

Response from:

**The Planning Committee of
East Woodhay Parish Council**

to the

Proposed Development at Common Farm by Bewley Homes

Ref 23/01767/OUT

5th September 2023

1. Summary

1.1 The Planning Committee of East Woodhay Parish Council objects to this application for reasons set out below.

1.2 It should be noted that in reaching this conclusion, the Planning Committee of East Woodhay Parish Council has been working collectively with Highclere Parish Council. Whilst many of our reasons for objection may appear the same, each Parish has its own individual reasons for objection and these should be considered independently and carefully. Furthermore, East Woodhay Parish Council wish it to be noted that, at this stage, it has not agreed with or been approached by the developer to take on any responsibility for management of allotments or any other parts of the site in question.

1.3 The application is contrary to the adopted Local Plan policies: SD1, SS1, SS4, SS5, SS6 CN4, CN6, CN7, CN8, CN9, EM1, EM4, EM5, EM6, EM7, EM10, EM12.

1.4 The application is contrary to the East Woodhay Neighbourhood Plan policies: NE1, NE3, NE4, CF2, HO1, HO2, HO3 and TT1.

1.5 This application will not deliver sustainable development.

1.6 This application seeks to build on an area of significant flood risk identified in the BDBC Strategic Flood Risk Assessment, and without demonstrating the required sequential test to justify such proposals in this location.

1.7 This application risks undermining the local plan-making process, as a development of 270 dwellings would be in direct conflict with the existing and emerging local plan of BDBC and the made East Woodhay Neighbourhood Plan.

2. Introduction

2.1 The purpose of this submission is to set out the response of East Woodhay Parish Council (EWPC) to the proposed development by Bewley Homes for 270 homes on land at Common Farm – Ref: application 23/01767/OUT. EWPC may submit further representations in response to comments of consultees and further evidence provided by the applicant.

2.2 The application site is within Hampshire and this response assesses the proposals against the current and emerging planning policies of Basingstoke and Deane Borough Council (BDBC) and the made East Woodhay Neighbourhood Plan.

2.3 The application site is close to the boundary with West Berkshire Council. Whilst the merits of the proposal will be assessed against the planning policies of BDBC, it is appropriate to have regard to the planning policies of WBC given the relationship of the development to Enborne Row and Wash Common and the reliance of the application on the proximity of the two settlements in terms of services and facilities.

3. The Proposal

3.1 Bewley Homes have submitted an outline planning application for “A mixed use community to be delivered in separate phases, including a severable Outline application for up to 270 dwellings (Use Class C3) including dwellings for older people; a 1,600 square metre community building (Use Class F2(b)), a 1200 square metre Health Centre (Use Class E(e)) and a 250 square metre convenience store

(Use Class F2(a)), demolition of Common Farm and associated agricultural buildings, provision of open space, allotments, community gardens, a riverside park/nature trail, drainage attenuation, landscaping and associated infrastructure. All matters reserved, other than detailed access arrangements including new vehicular access onto the A343 Andover Road | Land at Watermill Bridge Andover Road Wash Water Hampshire.”

3.2 The application is in all respects a copy of the application 21/03394/OUT, as revised, which was refused by the Council, with the exception of the deletion of the hybrid application for a first phase and the inclusion in the description as a severable application.

4. Planning Context

4.1 The site is located south of the River Enborne which marks the county boundary between Hampshire and West Berkshire. The built development and access is located within Hampshire. The proposed off-road shared pedestrian/cycleway would be located almost entirely within the West Berkshire Council area.

4.2 The application is submitted having regard to the lack of a five-year supply of housing land within Basingstoke and Deane Borough - as at March 2023, it is 4.7 years. It is proposed that the site could increase the supply of housing. At the same time, it is clear from the application that significant reliance is placed on the site’s relationship with the built-up area of Newbury, in particular access to services and facilities, in seeking to justify it being sustainable development.

5. The Development Plan

5.1 The starting point for a local planning authority (LPA) in considering proposals for development is the Development Plan for the area. Applications should be determined in accordance with it unless material considerations indicate otherwise – ref: section 38(6) of the Planning and Compulsory Purchase Act 2004.

5.2 The NPPF, in para 11, advises that for decision-making, development should be approved which accords with an up-to- date Development Plan. Where a plan does not include relevant policies, or it is out-of-date, permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies of the NPPF taken as a whole.

5.3 The Development Plan for the area within which the application is located comprises the Basingstoke and Deane Local Plan 2011-2029 adopted in May 2016, the East Woodhay Neighbourhood Plan 2023 and the Hampshire Minerals and Waste Local Plan 2013. Given the shortfall in the five-year supply of housing land for the borough, the adopted Local Plan (2016) should not be considered to be up-to-date. However, this does not mean that the current Local Plan policies or those of the Neighbourhood Plan are not relevant. Having regard to paragraph 14 of the NPPF the conflict with the Neighbourhood Plan arising from the proposed development is not outweighed by the benefits put forward.

5.4 East Woodhay Parish is a very rural one with limited facilities available to its existing residents. Those that it does have, at Woolton Hill, are not easily accessed on foot or by cycle and will not be easily accessible on foot or by cycle from the proposed site; the routes are via unlit rural roads with no continuous footways. There is very limited public transport linking the proposed site to Woolton Hill.

6. The Local Plan Policies - Basingstoke and Deane Local Plan 2016

The Plan includes a number of policies which are pertinent to the consideration of the merits of the land at Common farm for development:

6.1 Policy SD1 Sustainable Development

- i. The policy echoes the advice in the NPPF. It supports sustainable development without setting out what is meant by that and what would constitute sustainable development. For the reasons set out below, it is considered that the proposals do not deliver sustainable development.
- ii. The site is promoted on the basis of addressing the shortfall in housing in BDBC area, yet it is located some distance away from the principal settlements of the Borough and the population for which the adopted Local Plan makes provision. Residents of the Borough for whom the housing is intended will most likely live some distance away from the application site. Maintaining those connections such as family and social ties, employment and leisure activities would necessitate trips, mostly by car, given the lack of *genuine* alternatives. This would conflict with the purpose of planning to deliver sustainable development and the transition to a low carbon society. Indeed, it is clear from the submissions in support of the application that the applicant sees the site as one which is in effect an extension to Newbury.
- iii. The site falls within flood zones 1,2 and 3 with part of the site at a high risk of surface water flooding. The Local Plan and national guidance sets out to steer development to areas of lower risk; areas at risk should only be considered if there are no reasonable alternative sites available.
- iv. A sequential test has not been undertaken when clearly there are alternative sites available, such as those previously identified in the review of the Local Plan and BDBC SHELAA available. Indeed, the applicant is promoting a site at Tadley for a similar number of houses, which does not have the same risk of flooding. There are clearly preferable sites available in terms of flood risk; exposing new residents of the proposed development to such a risk is not consistent with delivering sustainable development.
- v. The transport assessment submitted by the applicant's consultants includes projected trips to a range of destinations. Table 7.2 shows that the majority of trips made by residents of the site will be to destinations some distance away, reflecting the site's location as one which is attractive to those who are likely to work away from Newbury. These journeys are likely to be made by car, which does not sit comfortably with the purpose of planning to deliver sustainable development.
- vi. The development of the site will have a detrimental impact on the landscape and character of the area.
- vii. The site is subject to noise from the A34 and A343 which will affect the residents of the proposed development. The submitted noise report advises that a number of properties, when the windows are open in hot weather, would experience internal noise levels above the relevant guidelines. With the forecast for more periods of hot weather, occupants would be exposed to higher noise levels for longer periods of time.
- viii. The applicant is relying upon a shortfall in housing land supply within the district. In that context para 11 of the NPPF is triggered: that there should be a presumption in favour of

sustainable development. EWPC is of the view that the site would not deliver sustainable development for the reasons set out in this submission and, therefore, would not satisfy the NPPF objective of delivering sustainable development.

The Outline Application would be contrary to Policy SD1.

6.2 Policy SS1 Scale and Distribution of New Housing

- i. The policy sets the overall strategy for the provision of new housing in the Borough.
- ii. The proposal is in conflict with:
criterion a) is outside of any defined settlement policy boundaries,
criterion d) the proposal is not an allocated site and
criterion f) the proposal is not an exception site.

The Application would be contrary to Policy SS1.

6.3 Policy SS4 Ensuring a supply of Deliverable Sites

- i. The policy seeks to ensure a five-year supply of sites with priority given to brownfield sites. The approach is qualified by the need to ensure new development does not exacerbate the quality of the Borough's water bodies. The policy sets out the process in the event that there is an issue with the supply of land i.e. a review of the Local Plan, which is currently underway.
- ii. The application site is not allocated under Policy SS3 (Greenfield Site Allocations) and its location adjoining the river Enborne would have an impact on the water course. Further, the application site has not been identified for development in the review of the adopted Local Plan.
- iii. Housing land supply: The current shortfall as at March 2023 is 4.7yrs. The application states that it seeks to help address the current shortfall in housing land supply within BDBC, with addition to the current supply promoted as an important benefit.

However, no information has been submitted in respect of the timescale of delivery of new homes on the site. To inform an assessment of the potential contribution to the supply of housing, research undertaken by Lichfields, has been used. Lichfields, a well-established and respected planning and development consultancy, has published two reports which shed some light on the issue of deliverability. In Start to Finish (February 2020) and Feeding the Pipeline (November 2021) they looked at the timelines of a range of sites from the start of the process of submitting an application to the first completions. However, some of the key points which can be drawn from the reports which are pertinent to the current applications are:

- Regardless of size of site, the average time from granting outline permission to the first completions, was three years from validation of the application; the average was five years.
- The average rate of completions for a single outlet on large sites was 45dpa.
- Sites of 50-99 delivered an average of 27 completions.
- Larger sites 500+ delivered more quickly than sites of 1-99.
- The rate of completions increases as the number of outlets increases, but completions per outlet reduce.
- The rate of completions will be affected by a number of factors outside of the planning process e.g. technical consents from other agencies and market forces.

- iv. The planning application was registered in July 2023. Based on Lichfields studies and assuming only one house-builder and a positive decision in late 2024, it is reasonable to assume that the earliest that the first completions would be delivered would be towards the end of 2027. On that basis, the site would make a limited contribution to the current 5-year local plan land supply shortfall.

The Outline Application would be contrary to Policy SS4.

6.5 Policy SS5 Neighbourhood Planning

- i. The site is located adjoining the Parish of Enborne Row and is within the Parishes of East Woodhay and Highclere in Hampshire. The settlements within those two parishes are not included within the list which have a specific housing allocation, but form part of a large group who are expected to contribute to a figure of 150 dwellings by identifying opportunities for at least 10 homes.
- ii. BDBC as part of the review of the adopted Local Plan published a report regarding the potential distribution of homes. It has established an initial position and East Woodhay Parish has not been allocated a figure.

The Outline Application is contrary to Policy SS5.

6.6 Policy SS6 New Housing in the Countryside

- i. The policy seeks to restrict development outside of the settlement policy boundaries defined in the Local Plan. This proposal does not meet:
 - criterion a) as it does not comprise development appropriate to the site's context
 - criterion b) as it is not a rural exception site for affordable housing
 - criterion c) as it does not lead to the enhancement of the immediate setting
 - criterion e) as it is not a small-scale development and
 - criterion g) it is not allocated for development in a Neighbourhood Plan.

The Outline Application is contrary to Policy SS6.

6.7 Policy CN1 Affordable Housing

- i. The proposed development includes provision for affordable housing in accordance with the policy. However, the existing need for affordable housing in the two Parishes within which the site is located is unlikely to justify the scale of provision being proposed.
- ii. It is understood from the most recent information that the housing need for East Woodhay and Highclere Parishes is 31. In that context, it is assumed that the affordable housing would be offered to those on BDBC's housing register who live elsewhere in the Borough. Further, the sub-regional Help to Buy Register shows that as of 21st March 2023 9 households have expressed an interest in intermediate forms of housing, such as rental schemes and Shared Ownership.
- iii. Households offered a home would potentially be some distance away from established family and social ties and employment, resulting in the need to travel to other parts of the Borough. Given the limited availability of public transport, those journeys would be by private car.

- iv. Such an outcome would suggest that the location is not an appropriate one for affordable housing to help meet the needs of the Borough and would not deliver sustainable development.

The Outline Application is contrary to Policy CN1.

6.8 Policy CN4 Housing for Older People/Specialist Housing

- i. The policy supports the provision of housing specifically designed to meet the needs of older people or specialist accommodation subject to criterion i) meeting a proven need and ii) that the location is appropriate in terms of access to facilities services and public transport.
- ii. The outline proposal includes provision for older persons, but no details are provided as to what type of older person that would comprise. The Design and Access Statement includes an illustrative layout which identifies a site for older people's housing (site 10).
- iii. The lack of easily accessible local services would suggest that the site is not suitable for older persons who do not have a car.
- iv. In the context of the comments made in respect of Policy CN7 and Policy CN9 below, it is considered that the outline proposals are contrary to Policy CN4.

The Outline Application is contrary to Policy CN4.

6.9 Policy CN6 Infrastructure

- i. The policy requires new development to provide and contribute towards the provision of additional services, facilities and infrastructure. The phasing of provision should be prior to occupation of the development or phased where appropriate.
- ii. In the event that permission is granted, a Section 106 agreement would be required to ensure the delivery of all the infrastructure proposed by the applicant. Until such times as that agreement is in place, there is no certainty that it will be provided. The applicant's description of what it proposes is a severable outline application.
- iii. The significance of this change to the previous application is not entirely clear. It would be reasonable to assume that it is intended to provide flexibility to vary any permission granted in respect of the various elements, including the provision of uses intended to support the applicant's assertion that the development would be sustainable. In that context, little weight can be given in the decision-making process to their inclusion at this stage.
- iv. In the event that permission is granted, the conditions and agreements attached should be drafted such that the facilities proposed to support the development are not easily lost in future applications for the site.

The Outline Application is contrary to Policy CN6.

6.10 Policy CN7 Essential Facilities and Services

- i. The policy supports proposals which provide or improve essential facilities and services and sustain the vitality and viability of communities within settlements. Proposals outside would be treated as an exception where they met an identified local need.
- ii. The development is poorly related to existing provision in East Woodhay and Highclere Parishes as it requires a 1.5/2-mile journey to or from the site to either village centre or to Penwood's convenience store. There is no viable pedestrian route to or from any of those destinations owing to a complete lack of footpaths and no street lighting. The majority of trips would be made by car.
- iii. No evidence has been submitted to demonstrate that within East Woodhay Parish, there is a need for the facilities being proposed on the new site. In this context, it is difficult to see how the development would help sustain the existing facilities in East Woodhay Parish. The Parish Council is concerned that the provision of a community building within the proposed development could attract users away from the existing community buildings, resulting in a reduction in income.
- iv. The site is within the catchment area of Woolton Hill infant and junior schools. Children from the proposed development are highly unlikely to walk given the distance - approximately 2.5 miles - and the character of the routes, they would be taken by car. The secondary school for the site is The Clere School at Burghclere, approximately 3 miles away. Journeys to and from the school are likely to be by car or school bus. It is difficult to see how the proposed school travel plan contribution would achieve a significant improvement on the current position.
- v. There are no details of how the proposed health centre would be delivered or how it would relate to existing facilities. If its provision placed the future of others in doubt, then any benefit attributed to it in the decision-making process should be set aside. The applicant's wording of the application suggests that there is no certainty that it would be provided.

The Outline Application would be contrary to Policy CN7.

6.11 Policy CN8 Community, Leisure and Cultural Facilities

- i. The policy comprises a number of criteria which need to be satisfied:
 - a. retain and maintain existing facilities
 - b. improve the quality and capacity of facilities
 - c. provide new facilities where there is evidence of need which cannot be met by existing provision
 - d. are delivered to prescribed timetable and criteria
 - e.-f. focus on the potential loss of existing facilities
- ii. The proposal includes a number of community and leisure facilities. They are proposed to support the contention that sustainable development would be delivered. In respect of the policy, no evidence has been presented to satisfy a)-c) in terms of the capacity of the existing facilities to support the proposed development or what the impact on those facilities would be, as a consequence of the proposed provision on-site e.g. would the new community hall attract users of existing facilities, such that there would be a negative impact on their income.

- iii. There is no indication at what point in the development of the larger scheme, that the community facilities would be provided. Until such time as they were built and opened, all the residents would need to travel to existing facilities elsewhere and those journeys would be by car, given the distances, limited availability of public transport and routes which are unsuitable for pedestrians.
- iv. The description of the application includes the term severable. This suggests that the applicant is seeking flexibility, such that the facilities being proposed may not be delivered. If that is the case then the sustainability merits of the site, without the range of facilities proposed, becomes even more uncertain.

The Outline Application is contrary to Policy CN8.

6.12 Policy CN9 Transport

- i. The aim of the policy is to deliver development which seeks to minimise the need to travel, support sustainable transport modes and support the transition to a low carbon economy.
- ii. The site is poorly related to the existing transport infrastructure which would promote alternative modes of transport to the car within the borough. Access to the nearest services and facilities at Woolton Hill, comprising an infant and junior school, are approximately 2.5 miles away. Access to facilities at Highclere and the secondary school in Burghclere, whose catchment the site is located, is approximately 3 miles away. The routes to both villages have no continuous footway links and no lighting, making them unattractive for pedestrians and children.
- iii. There is a very limited bus service. Any proposals which comprise making a financial contribution should be treated with caution. The previous application proposed a time limited contribution, beyond which there can be no certainty that the service provision supported by that contribution would continue. There is also an issue of when the enhanced service would be provided.
- iv. The focus of improvements to bus services is on routes to and from Newbury, which would not assist developing links to Woolton Hill. It is likely that most journeys to and from the site to access local services would be by car.
- v. The measures proposed to encourage non-car trips are focussed on links north to Wash Common and Newbury. This reaffirms the Parish Council's view that the scheme is poorly related to Woolton Hill.
- vi. The merits of the submitted Transport Assessment as the basis for assessing the impact of the proposed development on the transport network is, in EWPC's view, questionable, as it relies on data collected in 2021. It is now two years later and travel patterns are changing in the post-Covid world. Therefore, the impact of the development cannot be accurately estimated by the data supplied in this application – the Transport Assessment should be revisited and up to date data used.

The Outline Application would be contrary to Policy CN9.

6.13 Policy EM1 Landscape

- i. The policy would only permit development where it is demonstrated that the proposal is sympathetic to the character and visual quality of the area and is not detrimental to the character of the landscape. Development which does not maintain the integrity of existing settlements will not be considered acceptable.
- ii. The site adjoins the North Wessex Downs AONB and contributes to its setting. Traveling south along the A343 Andover Road, the open countryside, including the application site, south of Wash Common provides a distinct contrast to the built development. There are views of the The Chase, National Trust owned woodland south of the A34, from the public right of way which crosses the site, which is in the AONB. The site can be viewed from The Chase which is within the AONB.
- iii. The landscape of the Parish is considered to be one of its most precious assets. The valley of the river Enborne is distinctly different in character to the rest of the Parish, whose main landscape feature is the escarpment of the North Wessex Downs, which rises to Pilot Hill, the highest point in Hampshire. The Enborne is the only river in the Parish and is an important feature on its northern boundary. In the preparation of the Neighbourhood Plan, the residents have highlighted the importance of maintaining the rural character of the Parish by ensuring all development is appropriate in scale and design.
- iv. BDBC commissioned a Landscape Character Assessment (LCA), published in 2021. The application site lies within the Highclere and Burghclere Character Area. The key characteristics relevant to the application site include: “subtle but complex landform steep in places but generally undulating and falling towards the River Enborne in the north dissected by a network of minor tributary valleys. The settlement pattern includes numerous and scattered small villages and hamlets some of probable medieval origin e.g. East Woodhay and Highclere. There is also a proliferation of low density residential properties, mainly located along an extensive network of narrow lanes (ref page 35).
- v. With regard to new development, the LCA advised that it should be associated with existing settlements such as Burghclere, Woolton Hill and Highclere where appropriate. To support the retention of the rural character of the area, low density /ribbon development along the rural lanes should be avoided and potential road lighting schemes should be assessed for their visual impact, to encourage the conservation of the existing dark skies on the skyline.
- vi. The proposals would introduce a scale and form of urban development not found within the character area. It would have no association with the existing settlements of Woolton Hill and Highclere, in terms of scale or form or physical connection. The applicants LVIA recognises the impact on the landscape of the proposals: ‘the introduction of dwellings across a series of pastoral fields will effectively wholly replace the existing character with domestic scale built form’.
- vii. The Parish is close to but is distinctly separate from Newbury. The application site forms part of a rural buffer which is valued by residents. The East Woodhay Neighbourhood Plan recognises the role countryside between settlements plays in maintaining the separate identities of settlements in the Parish. The land at Common Farm together with the adjoining woodland, provides a clear sense of having left one settlement i.e. Wash Common when travelling on the A343 Andover Road, before entering another i.e. Woolton Hill. Development at Common Farm would significantly erode that perception and appreciation of separation.

- viii. The submitted LVIA describes the site as ‘pastoral in character, comprising fields and a farmstead set within a well vegetated framework. It forms a discrete parcel of land, framed by the A34 to the west, Andover Road to the east and the River Enborne to the north.’ It concludes that ‘The built form will result initially in a major adverse effect on both the land use and landscape character of the site, as the existing character cannot be readily recreated.’
- ix. The proposals for large scale development would introduce a scale and form of urban development not found within the character area. It would have no association with the existing settlements of Woolton Hill in terms of scale or form or physical connection.

The Outline Application would be contrary to Policy EM1.

6.15 Policy EM4 Biodiversity, Geodiversity Nature Conservation

- i. The policy seeks to avoid harm to the biodiversity of the borough and sets out a number of criteria which lists those species, sites and features which are important.
- ii. The submitted Ecology Appraisal is based on data collected for the previous application and in terms of best practice is considered to be out of date: e.g. the site appraisal was carried out in 2020 and 2021, the bat surveys in 2020, the tree survey in 2020, the dormouse survey in 2020, water vole survey in 2020 and 2021 and Great Crested Newts in 2020. The baseline data should be updated in line with best practice and fresh assessment undertaken.
- iii. The Appraisal records the presence of a number of species. The site is of ecological value, in particular with regard to the policy is the network of hedgerows. The submitted Ecological Appraisal describes all the hedgerows within the site as likely to qualify as a Priority Habitat ref: para 4.10.4 of the report. The hedgerows within the site form part of a habitat network providing connectivity for wildlife across the site - ref: para 4.10.6. However, the application is in outline form, with the detailed layouts of the development yet to be submitted, so the impact on the hedgerow network cannot be determined with certainty at this stage.

The Outline Application would be contrary to Policy EM4.

6.16 Policy EM5 Green Infrastructure

- i. The policy will only permit development which does not result in fragmentation of the green infrastructure network by severing important corridors/links.
- ii. The Ecological Appraisal submitted in support of the application describes the river Enborne as an important ecological feature, at least of district importance, due to its value as a wildlife corridor. The stream flowing through the site into the river is also considered important – ref: para 4.8.5. of the report.
- iii. The hedgerows within the site form part of a habitat network providing connectivity for movement of wildlife across the site – ref: para 4.10.5 of the report. The NPPF recognises the importance for wildlife of connectivity and the need to establish coherent ecological networks.
- iv. Development within the river corridor of the Enborne would not be consistent with the policy or the Council’s Green Infrastructure Strategy 2013. Development close to the river would

harm one of the Borough's key GI assets and would not protect the health and attractiveness of the natural environment of the Borough.

- v. It would comprise development of a scale which would harm the connectivity of the river Enborne corridor introducing new activity, an urban environment and domestic pets which could prey on wildlife. Furthermore, when the A34 was constructed, access corridors were built under it for wildlife- these will be impacted by the development (ref: criterion b).

The Outline Application would be contrary to Policy EM5.

6.17 Policy EM6 Water Quality

- i. The policy seeks to protect, manage and improve the water quality of the borough's water environment. Where monitoring indicates there is likely to be deterioration in a water body, Policy SS4 is relevant and would be applied to prevent further development which exacerbates deterioration within the catchment.
- ii. Policy EM6 also seeks to protect and improve water quality which is relevant in respect of sites within Source Protection Zones. Development proposals adjacent to a watercourse will need to incorporate measures to protect it. The location of development close to the river Enborne will increase the risk of pollution of it.
- iii. Notwithstanding the lack of objection from Thames Water in respect of the previous application, EWPC remains very concerned about the impact of the proposed development on the river Enborne. The ground conditions of the site present specific challenges to the proposed development, in addition to the potential risk from ground water flooding. The development of the site clearly presents risks which, given the lack of justification in terms of the sequential test and its poor location in terms of delivering sustainable development, are unnecessary risks.

The Outline Application would be contrary to Policy EM6.

6.18 Policy EM7 Managing Flood Risk

- i. The policy seeks to minimise the risk from flooding in terms of the location of development and all greenfield sites are required to manage surface water run-off, to reduce the risk of flooding downstream. The policy follows the guidance in the NPPF in respect of the use of the sequential test and the need to avoid development in areas at risk of flooding.
- ii. In the context of the application site, located in an area at risk of flooding, the sequential test as set out in the NPPF should be applied. The applicants have undertaken a sequential approach to how the site would be developed; this does not satisfy national guidance which requires an assessment of available alternative sites. This has not been done.
- iii. The lack of a sequential test was raised by EWPC in its objections to the previous application.
- iv. The applicant is relying on locating built development outside the areas most at risk of flooding. However, key elements of the proposals including the access road to the western

half of the site, where homes are proposed, the bus turning area and mobility hub and areas of open space are all located in areas at risk of flooding.

- v. BDBC have accepted the applicant's sequential approach. However, the applicant is itself promoting two sites each for a similar number of homes at Tadley and Weybrook Golf Club on the edge of Basingtoke.
- vi. This approach is not one which is set out in national guidance and has not been supported by inspectors at appeals. They have not accepted that a sequential approach to a site's development satisfies the sequential test, ref: appeal decision 3308189, March 2023.
- vii. Inspectors have not accepted the case for separating the means of access from the rest of a proposed development; rather that it is an integral component of a development – ref: appeal decision 3308919 June 2023. The latter appeal decision is of interest, as the inspector considered access to the site - in this particular case a pedestrian route - to be essential infrastructure and therefore the exception test would need to be applied as it was in flood zone 3. The same case could be made in respect of the access road serving the western half of the site in the current application.
- viii. Enborne River Valley Preservation Society (ERVPS) has submitted a separate detailed objection regarding the proposed drainage strategy for the site, dated 6th August 2023. EWPC would ask BDBC to carefully consider it and consult the relevant organisations for their views on it.
- ix. EWPC would also draw attention to the memo of the 9th August 2023 from BDBC Planning Policy to Development Management, pointing out that the council's Strategic Flood Risk Assessment states (inter alia) that:
 - The site falls within Flood Zones 1, 2 and 3.
 - The site is within an area susceptible to groundwater flooding at surface and an area susceptible to groundwater flooding below ground.
 - Given that the site is at risk of flooding, as per the NPPF and policy EM7 in the LP, a sequential test will need to be passed, demonstrating that there are no other sites available at a lower risk of flooding.

The Outline Application would be contrary to Policy EM7.

6.19 EM 10 High Quality Development

- i. The policy requires development to be of a high quality and at 2a), positively contribute to local distinctiveness and 2c) have due regard to the density scale, layout appearance.... of the surrounding area.
- ii. For the reasons set out in respect of Policy EM1, the proposed development would not positively contribute to the local distinctiveness, sense of place and existing street scene. It would be at odds with the existing character of the settlement and its setting (including density, scale, layout, appearance).

The Outline Application would be contrary to Policy EM10.

6.20 Policy EM12 Pollution

- i. The policy permits development provided that it does not result in pollution which is detrimental to quality of life. The supporting text highlights noise, air quality, contaminated land and light pollution all as being issues – also referenced under Policy EM6.
- ii. The Noise Impact Study submitted appears to be the same as the one previously submitted with, it is assumed, baseline data collected in 2021. It was carried out from 3 March 2021 to 9 March 2021 when the country was in full lockdown, including schools being closed; this renders the acoustic survey data unusable and unacceptable, by virtue of underestimating the existing traffic background sound levels. EWPC questions how reliable a document it is given that it is two years since the data was collected.
- iii. The Air Quality Assessment submitted with the application does not appear to have changed significantly from the previous version. It is based on survey data from 2021. It assumes that development for modelling purposes would have commenced in 2023, which is clearly not the case. There is an issue of air quality within Newbury, on the roads providing access to the town centre. The increase in vehicle traffic from the proposed development is likely to add to the existing problems and an updated assessment should be undertaken.
- iv. Both reports should be reviewed following a fresh look at the levels of traffic now being experienced on the A34(T) and A343.
- v. The applicants LVIA concludes that there would be an increase in lighting in the area. The October 2021 night time character of the site and its surroundings is described as 'predominantly dark' with some light from a number of sources.
- vi. On completion when the lighting proposed for the development is operational, the LVIA predicted the magnitude of change to be medium, with the overall effect on night-time character of the site predicted to be moderately adverse.
- vii. The impact of lighting is based on the submitted Lighting Strategy. It appears to confine lighting on columns to the internal access road as far as the community hub, with the pedestrian network lit by solar studs. In terms of encouraging walking and cycling within the site and beyond, one would have expected a much more detailed and comprehensive lighting strategy.
- viii. The lighting strategy is contrary to Policy EM12 and holds no regard for the Dark Skies Policy maintained by the North Wessex Downs AONB and by the EWPC Neighbourhood Plan (see below).

The Outline Application would be contrary to Policy EM12.

6. The East Woodhay Neighbourhood Plan Policies

- i. The East Woodhay Neighbourhood Plan was made on 23rd February 2023 by BDBC. The proposed development is contrary to the following Policies: NE1, NE3, NE4, CF2, HO1, HO2, HO3 and TT1.

- ii. The public's confidence in the planning system, and in particular in a plan-led approach, would be undermined if the application were to be approved, contrary to the recently adopted Neighbourhood Plan, without a detailed assessment of its impact on the relevant policies.
- iii. The NP now forms the most up to date part of the Development Plan and should form the basis for the consideration of proposals for development within the Parish.

7.1 Policy NE1 Protecting the Landscape

- i. The proposed development would not conserve and enhance the landscape, character or biodiversity of the Parish or the setting of the AONB, within which the rest of the Parish sits.

7.2 Policy NE3 Dark Skies

- i. The dark skies of the Parish are a feature highly valued by residents. In terms of dark skies, the Parish lies with the North Wessex Downs AONB, which has the 26th darkest skies out of 326 districts in England.
- ii. The introduction of a large development, lit to current standards, would have a detrimental impact on the character of the area. The East Woodhay Neighbourhood Plan also references the AONB guidance document on lighting which should be followed.

7.3 Policy NE4 Nature Conservation

- i. The policy requires development to endeavour to protect and enhance existing natural features, to enhance biodiversity and it would need to show a measurable net gain for biodiversity.
- ii. It is not clear if the introduction of this development would result in a net loss of biodiversity within the Parish. Unless it can show that it will protect and enhance existing natural features (such as the river Enborne) and enhance biodiversity the development is in conflict with this policy.

7.4 Policy CF1 Community Facilities

- i. Proposals for new facilities outside of the settlement boundary of Woolton Hill would only be supported in exceptional circumstances, where there is a demonstrated community need. Such a need has not been justified and consultation has not taken place with the relevant bodies.

7.5 Policy CF2 Recreation

- i. The policy requires new development to provide recreation opportunities which meet the standards set out in BDBC Green Infrastructure Strategy. These proposals locate a significant amount of open space within areas liable to flood, which significantly diminishes the practical contribution they make to meeting the needs of the new residents. Therefore the proposed development is contrary to this policy.

7.6 Policy HO1 Good Quality Design

- i. The proposed development would not respect the locally distinctive character of the area.

7.7 Policy HO2 Settlement Policy Boundary

- i. The proposed development is outside of the defined settlement boundary of Woolton Hill and is in conflict with the policy as it does not meet criteria a), b) and c).

7.8 Policy HO3 Housing Provision for Older People

- i. The site is poorly located in respect of access to existing services and facilities.

7.9 Policy TT1 The Traffic and Parking Impact of New Development

- i. The policy sets out that development should provide safe and sustainable transport, enabling a reduction in car usage. For reasons set out below, the Parish Council considers that the proposed development is in conflict with the policy.
- ii. The site is poorly related to the rest of the Parish in respect of access to services, facilities and geography. There is little connectivity between Woolton Hill and the site. Residents of the new development would most likely have a greater affinity with Newbury and make only a limited contribution to the community life of the Parish.
- iii. Whilst the proposed transport infrastructure improvements and public transport contributions, appear to address the technical issues raised by WBC, it is clear that it has serious doubts that the site would deliver a sustainable development, despite the revised measures for pedestrians, cyclists and public transport.
- iv. In consultation response to the previous application, the view is expressed that there would be a low level of use by pedestrians and cyclists of the proposed links because for both, the majority, if not all, of the facilities listed in the Transport Assessment are at the upper end of the CIHT guidelines for pedestrians and DfT Cycle Infrastructure Design.
- v. WBC has also highlighted that the geography of the area is not favourable in terms of the promotion of trips for cyclists, with journeys to Newbury having to climb up out of the River Enborne valley and on return journeys to climb out of the River Kennett valley.
- vi. In respect of the proposed enhancements to public transport, WBC has expressed limited confidence that any extension to the new bus service would be in place in the long term; this seriously undermines the ability of the applicant to argue that the site is in a location that would deliver sustainable development.
- vii. WBC conclude that the 'location is at best marginal' with regard to sustainability. It is disappointing that BDBC does not appear to have considered the issue of sustainability in the context of the NPPF, which is a serious short-coming in its approach.

- viii. The latest revised transport proposals do not address the lack of connectivity between the established community of Woolton Hill and the development. Trips to the services and facilities to Woolton Hill, including the school, would necessitate trips by car which would be entirely inconsistent with delivering sustainable development.

7. Basingstoke and Deane Local Plan Review

8.1 BDBC is at an early stage in reviewing the current Local Plan. Whilst the weight to be attached to the material published so far will be limited in the decision-making process, it is relevant in terms of BDBC's approach to delivering additional development which is sustainable and how Policy SS4 is applied.

8.2 BDBC has considered how its emerging housing requirement should be met given the guidance in the NPPF. The emerging strategy for the provision of housing has Basingstoke as the focus of further development, with some distributed across the larger settlements in the Borough (Ref: September 2021 meeting of the Economic, Planning and Housing Committee).

8.3 The application site was submitted for inclusion in BDBC's SHELAA site review (Ref: EW008) and for consideration as a potential allocation in the new Local Plan. Following an assessment of its merits, it has not been included in the list of sites to be taken forward for further consideration to meet the emerging housing requirement (Ref: September 2021 meeting of the Economic, Planning and Housing Committee).

8.4 In respect of potential development in the rural parts of the Borough, a paper was published for the November meeting of the Committee, outlining an approach which reflected the emerging strategy of locating development in sustainable locations. *The level of growth to be considered in the rural settlements should respond to the local area retaining the individual identity and character of them.*

8.5 A Settlement Study Part 1 draft of October 2021 has been prepared, which forms part of the evidence base to BDBC's approach to development outside of Basingstoke. A key principle of the study is to direct development to the most sustainable locations. The study seeks to direct the greatest number of homes to the most sustainable settlements, and to ensure that the most sustainable settlements grow most in proportional terms (Ref: para 3.2 of the covering report to the November 2021 meeting).

8.6 Woolton Hill is included within the category of small villages which have a limited range of facilities and relatively small populations. No contribution to the emerging housing requirement has been identified for Woolton Hill.

8.7 East Woodhay Parish has made a significant contribution to the housing needs of the district. In the preparation of the new Local Plan, BDBC identified that the Parish has exceeded, by some 55 dwellings, the requirement under the current Local Plan - ref: Policy SS5 (by 55 dwellings). In addition, no further provision was proposed from East Woodhay Parish in a report on the emerging Local Plan presented to the Economic Housing and Planning Committee on the 9th June 2022.

8. Planning Policies of West Berkshire Council

9.1 The site is within BDBC area and the application will be assessed against the Development Plan for that area. However, given the relationship of the site immediately to the north and to Newbury and

the applicant's reliance on that relationship to promote the site as one where sustainable development can be delivered, it is appropriate to have regard to the policies of WBC.

9.2 The Development Plan for West Berkshire comprises: Core Strategy Development Plan Document 2006-2026; Housing Sites Allocations Development Plan Document 2017; West Berkshire District Local Plan 1991-2006 (saved policies). WBC are currently preparing the West Berkshire Local Plan Review to 2022-39. In March 2023, the review plan was submitted for examination.

9.3 The overall planning strategy in respect of Enborne Row and Wash Common as set out in the Development Plan Documents (DPDs) and the Local Plan Review, is one of development following the existing settlement pattern with a focus on settlements defined in a hierarchy. The smaller the settlement and the more limited the availability of services and facilities, the more limited the scale of development. Enborne Row is not included within the settlement hierarchy. Development would be limited to infill and rural exception sites.

9.4 It is worth noting that in successive DPDs, WBC when considering the merits of residential development to meet the future needs of the Borough, has concluded that there are better locations and sites within the Borough, which can deliver sustainable development – all better than land to the south and west of Newbury. The West Berkshire Landscape Character Assessment 2019, describes the character of the area in similar terms to that of BDBC's. The application site is located in essence within the Enborne Upper Valley Floor LCA UV4 - See pages 58-62. It describes the area as having a sparsely settled rural character with buildings limited to occasional farms and small stretches of linear development. Valued features and qualities include: important semi-natural habitats along the river corridor; the role of the river valley as a well-established boundary between Berkshire and Hampshire, its sparsely settled rural character and sense of enclosure and tranquillity.

9. Conclusion

10.1 It is clear that this application is contrary to the adopted Local Plan policies SD1, SS1, SS4, SS5, SS6 CN4, CN6, CN7, CN8, CN9, EM1, EM4, EM5, EM6, EM7, EM10, EM12.

10.2 It is also clear that this application is contrary to the East Woodhay Neighbourhood Plan policies, NE1, NE3, NE4, CF2, HO1, HO2, HO3 and TT1.

10.3 Having considered the merits of the application against the relevant planning policies, the Parish Council strongly objects to it. The harm to the rural character of the parish, its poor relationship to the existing development and facilities within it, with related reliance on the car means that if permitted, it would result in development which was not sustainable.

10.4 The Parish has exceeded the number of dwellings required by the adopted Local Plan and is not at this stage required to make provision for any additional homes under the emerging Local Plan.

10.5 The planning strategy of both the adopted and emerging Local Plans of BDBC, is to locate development in sustainable locations. It has assessed the site and concluded that the land at Common Farm is not a location where sustainable development can be delivered and has identified other sites elsewhere.

10.6 WBC have undertaken a similar process and come to the same conclusion.

Please advise the Parish Clerk should the matter be referred to the Development Control Committee, as the Parish Council may wish to appoint a Councillor to attend.