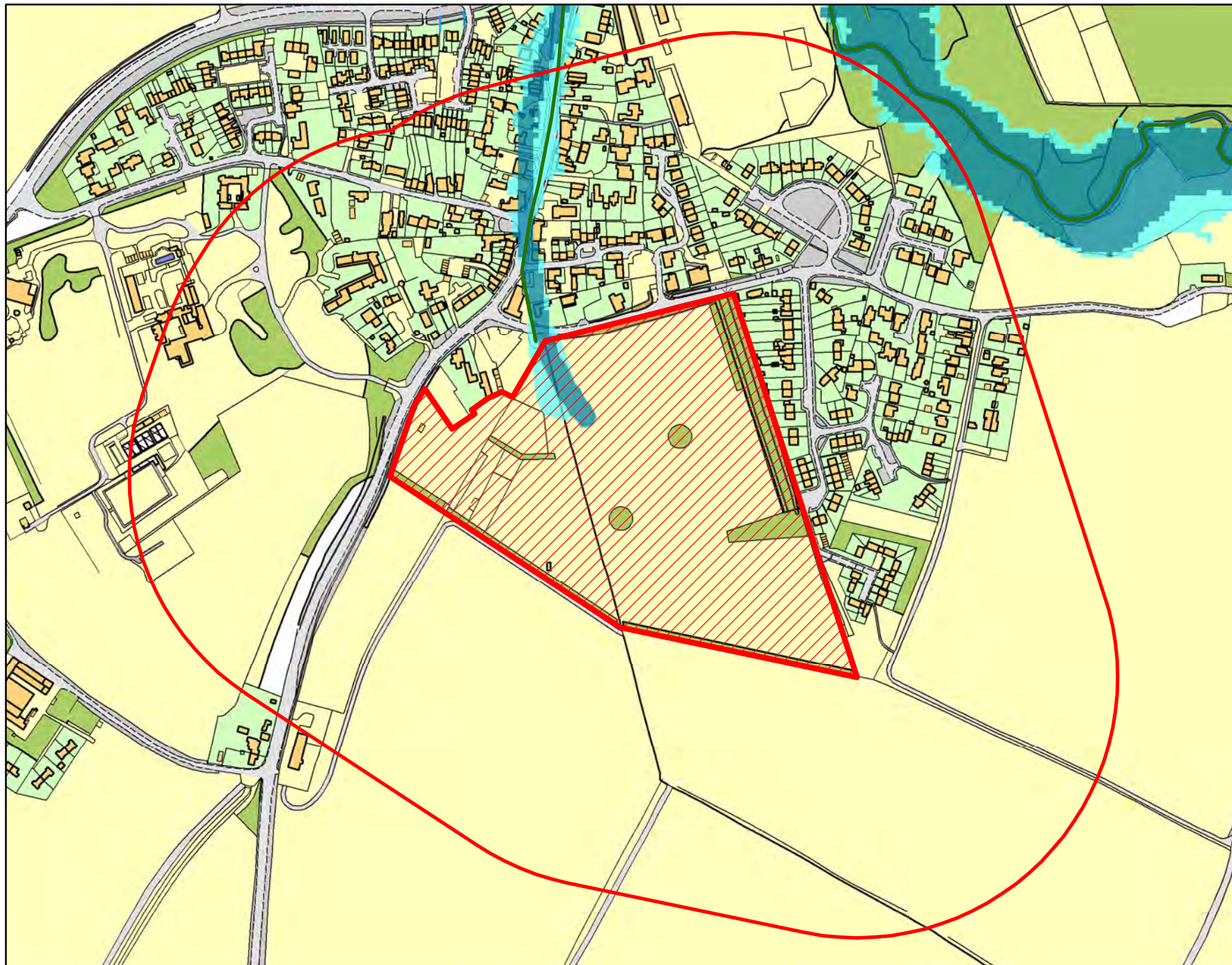


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Revision:	1	Initials:	TC





Legend

- Site
- 250m Buffer
- non main river

mainriv

- FRM Indicative Main River
- Flood Zone 3
- Flood Zone 2

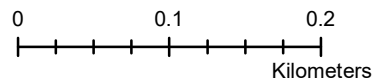
Historic Flood Information Request

EA Flood Zones and Detailed River Network

Hathor Property Ltd

Land South of Wonston Road, Sutton Scotney

Notes:

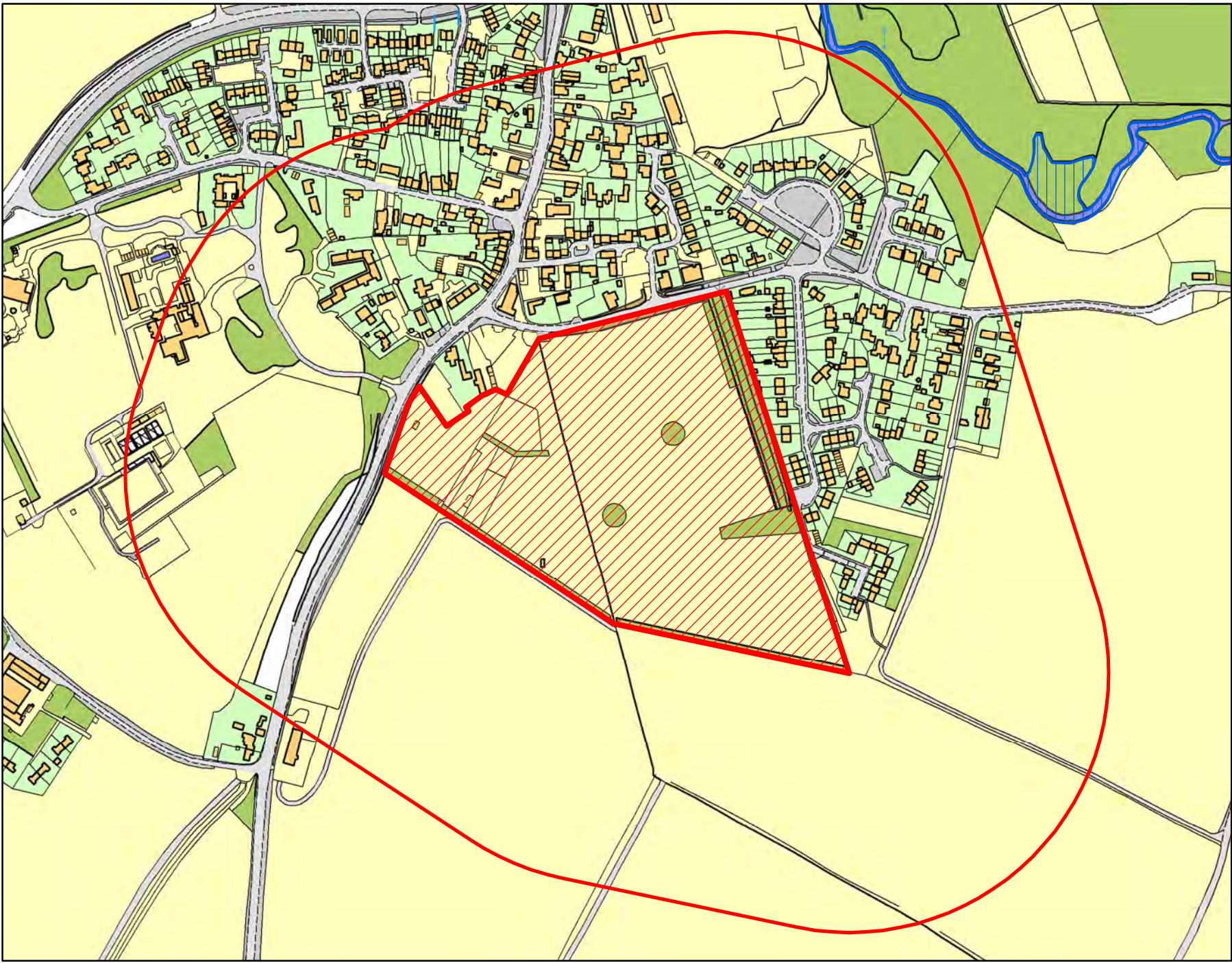





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Revision:	1	Initials:	TC





- Legend**
-  Site
 -  250m Buffer
 -  SSSI (Sites of Special Scientific Interest)

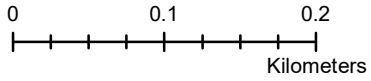
Historic Flood Information Request

Environmental Designations

Hathor Property Ltd

Land South of Wonston Road, Sutton Scotney

Notes:



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Date:	03/04/2023	Sheet:	1 of 1
Revision:	1	Initials:	TC



From: Woodward, George
Sent: 30 March 2023 12:10
To: [REDACTED]
Cc: West, Otilie
Subject: RE: Sutton Scotney

Hi George, my colleague Otilie asked me to contact you about the culvert in Sutton Scotney.

I've uploaded a copy of the latest CCTV report we have for the culvert to <https://ea.sharefile.com/d-s4fabf8f8849e42b78324f52a4ffac08c> (this link expires in 30 days time). This has information about the pipe diameter and culvert condition which is hopefully of use.

We own and maintain a trash screen at the entrance to the culvert south of Victoria Hall, and also maintain a short section of the open watercourse south of the petrol station, but otherwise we don't own or operate any other structures in Sutton Scotney.

You'll still need a Flood Risk Activity Permit for any physical works to the culvert or within 8 metres of it. An application for a permit can be made direct to my team instead of through the NPS – contact details below.

There is advice and guidance on applying for a permit at <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>.

When you are ready to apply for the permit, please complete the following steps:

1. The application forms can be found at <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits#bespoke-permits>. You will need to complete forms A, B and F3.
2. Complete a risk assessment using the guidance at <https://www.gov.uk/guidance/flood-risk-activity-risk-assessment-for-your-environmental-permits>
3. Write a management system using the guidance at <https://www.gov.uk/guidance/develop-a-management-system-flood-risk-activity-for-environmental-permits> – this should describe your method of work, dimensions, equipment/machinery used and what you'll do to manage risk.
4. Send any additional documents that you think will be beneficial in determining the permit, e.g. site plans, diagrams, photos.

Once you have completed the above, please send your application and relevant documents to psohiow@environment-agency.gov.uk.

After you apply

The Environment Agency will tell you if your application is 'duly made', meaning it has the information it needs to start the assessment process. It may still request more information from you. The Environment Agency may reject your application if:

1. you haven't used the right forms
2. you've forgotten to include the fee or sent the wrong fee
3. you haven't provided all the necessary information

The Environment Agency will tell you if it approves your application.

You'll normally get a decision within **2 months** if your application relates only to flood risk activities.

Application charge

Once the EA receive your application, one of our officers will determine the cost of the permit. We will get in contact to let you know the appropriate fee.

Payment by credit or debit card is preferable as we receive instant payment confirmation. Payment by BACS or cheque can result in delays in processing the application as we are required to request payment confirmation from our external finance team.

I'm happy to provide further advice once you have further details available.

Best regards,
George

George Woodward
Flood and Coastal Risk Management Officer - Hampshire and Isle of Wight
Environment Agency

Part-time: my normal working days are Tuesday to Friday

Office address: [REDACTED]
Email: [REDACTED]



From: George Locke [REDACTED]
Sent: 23 March 2023 16:42
To: West, Otilie [REDACTED]
[REDACTED] Reid [REDACTED]
Subject: RE: Sutton Scotney

You don't often get email from floodriskglnk@gmail.com. [Learn why this is important](#)

Otilie,
That was a rapid response, thank you.
We had assumed we would have the NPS team comments as part of the Pre-App.
We can of course undertake a separate pre-app with them.
There is however the residual hazard that we need to consider hence we wanted to have a greater understanding of how the EA are operating the culvert through Sutton Scotney.
Is it possible to have a discussion with someone on that topic?
Reason: I am not sure whether the NPS would have the full information on the culvert itself?

George
[REDACTED]

Ark Environmental Consultancy Ltd

www.floodriskassessment.net

We don't just do Flood and SUDS: we cover all Environmental disciplines. All stages: Planning, Feasibility, Conditions Discharge, Construction Stage

From: [West, Otilie](#)

Sent: 23 March 2023 16:34

To: [George Locke](#); [PlanningSSD](#)

Cc: [Fred Schiff](#); [Henry Reid](#)

Subject: RE: Sutton Scotney

Hi George,

Having looked at your technical note, I believe this should be dealt with our permitting team who will be able to comment on anything relating to discharges to the culvert, and development within 8m of a main river/ culvert.

In terms of flood risk, as this site is entirely flood zone 1 for risk of flooding from rivers and seas, we won't have any comments. We do not comment on surface water flooding, this falls under the LLFA's remit.

You can get in touch with the permitting team for pre-app advice by contacting SSDEnquiries@environment-agency.gov.uk or the National Customer Contact Centre [03708 506506](tel:03708506506).

Non-mains Drainage

I noticed that it is proposed for the development to use a package septic system, however if the development has more than 10 dwellings, we would expect the development to connect to mains drainage.

Government guidance contained within the National Planning Practice Guidance (Water supply, wastewater and water quality – considerations for planning applications) sets out a hierarchy of drainage options that must be considered and discounted in the following order:

1. Connection to the public sewer.
2. Package sewage treatment plant (adopted in due course by the sewerage company or owned and operated under a new appointment or variation).
3. Septic Tank.

Foul drainage should be connected to the main sewer. Where this is not possible, under the Environmental Permitting (England and Wales) Regulations 2016, any discharge of sewage or trade effluent made to either surface water or groundwater will need to be registered as an exempt discharge activity, or hold a permit issued by the Environment Agency. This applies to any discharge to inland freshwaters, coastal waters or relevant territorial waters.

Please note that the need for an environmental permit is separate to the need for planning permission. The granting of planning permission does not necessarily lead to the granting of a permit.

I hope this is of use, but don't hesitate to get in touch if you have any further queries.

Kind regards,

Otilie West MSc BSc
Sustainable Places Advisor | Sustainable Places | Solent & South Downs
Environment Agency | Romsey Office
Canal Walk | Romsey | SO51 7LP

My preferred pronouns are *She/Her* ([What is this, and what are preferred pronouns?](#))

Please accept my thanks for your email in advance - each person sending one less 'thank you' email a day would save more than 16,400 tonnes of carbon a year!

See what the Environment Agency is doing to tackle climate change:

[Environment Agency: reaching net zero by 2030 - GOV.UK \(www.gov.uk\)](#)



.....Please consider the environment before printing this email.



From: George Locke [REDACTED]
Sent: 22 March 2023 23:03
To: PlanningSSD [REDACTED]
Cc: West, Otilie [REDACTED]; Fred Schiff
[REDACTED]; Henry Reid [REDACTED]
Subject: RE: Sutton Scotney

Some people who received this message don't often get email from floodriskglnk@gmail.com. [Learn why this is important](#)

Summary: proposed residential development area in FZ1 and No – Low surface water hazard with only option to discharge at greenfield to the culvert but this does have betterment because we can include an allowance for climate change in the attenuation; connection to the culvert would be on land in our ownership.

Greater detail in the technical note.

Many thanks,

George

[REDACTED]
Ark Environmental Consultancy Ltd
www.floodriskassessment.net

We don't just do Flood and SUDS: we cover all Environmental disciplines. All stages: Planning, Feasibility, Conditions Discharge, Construction Stage

From: [PlanningSSD](#)
Sent: 16 March 2023 09:51
To: [George Locke](#)
Cc: [West, Otilie](#)
Subject: RE: Sutton Scotney

Hi George,

Thank you for your email.

Please could you send over a copy of the technical note, and also let us know what you plan on doing regarding the culvert? We need to have a look at the documents to understand who we need to consult within our team, and then we can look at the best step forward regarding charged advice.

Many thanks,

Sustainable Places Team | Environmental Planning and Engagement | Solent and South Downs Environment Agency | Chichester Office, Oving Road, Chichester, West Sussex, PO20 2AG
Email: [REDACTED]

Please accept our thanks for your email in advance - each person sending one less 'thank you' email a day would save more than 16,400 tonnes of carbon a year!



From: George Locke <floodriskglnk@gmail.com>
Sent: 13 March 2023 14:43
To: PlanningSSD <PlanningSSD@environment-agency.gov.uk>
Subject: RE: Sutton Scotney

You don't often get email from floodriskglnk@gmail.com. [Learn why this is important](#)

Are you able to confirm your costs for a Pre-App with you on this site, please.
See my email of the 7th March 2023 below.
Thanks.

George

[REDACTED]
Ark Environmental Consultancy Ltd
www.floodriskassessment.net

We don't just do Flood and SUDS: we cover all Environmental disciplines. All stages: Planning, Feasibility, Conditions Discharge, Construction Stage

From: [Planning_THM](#)
Sent: 08 March 2023 09:00

To: [George Locke](#); [Enquiries_THM](#); [PlanningSSD](#)

Subject: RE: Sutton Scotney

Dear George,

This proposal falls under our Solent and South Downs area so I have copied the Solent and South Downs Sustainable Places team into this reply.

Kind regards

Sarah

Sarah Warriss-Simmons

Planning Advisor | Sustainable Places | Thames Area

Please note my working days are Tuesday to Thursday

Environment Agency | Red Kite House, Howbery Park, Benson Lane, Crowmarsh, OX10 8BD

Telephone [REDACTED]



Creating a better place
for people and wildlife



From: George Locke [REDACTED]

Sent: 08 March 2023 08:16

To: Enquiries_THM [REDACTED]

Cc: Planning_THM [REDACTED]

Subject: FW: Sutton Scotney

Just in case the THM office is too busy: please see below request for paid for Pre-App for a scheme at the site below.

George

[REDACTED]

Ark Environmental Consultancy Ltd

www.floodriskassessment.net

We don't just do Flood and SUDS: we cover all Environmental disciplines. All stages: Planning, Feasibility, Conditions Discharge, Construction Stage

From: [George Locke](#)

Sent: 07 March 2023 22:10

To: [Planning_THM](#)

Subject: Sutton Scotney

Dear EA,

Please can you confirm your costs for a Paid For Pre-App with you on the site at Sutton Scotney.

As per the location plan on your website map for planning below.

We would provide a technical note with the flood risk background and some queries as to the site and scheme specific requirements for a forthcoming planning application.

We require some additional data from the EA on the culvert operation also.

Please confirm the fee and a date for a possible meeting if deemed necessary.



George

[Redacted]

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From: Fred Schiff
Sent: 18 April 2023 08:47
To: Simon Packer; George Locke
Cc: Henry Reid
Subject: Fwd: Southern Water - Archaeological Survey Access [CJO-WorkSite.FID369794]

Looks positive.....

Begin forwarded message:

From: Toby Swindells [REDACTED]
Subject: Southern Water - Archaeological Survey Access [CJO-WorkSite.FID369794]
Date: 14 April 2023 at 15:44:20 BST
To: Iain Curry [REDACTED], Fred Schiff [REDACTED]

Dear Iain and Fred,

SOUTHERN WATER – SADDLERS CLOSE AND GRATTON CLOSE WTW PUMP AWAY SCHEME

I am writing to follow up previous discussions regarding the above proposed pipeline project. Following on from the magnetometer surveys of the entire route corridor that were carried out at the start of 2023, Southern Water's designers have developed a design for the scheme.

Before the construction methodology can be finalised, ground conditions in the area must be checked for suitability by carrying out various intrusive surveys. These include trial trenching, trial pits and boreholes to examine soil and subsoil structure and further trenches to look for any archaeological features.

Please find the attached covering letter, notice, plans and Southern Water's Code of Practice, a hard copy of which has been sent in the post today. These documents provide further information regarding the upcoming surveys and access requirements. As mentioned in the letter, I will be in touch as soon as I have further information regarding the time and date of these surveys.

If you have any queries, please do not hesitate to contact me.

Kind regards

Toby

Classification L2 - Business Data

Toby Swindells (he, him, his)
Graduate Surveyor

Carter Jonas

T: 01962 833387 x 2241 | M: 07799348728 | carterjonas.co.uk
3 Royal Court, Kings Worthy, Winchester, SO23 7TW



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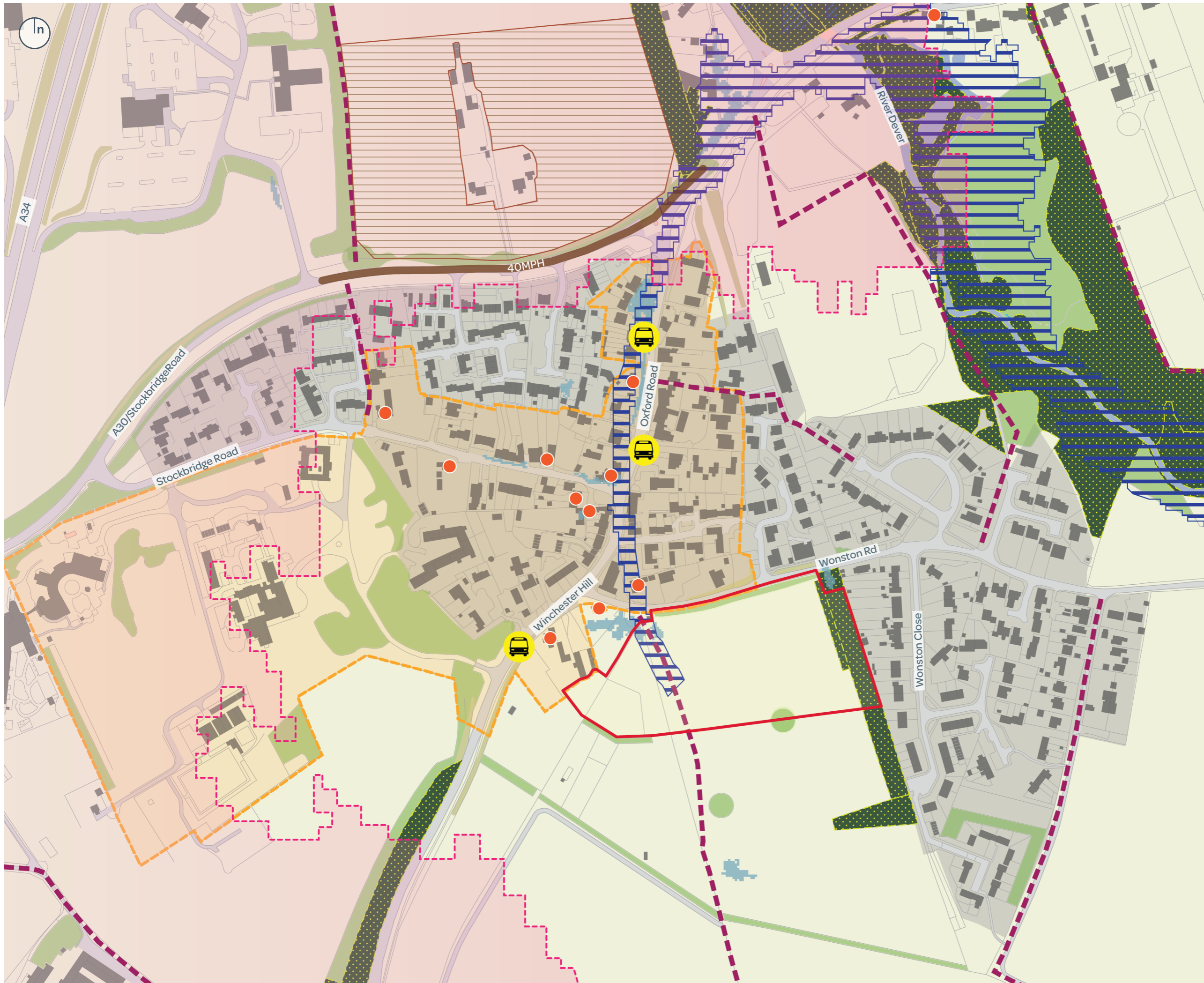
Classification L2 - Business Data

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Appendix 6 – Site Surroundings and Features Plan (Turley)



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- KEY**
- Site Boundary (Circa 50-60 Homes)
 - Public Rights of Way (PRoW)
 - A30-Major Pedestrian Barrier to Movement
 - Noise Levels (55 dB and over)
 - Bus Stops
 - Existing Trees
 - Priority Habitat
 - Conservation Area
 - Listed Buildings
 - Surface Water Flooding
 - Flood Zone 3
 - Settlement Boundary
 - Brightland Site (Circa 90 Homes)

CLIENT:
 Hathor Property Ltd.

PROJECT:
 Land south of Wonston Road, Sutton Scotney

DRAWING:
 Site Surroundings - Feature Plan

PROJECT NUMBER:
 3005

DRAWING NUMBER: 2001 **CHECKED BY:** KR/JN

REVISION: 00 **STATUS:** Final

DATE:
 September 2024