

21/03394/OUT - Land at Common Farm, Wash Water.

The Planning Committee of East Woodhay Parish Council continue to object to the above application.

Summary

The revised proposals for a total 270 dwellings, with a first phase of 82 dwellings, do not overcome the objections of East Woodhay Parish Council Planning Committee to the development by Bewley Homes as set out in its previous responses.

The Planning Committee consider that the revised application is contrary to the following policies of the made East Woodhay Neighbourhood Plan: NE1, NE4, CF2, HO2, and TT1.

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.

Introduction

The purpose of this submission is to set out the response of East Woodhay Parish Council Planning Committee to the further revised proposals submitted by Bewley Homes on 20th February 2023.

This response should be read in conjunction with its original submission of the 10th January 2022 and further submission of the 8th November 2022.

Background

Bewley Homes have submitted further revisions to the planning application 21/03394/OUT. The making of the East Woodhay Neighbourhood Plan on the 23rd February 2023 represents a significant change to the policy framework, as it forms the most up to date part of the Development Plan for the area within which the application is located.

Submission

The application is contrary to the East Woodhay Neighbourhood Plan

The East Woodhay Neighbourhood Plan was made on the 23rd February 2023 by BDBC. It 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.

Phase One is outside of the parish but is integral to the development of the site as a whole, e.g. in terms of access and provision of open space. The future phases, which contain most of the proposed development, are within the parish and are subject to the policies in the Neighbourhood Plan. It is the contention of the

Committee that this proposed large scale development within the parish would be contrary to the following policies of the Neighbourhood Plan as follows:

Policy NE1 Protecting the Landscape

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.

Policy NE4 Nature Conservation

The policy requires development to endeavour to protect and enhance existing natural features, to enhance biodiversity and to show a measurable net gain for biodiversity. The proposed mitigation appears to rely on off-site provision outside of the Borough (ref the response from Aspect Ecology 20.2.23). It is not clear if there is a net loss of biodiversity within the Parish. If this is the case the proposed development is contrary to this policy.

Policy CF2 Recreation

This policy requires new development to provide recreation opportunities which meet the standards set out in BDBC Green Infrastructure Strategy. The masterplan locates 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. The proposed development is, therefore, contrary to this policy.

Policy HO2 Settlement Policy Boundary

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

Policy TT1 The Traffic and Parking Impact of New Development

The policy sets out that development should provide safe and sustainable transport enabling a reduction in car usage. For the reasons set out below the Parish Council considers that the proposed development is in conflict with the policy.

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. The latest revisions submitted by the applicant have only sought to reinforce this view as they continue to focus on the relationship with Newbury.

The revised proposals for managing the impact of the development on the transport network, as far as West Berkshire (WBC), is concerned appear to have addressed the technical issues that it had as Highway Authority. However, from its consultation response of the 24th February 2023 it is clear that WBC continues to have serious

doubts that the site would deliver a sustainable development, despite the revised measures for pedestrians, cyclists and public transport. WBC repeats its view that there would be a low level of use by pedestrians and cyclists of the proposed links because for both types of user 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.

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 up out of the River Kennet valley.

The availability of good public transport is essential in the delivery of sustainable development. The applicant has proposed that the existing bus service number 2 is re-routed into the site. WBC advise that currently there is no capacity within the service to divert it but the issue could be reviewed as part of the 2024 bus tender process.

In the applicant's response dated 20th February 2023 to Hampshire County Council's (HCC) comments on public transport, it has committed to making a financial contribution of £1.8m to cover an eight-year period to 2032. Beyond that period the expectation is that the route would be self-sufficient. However, WBC has expressed limited confidence that any extension to the new bus service would be in place in the long term, which seriously undermines the ability of the applicant to argue that the site is in a location that would deliver sustainable development.

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.

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

In its previous responses the Committee has sought assurances that the internal road layout would be so designed as to enable easy access by buses. It is not qualified to comment on the technical matters addressed in the revised layout, but would make the point that the mobility hub and bus turning area is located within land at risk from flooding. If no land raising is proposed there must be a serious question mark over how accessible the site will be for users of the proposed bus service, if a key piece of infrastructure is at risk of flooding.

The Committee also draw attention to the intention of the applicant not to offer for adoption the internal road network, which raises a concern regarding how on-street parking would be managed in the event that it created an access issue for buses.

The application is contrary to the Basingstoke Local Plan, in conflict with the NPPF and the objective of delivering sustainable development.

The Committee has previously raised and continue to raise an objection under Policies EM6 Water Quality and Policy EM7 Managing Flood Risk. In particular, it raised the issue of no sequential test having been applied to the proposed development in accordance with the advice in the NPPF. The failure of the applicant to submit a sequential test, which is required by national guidance on flood risk, is a serious shortcoming.

The applicant's position appears to rely on the location of built development being outside of the areas most at risk of flooding. However, the developments bus turning area and mobility hub are located in areas where flooding is currently experienced and is likely to remain at risk in the future. The vehicular access serving that part of the site within the parish is also routed through an area at risk of flooding. In terms of the sequential test the site should be treated on a comprehensive basis for the purposes of applying the test.

Further, as the proposed development relies on land which currently experiences flooding and is at risk from flooding in the future to meet the recreation needs of the residents. This means that for significant periods during the year the land is likely to be unusable, thereby substantially restricting where residents could take exercise. This potential lack of useable land during the year means that the development would be deficient in terms of the Council's open space standards and would be contrary to Policy EM5 of the adopted Local Plan.

As the site is subject to risk from flooding and the limited potential, given its location, of the proposed package of transport measures, the Committee considers that the site would not deliver sustainable development and is contrary to Policy SD1 of the Local Plan.

The Committee maintains its objection in respect of flood risk and asks BDBC to request the applicant to submit a sequential test in *accordance with national guidance*.

The draft revisions to the NPPF published in December 2022 re-affirm the Government's commitment to delivering sustainable development. The Committee would highlight the following:

'The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes and other forms of development, including supporting infrastructure in a sustainable manner' (paragraph 7).

Conclusion

The application would not deliver sustainable development; it should be refused.