



08 November 2022

East Woodhay Parish Council continue to object to the above application, including recent revisions.

Summary

The revised proposals for a total 270 dwellings, with a first phase of 82 dwellings, does not overcome the objections of East Woodhay Parish Council (EWPC) to the proposed development by Bewley Homes.

Introduction

The purpose of this communication is to advise of the response of EWPC to the revised proposals in respect of the above application, submitted by Bewley Homes in October 2022.

This response should be read in conjunction with the original objection of the 10th January 2022.

Background

Bewley Homes have submitted revisions to the above application. In particular, the total number of proposed dwellings has been reduced from 350 to 270. The first phase of the developments has been reduced 90 to 82 dwellings, with revisions made to the layout. Other key elements remain the same; a 1600sqm community building, 1200sqm health and well-being centre and a 250sqm convenience store.

As previously stated, EWPC set out its objections to the application in its submission of the 10th January 2022; a summary of which is set out below:

‘The proposed development is contrary to the Basingstoke Local Plan 2016 for reasons set out in this submission. It is in conflict with the NPPF and the objective of delivering sustainable development. The proposed development conflicts with the Hampshire Minerals and Waste Plan. It is also contrary to the emerging Basingstoke Local Plan.

The proposed development is contrary to the emerging East Woodhay Neighbourhood Plan. It aims to maintain the rural character of the parish by ensuring development is appropriate in scale and design. The proposed development is of a scale which would have a significant adverse impact on the character of the parish for which there is no need.’

Objections were made in respect of the relevant policies in both documents.

This further submission is set out using the key elements of the summary above.

Submission

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

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, if any, contribution to the community life of the parish. The further submissions by the applicant have only sought to re-inforce this view, as they continue to focus on the relationship with Newbury.

The two Highway Authorities consulted, Hampshire County Council (HCC) and West Berkshire Council (WBC) have raised concerns regarding the location in terms of achieving sustainable development. WBC has advised that the walking distances to services and facilities is at the upper end of the range considered acceptable and the routes for cyclists are not great. At best the location is considered marginal in terms of sustainability.

HCC has advised that the provision of bus services is fundamental in ensuring the proposed site is fully accessible by public transport. Further, the proposed improvements for several pedestrian/cycle connections from the site to the surrounding network are considered essential to improve the sustainability of the proposals. Notwithstanding this, the development is not considered to be in a particularly sustainable location and many local facilities are on the upper limit of recommended walking distances.

The applicant has submitted a Highways and Transport Position Statement. It would appear that it has agreed a public transport contribution with WBC to be used to provide an 8 year service in and around the site, with an expectation that it would be self-sufficient. It would run on a 30/60minute frequency circa 06300-1800 Monday to Saturday. The value of the contribution has been agreed with WBC, which would suggest that the service would only link the site to Newbury with no provision for services to locations within Basingstoke and Deane district. The proposals have yet to be agreed with HCC as the Highway Authority at the time the Statement was submitted.

No detail is given as to at what point in the development the service would commence. There is uncertainty regarding the start and finish of the service during the days on which it would operate and, at best, there is an 'expectation that the service would be self-sufficient after eight years'.

The proposed bus service to/from Newbury would enter and exit the site from the Andover Road. In terms of the operation of this service and any other, such as that from Andover to Newbury, EWPC want to be assured that the internal road layout would facilitate its use by buses. Experience elsewhere suggests that on-street parking by residents is a significant issue and could result in an adverse impact on the proposed services.

To support the proposed public transport contribution evidence of a similar approach and how effective it has been in reducing use of the car should be provided by the applicant. EWPC, in the absence of the detail of the proposed public transport service and the uncertainty regarding its long-term future, maintains the position and objection that the site is not in a sustainable location.

The Statement also includes a commitment by the applicant to provide a pedestrian/cycle link on the A343 Andover Road to Warren Road. This proposal would not link the site to the existing strategic off-road pedestrian/cycleway on Monks Lane and the lack of a continuous route to Monks Lane would act as a deterrent for trips to the town centre.

It is EWPC's view that the proposed link would not overcome the inherent unattractiveness of routes to Newbury Town Centre and other key destinations for pedestrians and cyclists.

The applicant is prepared to provide a school travel plan contribution of £42k. The sum would be used to promote non-car trips to schools serving the development including, St Thomas Infant School, Woolton Hill Junior School and Burghclere Secondary School.

Based on its understanding of current travel patterns, EWPC considers that the modest sum proposed and the distances to the schools which would serve the site, would mean that the contribution would have a limited impact in terms of achieving non-car trips to the schools.

The overall package outlined in the Statement provides insufficient detail of the transport proposals to conclude that they would have a fundamental impact in terms of modal shift. There is uncertainty as to the frequency of the proposed bus service and its long-term future. The development would not deliver a complete off-road pedestrian/cycle link to the existing network in Newbury. The School Transport Plan contribution is very modest. Given that Highway Authority consultees view that the site is marginal, at best, in terms of it being a sustainable location one would have expected a more comprehensive package of measures to promote alternatives to the car.

It should be noted that WBC in its response of the 28th October 2022 has maintained objections to the revised proposals and has again stated that the location is not sustainable.

In summary EWPC do not consider that the current proposals would deliver a sustainable development in transport terms and result in a significant change in travel patterns.

EWPC raised an objection under Policies EM6 Water Quality and 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 contained in the NPPF. That remains the case in respect of the revised proposals.

The ground conditions of the site present specific challenges to the proposed development in addition to the potential risk from ground water flooding. In its response of 5th July 2022 the Environment Agency set out a number of conditions to address issues of land contamination, protect water quality in the River Enborne and to protect the groundwater resources. 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.

EWPC is aware of the submission made by ERVPS of the 12th October 2022 in response to BDBC's Planning Policy Team's consultation of the 13th September 2022 which advised that the sequential test had been satisfied. EWPC is in agreement with the points raised by ERVPS that the NPPF requires a sequential test and that it should consider the availability of alternative sites. The approach taken by the planning policy team is inconsistent with the advice in the NPPF. To date the requirement for a sequential test has not been met and this is considered to be a serious omission in the consideration of the application.

EWPC maintains its objection in respect of flood risk and water quality and asks BDBC to request the applicant to submit a sequential test in accordance with national guidance. EWPC maintains its original objection in respect of the other policies to the revised application.

The application is contrary to the emerging East Woodhay Neighbourhood Plan.

Half of the site lies within the parish of East Woodhay. A Neighbourhood Plan has been prepared and has recently been the subject of an external examination. The Examiner has published her report and has recommended that, subject to some minor modifications, it proceeds to referendum. An as yet unspecified date in January has been suggested by BDBC; but for the purposes of decision making it is a material consideration **which carries considerable weight**.

EWPC consider that the proposed development is contrary to a number of policies in the Neighbourhood Plan including:

NE1 Protecting the Landscape,

Policy NE3 Dark Skies,
Policy NE4 Nature Conservation,
Policy NE5 Trees and Hedgerows,
Policy HO1 Good Quality Design,
Policy HO2 Settlement Policy Boundary,
Policy HO3 Housing Provision for Older People, and
Policy H4 Housing Mix.

As the Neighbourhood Plan has reached an advanced stage in the process and has satisfied the Examiner that it should go forward to a referendum as soon as possible, public 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 Neighbourhood Plan.

The development is of a scale which would have an adverse impact on the character of the parish for which there is no need.

The applicant has set out in its Design Response October 2022 why it considers that the reduction in the total number of homes from 350 to 270 would result in a form and scale of development in line with the existing pattern of development. The Design Response only refers to the location of the site to development to the north ie: Enborne Row, Washwater and Newbury. This is further illustration of its poor relationship with the settlements to the south and to Basingstoke & Deane, the borough whose housing needs it is claimed to be meeting.

The proposals would introduce a scale and form of urban development not found within the Highclere and Burghclere landscape character area. It would have no association with the existing settlement of Woolton Hill in terms of density, scale, 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'. The Design Response does not satisfactorily address the impact of the proposed development.

EWPC remains of the view that the reduction in the number of dwelling does not result in a development which respects and has due regard to the density scale layout and appearance of the surrounding area.

EWPC maintains its objection in respect of the impact of the development on the character of the area ref: Policy EM1 and Policy EM10 of the local plan.

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 and its earlier submission and, therefore, would not satisfy the NPPF objective of delivering sustainable development.

Setting aside that position the contribution to the current supply (as at 1st April 2021) would at best be 82 dwellings (less than 2% of the five year supply) for five year period 2021/22-2025/26 assuming that permission was granted in the near future for the full application. It is unlikely that many of the remaining dwellings proposed in the outline application would be delivered in the same period.

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 what was required under the current Local Plan ref: Policy SS5 (by 55 dwellings). Further, no provision was proposed in a report on the emerging Local Plan presented to the Economic Housing and Planning Committee on the 9th June 2022.

In terms of a local need for housing there is none.

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.