

Response from:

The Planning Committee of
East Woodhay Parish Council

to the

Proposed Development at Common Farm by Bewley Homes

Ref: 21/03394/OUT

10th January 2022

Summary

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

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.

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 key Local Plan policies are:

- Not sustainable development ref Policy SD1, CN9
- The scale of the development proposed out of character with the established settlement pattern of the area ref Policy SS1 EM10
- Limited contribution to housing land supply ref Policy SS4
- Contrary to the East Woodhay Neighbourhood Plan ref Policy SS5
- Development in the countryside ref Policy SS6
- Meeting affordable housing needs ref PolicyCN1
- Housing mix for market housing Policy CN3
- Location for housing for the elderly ref Policy CN4
- Poor relationship with existing facilities ref Policy CN7
- Generates trips by car, lack of alternative forms of transport ref Policy CN9
- Impact on the local landscape ref Policy EM1
- Impact on the River Enborne and its setting ref Policies EM4, EM5,
- Impact on water quality ref Policy EM6
- Development at risk from flooding ref EM7
- Impact on settlement character ref Policy EM10
- Pollution Policy EM12
- and
- Policy 15 of the Hampshire Minerals and Waste 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. The key policies are:

- Policy 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 and Building in the Countryside
- Policy HO3 Housing Provision for Older People
- Policy TT1 The Traffic and Parking Impact of New Development

1.Introduction.

1.1 The purpose of this submission is to set out the response of the Planning Committee of East Woodhay Parish Council to the proposed development by Bewley Homes for 350 homes on land at Common Farm. (Ref application 21/03394/OUT.) This response sets out objections to the principle of development at Common Farm. Where appropriate specific comments have been made in respect of the two components of the application: that is the Outline Application for 350 dwellings and the Full Application for 90 dwellings.

1.2 The Parish Council may submit further representations in response to those of the consultees contacted by BDBC and further evidence provided by the applicant.

1.3 The application site is within Hampshire but adjoins 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, Wash Common and Newbury and the reliance of the applicant on the proximity of services and facilities to the north of the site.

2.The Proposal.

2.1 Bewley Homes have submitted proposals for development at Common Farm in the form of a hybrid application for a mixed-use community, comprising:

a) an outline planning application for up to 350 dwellings (Use Class C3) including dwellings for older people; a 1,600 square metre community building (Use Class F2(b)); a 1,200 square metre Health and Wellbeing Centre (Use Class E(e)) and a 250 square metre convenience store (Use Class F2(a)); demolition of Common Farm and associated agricultural buildings; the provision of open space, allotments, community gardens, a riverside park/nature trail, drainage attenuation, landscaping and associated infrastructure; and

b) a full planning application for the first phase of residential development including 90 dwellings (Use Class C3), public open space, associated landscaping and infrastructure works. Full planning approval is also sought for access arrangements including a new vehicular access onto the Andover Road (A343).

(Source: RPS Planning Statement November 2021)

3. Planning Context.

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

3.2 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. This is illustrated by the documentation submitted in support of the application which has, as its focus, the relationship of the site to Newbury.

3.3 The application is submitted having regard to the lack of a five-year supply of housing land within Basingstoke and Deane Borough, as at April 2021. 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 and in particular, access to services and facilities, in seeking to justify it being sustainable development.

3.4 This submission will focus on the planning policies of Basingstoke and Deane Borough Council (BDBC) but will also refer to the relevant policies of West Berkshire Council (WBC).

The Development Plan

3.5 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.)

3.6 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. Where there are relevant local Development Plan policies, or they are out of date, paragraph 11d of the NPPF should be referenced, as this is relevant to the parish. This section highlights the importance of the protected area of the AONB in development decision making when Local Plans are not available.

3.7 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 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 are not relevant.

4. The Local Plan Framework

Basingstoke and Deane Local Plan 2016

4.1 The Plan includes a number of policies which are pertinent to the consideration of the merits of the land at Common Farm for development and are set out below.

Policy SD 1 Sustainable Development

4.2 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 in respect of the conflict with policies of the Local Plan, it is considered that the proposals do not deliver sustainable development.

4.3 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 which generated the need for housing. Residents of the Borough for whom the housing is intended, are most likely to have strong connections with the towns and villages some distance away from the site, which 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 economy.

Specific comments on the Outline Application are:

4.4 The transport assessment submitted by the applicant's consultants includes projected trips to a range of destinations. Table 6.16 shows that the majority of trips residents of the site will generate, will be to destinations other than Basingstoke, which emphasises its poor relationship with the Borough. The destinations are some distance away, with the majority of these journeys forecast to be made by car which would be contrary to the purpose of planning to deliver sustainable development.

4.5 East Woodhay parish is a very rural one with limited facilities available to residents of the proposed development. Those that it does have, at Woolton Hill, are not easily accessed on foot or by cycle from the site

and the routes are via unlit rural roads with no continuous footways. There is a very limited public transport linking the site to Woolton Hill.

Specific comments on the Full Application are:

4.6 The proposal for 90 dwellings would result in a development without any community of social services and facilities. It is yet to be established, what if any, improvements to existing bus services would be provided or that the suggested pedestrian/cycle route north along the Andover Road would be delivered as part of the first phase of the development. The lack of any facilities would mean that none of the daily needs of residents would be met on site necessitating journeys to locations off-site.

The Outline Application would be contrary to Policy SD1.

The Full Application for Phase One would be contrary to Policy SD1.

Policy SS1 Scale and Distribution of New Housing

4.7 The policy sets the overall strategy for the provision of new housing in the Borough. The proposal is outside of any defined settlement policy boundaries (Ref criterion a); is not an allocated site (Ref criterion d); and is not an exception site (Ref criterion f).

The Outline Application would be contrary to Policy SS1

The Full Application would be contrary to Policy SS1

Policy SS4 Ensuring a supply of Deliverable Sites

4.8 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 that 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.

4.9 The application site is not an allocated site under Policy SS4 and its location adjoining the River Enborne could have an impact on the water course. It is being proposed outside of a review of the Local Plan and is therefore contrary to the policy.

The Outline Application is contrary to Policy SS4

The Full Application is contrary to Policy SS4

Housing Land Supply

4.10 The current supply as at April 2021 is 4.5 years, a shortfall of 569 dwellings over the five-year period (Ref: BDBC AMR 2021). The application seeks to address the current shortfall in housing land supply within BDBC. The addition to the current supply of housing is promoted as an important benefit. The application is contrary to the adopted Local Plan and a number of specific policies. In undertaking the weighing of the adverse impacts of the proposal against the benefits there is merit in considering the scale of the benefit in terms of the increase in the supply of housing arising, if permission was granted.

4.11 No information has been submitted in respect of the 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. 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 eg. technical consents from other agencies, market forces;

Specific comments on the Outline Application are:

4.12 The planning application was registered in November 2021. Based on Lichfields studies, it is reasonable to assume that the earliest that the first completions would be delivered would be towards the end of 2026. On that basis, the site would not make a contribution to the current shortfall.

Specific comments on the Full Application are:

4.13 The full application for 90 dwellings, if permitted, could achieve an earlier start on site and deliver the first completions sooner. Assuming a planning permission was achieved by the end 2022, it is possible that the site could deliver its first completions within two years i.e. at the end of 2024/25. Applying the rate of 27dpa the site could potentially deliver that number as a contribution to the five-year land supply, compared with a current shortfall of 569 dwellings.

Policy SS5 Neighbourhood Planning

4.14 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. Woolton Hill in East Woodhay Parish was required to provide 10 dwellings – some 65 dwellings have been achieved exceeding the Local Plan requirement.

4.15 BDBC as part of the review of the adopted Local Plan have published a report, see para 4.67 below. It has established an initial position and East Woodhay parish has not been allocated a figure.

The Outline Application is contrary to Policy SS5

The Full Application is contrary to Policy SS5

Policy SS6 New Housing in the Countryside

4.16 The policy seeks to restrict development outside of the settlement policy boundaries defined in the Local Plan. The proposal does not meet:

- criterion a) as it does not comprise development appropriate to the site's context,
- criterion b) is not a rural exception site for affordable housing,
- criterion c) does not lead to the enhancement of the immediate setting,
- criterion e) is not a small-scale development or
- criterion g) is not allocated for development in a neighbourhood plan.

The Outline Application is contrary to Policy SS6

The Full Application is contrary to Policy SS6

Policy CN1 Affordable Housing

4.17 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. It is understood from information provided by BDBC (Ref: the Section 106 Scoping Proforma) that the housing need for East Woodhay and Highclere parishes is 23. 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. 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. 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.

4.18 The application for 90 includes provision for 54 affordable homes which would exceed the identified need; it is assumed at least half would be offered to those in housing need from outside of the two parishes.

The Outline Application is contrary to Policy CN1

The Full Application is contrary to Policy CN1

Policy CN3 Housing Mix for Market Housing

4.19 The policy seeks to deliver housing which:

- a) addresses local requirements,
- b) is appropriate to the size, location and characteristics of the site,
- c) is appropriate to the established character and density of the neighbourhood and
- d) provides 155 accessible homes.

4.20 The existing development within the parish is of a relatively low density. The proposed development would be of a considerably higher density, more associated with an urban area and out of character with this rural location.

Specific comment on the Full Application:

4.21 The proposed mix of housing for the first phase is set out in the Planning Statement ref para 4.26. No justification is presented for the proposed mix and how it meets the requirements of the policy.

The Full Application is contrary to Policy CN3

Policy CN4 Housing for Older People/Specialist Housing

4.22 The policy supports the provision of housing specifically designed to meet the needs of older people or specialist accommodation. However, that is subject to i) meeting a proven need ref criterion i) and ii) that the location is appropriate in terms of access to facilities services and public transport. The outline application includes provision for older persons but no details are provided as to what that would comprise. The Design and Access Statement includes an illustration (page 3), which identifies a site for older people's housing (site 10) In the context of the comments made in respect of Policy CN7 and Policy CN9 below it is considered that the proposals are contrary to the policy.

The Outline Application is contrary to Policy CN4

Policy CN6 Infrastructure

4.23 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.

4.24 It is assumed that in the event that permission was granted a Section 106 agreement would be required to ensure the delivery of all of the infrastructure proposed by the applicant. Until such times as that agreement is in place, there is no certainty that it will be provided. It is also unclear as to what infrastructure the full application for 90 dwellings would provide. For it to be considered a sustainable development any Section 106 should, as a minimum, deliver improvements to the existing public transport services and the footpath/cycleway on the Andover Road to provide genuine alternatives to the private car and the convenience store to meet the daily shopping needs of the new residents. This negotiation will need to take place between Hampshire and West Berkshire Councils, as well as BDBC, which will significantly impact the timescales and start times for any development.

4.25 It is also assumed that the Full Application would not provide all of the infrastructure package being offered.

The Outline Application is contrary to Policy CN6

The Full Application is contrary to Policy CN6

Policy CN7 Essential Facilities and Services

4.26 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.

4.27 The development is poorly related to existing provision in East Woodhay and Highclere parishes. The facilities proposed are not adjacent to an existing settlement within the Borough. No evidence has been submitted to demonstrate there is a need for the facilities being provided. Similarly, no evidence of need has been submitted in respect of Enborne Row and Wash Water.

4.28 The development is poorly related to the limited services and facilities available in the parish which residents of the proposed development could access realistically only by car. Were the new facilities proposed in the outline application to be provided, existing residents of the parish would need travel to them by car. The proposed provision of a community building is a concern to the Parish Council as it could attract existing and potential users of the existing community buildings to it, resulting in a reduction in income.

4.29 The site is within the catchment 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 and would be taken by car. The secondary school for the area is The Clere School at Burghclere - approximately 3 miles away. Again journeys to that school would need to be either by car or possibly a school bus. It is not known if the schools have the capacity to provide the necessary places required by the development or if there is capacity in the schools within Newbury.

Specific comments on the Outline Application are:

4.30 The application does not set out how the proposed health and well-being centre would be delivered or how it would relate to existing health facilities. The Parish Council is aware of examples elsewhere in Hampshire where new health facilities have been included as part of outline applications, but have not been delivered. There is also a national shortage of GPs as the Parish Council understands the position. In that context, without certainty that the facility will be provided and not at the expense of an existing facility, any benefit arising from it should be disregarded.

4.31 The proposal for a first phase of 90 dwellings would be totally reliant on existing facilities.

The Outline Application would be contrary to Policy CN7

The Full Application would be contrary to Policy CN7

Policy CN8 Community, Leisure and Cultural Facilities

4.32 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,
- e)-f) focus on the potential loss of existing facilities.

4.33 The proposals include a number of community and leisure facilities. They are proposed in order to support the contention that the 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 eg. would the new community hall attract users of existing facilities such that there would be a negative impact on income resulting in their loss?

4.34 There is no indication at this stage 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 and routes, which would be unattractive to pedestrians and difficult, given the limited availability of public transport.

4.35 In respect of the Full Application there are no proposals to provide any facilities.

The Outline Application is contrary to Policy CN8

The Full Application is contrary to Policy CN8

Policy CN9 Transport

4.36 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.

4.37 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, including the secondary school in whose catchment the site is located, is approximately 3 miles away. The routes to both villages have no continuous footway links and no lighting and is not suitable for pedestrians and children. There is a limited bus service. It is most likely that almost all journeys would be by car.

4.38 The measures proposed to support 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.

4.39 At present there is no certainty that an improved bus service - such that it would provide a reasonable alternative to the car - would be delivered and no certainty that the proposed off-road shared route, on the east side of Andover Road, would be provided.

4.40 In the context of the above, it is considered that most trips would be by car. In respect of the objective of seeking to deliver sustainable development within the Borough, the proposals in transport terms, will not achieve that.

Specific comments on the Full Application are:

4.41 In respect of the Full Application, in the absence of the measures proposed by the Outline Application, the potential for non-car based trips is even less, resulting in a car-based development, poorly related to the existing settlements within the Borough.

The Outline Application would be contrary to Policy CN9

The Full Application would be contrary to Policy CN9

Policy EM1 Landscape

4.42 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. Developments which do not maintain the integrity of existing settlements will not be considered acceptable.

4.43 The site adjoins the North Wessex Downs AONB and contributes to its setting. Travelling 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 woodland south of the A34, The Chase, from the public right of way which crosses the site which is in the AONB. The site can be viewed from Great Penwood (Forestry Commission owned) which is within the AONB.

4.44 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. 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.

4.45 The Enborne is the only river in the parish and is an important feature on its northern boundary.

4.46 BDBC commissioned a new Landscape Character Assessment 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 eg 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).

4.47 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 that

potential road lighting schemes should be assessed for their visual impact to encourage the conservation of the existing dark skies on the skyline.

4.48 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 applicant's 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'.

4.49 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 revised 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 ie Wash Common when travelling on the A343 Andover Road, before entering another ie Woolton Hill. Development at Common Farm would significantly erode that perception and appreciation of separation.

The Outline Application would be contrary to Policy EM1

The Full Application would be contrary to Policy EM1

Policy EM4 Biodiversity, Geodiversity, Nature Conservation

4.50 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.

4.51 The site is of ecological value, in particular having regard to its 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). It is proposed that none of the hedgerows to be removed are likely to qualify as important under the Hedgerow Regulations (Ref para 4.10.6). However, until the status of those to be removed is established, it cannot be assumed that there would be no loss of Priority Habitat. The long-term future of the remaining hedgerows located in a large development is also uncertain.

The Outline Application would be contrary to Policy EM4

The Full Application would be contrary to Policy EM4

Policy EM5 Green Infrastructure

4.52 The policy will only permit development which does not result in fragmentation of the green infrastructure network by severing important corridors/links.

4.53 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. 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 the wildlife – these will be impacted by the development. (Ref: criterion b)

The Outline Application would be contrary to Policy EM5

The Full Application would be contrary to Policy EM5

Policy EM6 Water Quality

4.54 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. (Ref: para 4.8 above). 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.

4.55 The location of development close to the River Enborne will increase the risk of pollution to it.

The Outline Application would be contrary to Policy EM6

The Full Application would be contrary to Policy EM6

Policy EM7 Managing Flood Risk

4.56 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.

4.57 A detailed report regarding the role of the land at Common Farm and its contribution to the catchment of the River Enborne has been submitted to BDBC by a local resident with expert knowledge (Ref: letter dated 3rd December 2021 from Mr. Garrett, published on BDBC web site, 14th December 2021). The submission highlights the sensitivity of the functioning of the catchment to changes in the hydrology and the potential impact of the proposed development at Common Farm. It concludes that the works proposed, including the foundations for buildings, pipework and attenuation ponds, would have significant adverse impact on the way in which the hydrology of the land functions; increasing the risk of flooding to adjoining residential properties and those proposed. The loss of the farmland vegetation, to be replaced by hard surfaces, in combination with the below ground changes, will increase the flow of water into the River Enborne, which could have consequences for land downstream. The proposed development would also have a significant adverse impact on the water storage capacity of the catchment of the River Enborne.

4.58 The Parish Council asks BDBC to seek expert advice on the submission made by Mr. Garrett, as it raises a number of important issues.

4.59 In the context of the application site being located in an area at risk of flooding the sequential approach as set out in the NPPF should be applied. This does not appear to have been the case.

The Outline Application would be contrary to Policy EM7

The Full Application would be contrary to Policy EM7

EM 10 High Quality Development

4.60 The policy requires development to be of a high quality and to: 2) respect the local environment and amenities of neighbouring properties 2a) positively contribute to local distinctiveness 2c) have due regard to the density, scale, layout appearance.... of the surrounding area.

4.61 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

The Full Application would be contrary to Policy EM10

Policy EM12 Pollution

4.62 The policy permits development provided that it does not result in pollution which is detrimental to the quality of life. The supporting text highlights noise, air quality, contaminated land and light pollution.

4.63 There is an issue of air quality within Newbury, on the roads providing access to the town centre. The increase in vehicular traffic from the proposed development is likely to add to the existing problems.

4.64 The applicant's LVIA October 2021 describes the night time character of the site and its surroundings as 'predominantly dark' with some light from a number of sources. On completion, when the lighting proposed for the development is operational, the LVIA suggests the magnitude of change predicted to be medium with an overall moderate adverse impact.

4.65 The dark sky of the parish is a highly valued feature 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. The introduction of a large development which would be lit to current standards would have a detrimental impact on the character of the area. (The emerging East Woodhay Neighbourhood Plan also references the AONB guidance document on lighting which should be followed.)

Basingstoke and Deane Local Plan Review

4.66 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.

4.67 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 housing distributed across the larger settlements in the Borough. (Ref: September meeting of the Economic, Planning and Housing Committee.)

4.68 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 meeting of the Economic, Planning and Housing Committee.)

4.69 In respect of the potential development in the rural parts of the Borough, a paper was published for the November meeting of the Committee, which outlined 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.

4.70 A Settlement Study Part 1 draft 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.)

4.71 Woolton Hill is included within the category of small villages (Ref Updated Settlement Policy 2021), which have a limited range of facilities and relatively small populations. No contribution to the emerging housing requirement has been identified for Woolton Hill.

East Woodhay Neighbourhood Plan

4.72 The Neighbourhood Plan for the parish is currently being prepared. There has been extensive engagement and consultation with residents. A Regulation 14 draft has been published and the public consultation period closed. A Regulation 16 version is to be submitted to BDBC shortly. The residents have highlighted the importance of maintaining the rural character of the parish by ensuring all development is appropriate in density, scale and design. The protection of the natural environment and biodiversity is also an important issue.

4.73 In terms of the policies in the Regulation 16 version to be submitted to BDBC the proposed development is considered to be contrary to the emerging **N**eighbourhood **P**lan policies:

- Policy 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 and Building in the Countryside
- Policy HO3 Housing Provision for Older People
- Policy TT1 The Traffic and Parking Impact of New Development

Hampshire Minerals and Waste Local Plan

4.74 The site is within a mineral safeguarding area for river terrace deposits, as identified on the Hampshire Minerals and Waste Plan Policies Map. Policy 15 Safeguarding **M**ineral **R**esources sets out to safeguard the Counties sand and gravel, silica sand and brick-making clay resources from needless sterilisation by development, unless prior extraction takes place. Development may be permitted without prior extraction if a number of criteria are met:

- a) it can be demonstrated that the sterilisation of mineral resources will not occur; or
- b) it would be inappropriate to extract mineral resources at that location, with regards to the other policies in the Plan; or
- c) the development would not pose a serious hindrance to mineral development in the vicinity; or
- d) the merits of the development outweigh the safeguarding of the mineral.

4.75 In respect of the policy no evidence has been submitted to justify a departure having regard to the four criteria.

The Outline Application would be contrary to Policy 15 of the Hampshire Minerals and Waste Plan
The Full Application would be contrary to Policy 15 of the Hampshire Minerals and Waste Plan

West Berkshire Local Plan

5. Planning Policies of West Berkshire Council

5.1 The site is within BDBC area and the application will be assessed against the Development Plan for the area. However, given the relationship of the site to the development 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.

5.2 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 2037. A Regulation 18 consultation was published and consulted on December 2020-February 2021. In August 2021 WBC announced it was delaying progress on the next stage whilst it considered the impact of the NPPF 2021.

5.3 In respect of housing land supply WBC can demonstrate a five-year supply.

5.4 The overall planning strategy in respect of Enborne Row and Wash Common as set out in the Development Plan Documents (DPDs) and the now withdrawn 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. In the West Berkshire Core Strategy 2012, Enborne Row was not included within the settlement hierarchy. Development would be limited to infill and rural exception sites. (Ref: Area Delivery Plan Policy 1.)

5.5 A settlement boundary for Enborne Row was included in the Housing Site Allocations DPD 2017 with a presumption in favour of development and redevelopment within the settlement boundary. The presumption against new residential development outside of settlement boundaries was re-affirmed. (Ref: Policy C1.)

5.6 This approach was carried forward into the Local Plan Review 2020 regarding the overall strategy, (Ref SP1) the role of the settlement hierarchy in the distribution of development (Ref: Policy SP3).

5.7 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, better than land to the south and west of Newbury.

5.8 In the context of the strategic planning policies of WBC, it is considered that both the Outline Application and Full Application are in conflict with them.

5.9 The impact of development on the landscape and settlement character is a key issue addressed by the adopted and emerging planning policies which apply to Enborne Row and Wash Common (Ref: Policy C19 of the Core Strategy and Policies SP7 and SP8 of the Local Plan Review). The impact on biodiversity, flood risk and Green Infrastructure is also to be addressed when considering proposals for development.

5.10 In assessing the merits of development for inclusion in its DPDs, WBC's decision-making process would have been informed by the landscape character assessments it has commissioned. The most recent one is The West Berkshire Landscape Character Assessment 2019. The application site is located in essence within the Enborne Upper Valley Floor LCA UV4. (See pages 58-62.)

5.11 In terms of development, the LCA describes the area as having a sparsely settled rural character with buildings limited to occasional farms and small stretches of linear development. The linear development has, in some locations, created a localised suburban character, which is considered to be a detracting feature.

5.12 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.

5.13 The LCA sets out a landscape strategy for the area which includes: protecting and enhancing semi-natural habitats and maintain/create linkages between fragmented areas of semi-natural habitat, to improve ecological

resilience, and conserve the rural character of the landscape by avoiding urbanising features and retaining the overall unsettled character of the valley.

5.14 In the context of the landscape and design policies of WBC, informed by the most recent LCA, it is considered that both the Outline Application and Full Application are in conflict with them.

6. Summary

6.1 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.

6.2 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. 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 sites elsewhere. 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.