



**EXAMINATION OF THE
WINCHESTER
DISTRICT LOCAL
PLAN 2020-2040**

**MATTER 8:
DEVELOPMENT
ALLOCATIONS THE
MARKET TOWNS AND
RURAL AREAS
(MTRAS)**

**SUTTON SCOTNEY
POLICY SU01 LAND
AT BRIGHTLANDS**

On behalf of Wates Developments Ltd.

April 2025

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1.0 INTRODUCTION

- 1.1 This statement is submitted on behalf of Wates Developments Ltd. ('Wates') in relation to the Examination in Public of Winchester City Council ('the Council') Local Plan 2020-2040 ('the Local Plan'). Carter Jonas LLP is instructed by Wates.
- 1.2 Wates is promoting the development of land on the northern edge of Sutton Scotney ('the site'). The site is identified in the 'Regulation 19' consultation draft of the Local Plan under draft Policy SU01 'Land at Brightlands'
- 1.3 Wates has been supportive of the preparation and principal direction of the key elements of the plan. Wates supports the overall strategy and the aim to provide a stable policy context for developers to help deliver much needed housing across the Local Plan area in a sustainable manner.
- 1.4 Wates made representations in response to the consultations held on the informal (Regulation 18) Plan and the Publication Plan (Regulation 19) consultation on the Local Plan.
- 1.5 In this submission, Wates sets out its responses to: **Matter 8: Development Allocations the Market Towns and Rural Areas (MTRAs)**, where is specifically relates to **Policy SU01 'Land at Brightlands.'**

Background

Wates Development Ltd.

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

Site Context

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

Master Plan with respect to flood risk and drainage, heritage, landscape and visual impact, ecology, highways and access.

- 1.11 Wates has undertaken technical assessment of the environmental and technical features of the site which confirm that there are no significant physical, environmental or technical constraints that would preclude the development of the site for residential use.

Site Vision and Development Benefits

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

2.0 ISSUE: WHETHER THE PROPOSED HOUSING SITE ALLOCATIONS IN MTRAS WOULD BE JUSTIFIED, EFFECTIVE AND CONSISTENT WITH NATIONAL POLICY.

Sutton Scotney

Policy SU01 Land at Brightlands

1. ***Give that this site would be outside the existing settlements boundary and the presence of the A30 road, what is the evidence to justify the location of this site in relation to the settlement of Sutton Scotney to further the aims of Plan policy SP1?***

- 2.1 The site is located to the north of Stockbridge Road West (A30), and east of the A34 and Sutton Scotney service station. There is built form to the east and west of the site, and as such, in plan form at least, the site is not incongruous. Inevitably, for the Council to meet its housing needs – both as set out in this Local Plan, and the increases which are included in the new Standard Method – some green field sites adjacent to settlement boundaries will need to be allocated for development, and as a consequence the settlement boundaries will need to be changed. Moreover, as is set out in the NPPF at paragraph 89 of the NPPF is states that:

...The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist

- 2.2 Also, at paragraph 109 of the NPPF is explains that:

The planning system should actively manage patterns of growth in support of these objectives [of para. 108 to manage transport impacts]. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

- 2.3 The centre of Sutton Scotney is approximately 400m 'as the crow flies' to the south of the site, within a comfortable walk and cycle distance.
- 2.4 A pedestrian dropped kerb crossing point is also proposed to the west of the site to allow pedestrians to cross Stockbridge Road West, this will provide a link between the two PRoW. The internal layout will connect to existing PRoW which runs along the western boundary of the site, for the benefit of existing users and new communities.
- 2.5 Opportunities exist for the proposed footway on the north side of Stockbridge Road West (along with the existing footway on the south side) to be widened and upgraded to provide a footway/cycleway.
- 2.6 Integration of the site with existing walking and cycling routes and bus stops will ensure genuine active and sustainable travel opportunities are available to future residents to access everyday amenities in Sutton Scotney.
- 2.7 There are a number of local amenities in Sutton Scotney, which are accessible by more active and sustainable travel options, including a convenience store, a doctor's surgery, two day nurseries and a number of recreational/leisure facilities. The site is located close to a network of good sustainable transport links including Public Rights of Way (PRoW), pedestrian and cycle routes. These provide

access to existing bus stops along Oxford Road, which benefit from regular services between Winchester and Whitchurch.

- 2.8 Therefore, it is entirely robust and sound to allocate land at Brightlands, and it is compliant with both the NPPF and the vision, objectives and spatial strategy of the Local Plan.

2. A number of site constraints have been identified including flooding and drainage, sewerage capacity, archaeology, access and road safety, biodiversity, use of best and most versatile land, off site infrastructure requirements, and noise. Would any site constraints be a barrier to delivery of this site in the Plan period?

- 2.9 Wates is aware of constraints on the site but is firmly of the view that none are a barrier to delivery. A team of technical experts has reviewed, and assessed, the site and suggests that it is deliverable; constraints can be managed or mitigated. At Appendix A, is a vision document which summarises the deliverability of the site, and Appendix B is a layout which demonstrates how 120 dwellings can be included in the scheme, and at Appendix C some detail and updates are given on specific matters.

3. As this is a greenfield site a phasing restriction is included in Plan policy SU01ii. What is the evidence to justify this approach in relation to this site?

- 2.10 Offsite re-enforcement works at Harsteock appear to form the basis of the phasing requirement in the policy. It is clear from the Statement of Common Ground between the Council and Southern Water that works have progressed significantly. Wates is therefore of the view that delaying housing delivery on the site is unjustified as it would artificially limit delivery of the site. This issue is especially acute should additional capacity become available or if works are accelerated.

4. Given identified site constraints, what is the evidence that the site allocation would be viable based on the indicative capacity?

- 2.11 Wates is confident that the site can be delivered, and the constraints can be managed and mitigated where necessary as set out above.
- 2.12 The Council has produced a Local Plan Viability Report (LPV01) and this demonstrates that the Local Plan and development sites allocated within it – under ‘typologies’ – are broadly viable. While Wates has raised some specific concerns about the detail of the viability work (e.g. cost assumptions on energy efficiency and reducing carbon emissions) it accepts that overall, the assumptions are reasonable and site specific viability assessments will still have the role in development management. Wates is clear that the site as allocated represents a viable and deliverable development proposition, however, inevitably and relatively simply the site has a greater capacity for development, and this would make the economics of the site more positive and make the delivery of infrastructure and affordable housing obligations much easier to deliver.

5. Would Plan policy SU01 be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals, particularly in relation to SU01ix ('design process')?

- 2.13 Wates is content that the Policy writing is generally clear, and the decision maker should be able to use the policy to reach their conclusions. The only caveat to this view is that criteria like ix. could be made clearer by explaining how the 'archaeological assessment' will be used. It is obvious that investigations should be undertaken before any design proposal is 'locked in' and that if constraints are found (however unlikely) these can be designed appropriately into the scheme. However, the specific role of the archaeological assessment and its outputs and conclusions, is not clear, and neither is what the decision maker should do if the archaeological potential is shown to be higher than expected.

6. Plan policy SU01 xi in relation to hydrogeological risks requires a risk assessment. How would it control any impacts on groundwater conditions and levels? In this respect would the policy be effective?

- 2.14 The policy is effective as written because it requires the exercise of a 'risk assessment,' an output of which could be mitigation, or a management plan, or similar. Wates therefore believes that the policy is sound as written, but perhaps it should signpost any potential action as a result of the risk assessment.
- 2.15 Notwithstanding this, Wates has commissioned some early work on the subject, and this has reported that according to DEFRA geospatial data, the site is not located within a Drinking Water Protected Area (Surface Water), Drinking Water Safeguard Zones (Groundwater) or a groundwater Source Protection Zone.
- 2.16 Initial desk based review of ground conditions at the site carried out in 2020 identified the following areas which would be addressed through further investigation and site design/construction methodology:

| Geotechnical Hazard | Qualitative Risk & Consequences | Risk Reduction Methods |
|---|---|--|
| Head Deposits comprising granular material | Sidewall instability during excavation | Use of trench support/shuttering to reduce risk of instability |
| Potential high water table | Running sand (if present). Increased instability of excavations | Assess groundwater conditions |
| Solution features/infilled channels within the chalk | Settlement of ground due to collapse of material into open solution features or infilled with loose/soft material | Carry out intrusive ground investigation and the foundation design to take risk into consideration |

- 2.17 There is the potential for the presence of perched groundwater within Head Deposits above the chalk, however, groundwater levels are unknown at this point and would be confirmed through ground investigation. A hydrogeological risk assessment would be prepared following ground investigation at the site and would ultimately direct the design solutions for the site.

7. *Would requirements in relation to health care be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?*

- 2.18 On this matter, Wates expects the Council to cross refer to its Infrastructure Delivery Plan, which as a 'live' document can be updated as necessary, and that an appropriate financial contribution can be agreed via S106 or CIL

8. *Would the supporting text and policy SU01, in phasing development to align with and drain to the new sewerage infrastructure, be effective in ensuring adequate wastewater and drainage?*

- 2.19 Yes, please see technical update note at Appendix C.