

24 January 2022

FAO Jemma Cox
Planning Department
Basingstoke and Deane Council
Civic Offices
London Road
Basingstoke
RG21 4AH

Dear Miss Cox

Re: 21/03598/OUT – Land at Bishops Green Farm, Ecchinswell Road, Bishops Green, Hampshire.

Description: Outline application with all matters reserved except access for: up to 350 dwellings, up to 0.5 ha of land for community use; detailed means of access from Ecchinswell Road; landscaping; public open space; service infrastructure and associated works

ET Planning has been instructed by Ecchinswell, Sydmonton & Bishops Green Parish Council to provide their formal response to the above application; outlining the material planning considerations that should be taken into account in its assessment.

Please accept this letter as a formal **OBJECTION** comment in relation to the above Outline Planning Application. I would be grateful if you could confirm receipt, and ask that all matters raised are considered in detail and without prejudice.

Background & Principle

The application site is situated beyond any settlement boundary, defined as being within the open countryside; whereby new market housing is resisted in-line Local Plan Policy SS6, which states:

"Development proposals for new housing outside of Settlement Policy Boundaries will only be permitted where they are:

- a) On 'previously developed land', provided that:
 - i) They do not result in an isolated form of development; **and***
 - ii) The site is not of high environmental value; **and***
 - iii) The proposed use and scale of development is appropriate to the site's context."**

The proposal clearly conflicts with criteria i) and iii) as the site is not previously developed land, nor is the scale of development appropriate to the site's context. Whether or not the site is of 'high environmental value' is up for debate, but for a proposal to be considered acceptable in principle all three of the above criteria must be accorded with – which is not the case.

The application site was submitted to the Call for Sites process in April 2020, and as part of the Reg 18 consultation, for a 400-500 capacity housing site. The Council's assessment of the site concluded that development of the site would conflict with the Development Plan and be unsuitable; stating it would be unacceptable in principle, and of too large a scale.

The adopted Local Plan and Council's Settlement Study 2020 state that the Bishops Green area is unsuitable to sustain any new housing development. Bishops Green is classed as a 'Category 5 settlement – Small Village'. Settlements of this size are only suitable to 'potentially accommodate some limited growth', mainly to meet local needs and maintain the vitality of the village. Within the draft Local Plan Update, the area is proposed to accommodate a modest 15no new homes. Provision of 350 new homes is therefore substantially more than has been assessed to be suitable within this area, nearly 25x more, and all in the same location; which is not considered to be a sustainable or appropriate level of development for its context.

A Neighbourhood Plan is currently in development for the Echinswell, Sydmonton & Bishops Green Parish, which reflects the Local Plan Update, and proposes to accommodate the 15no new homes in small sites across the area. Approval of this application would undermine the entire Neighbourhood Plan and local community involvement; not to mention conflicting with the statutory Development Plan as a whole.

The proposal is therefore wholly unacceptable in principle. There are not considered to be material considerations which would be significant enough to outweigh the principle conflict with the Development Plan, or outweigh the deemed significant harm the development would cause to the character of the rural area etc.

It is noted the Council's lack of five year housing land supply, and the applicant therefore bases their principle argument of applying the 'tilted

balance' argument in favour of sustainable development; as set out within the NPPF. However, this doesn't apply to developments when there would be a clear impact/reason for refusing the development on the grounds of affecting areas or assets of particular importance. These areas/assets include protected habitats, SSSIs, and areas at risk from flooding; all of which are present within or immediately around the application site and would be affected. The tilted balance argument is therefore de minimis.

Scale & Character

The existing settlement of Bishops Green, in which the proposed housing development would adjoin, comprises a small village of approximately 250 homes; predominantly lower density housing originally built for the armed forces and in association with the nearby airbase (no longer in existence). Increasing the size of the village from 250 to 600 homes is substantial; representing a 140% increase. In addition, the increase in built form, residents, activity and traffic would significantly change the feel and character of the small village.

The site is open countryside; comprising rural and agricultural fields, and sections of woodland. The surrounding area is similarly rural, with minimal and sparse residential or other development apparent. A large business park is approximately 700m to the north of the centre of the site as the crow flies, and further notable built form 400m to the east. Development of the site would not only result in a loss of a large part of the countryside, but this section of countryside provides an invaluable buffer to Bishops Green and gap between the existing larger areas of built form. Thus, the development would cause a damaging level of coalescence between these distinctive and separate built areas; materially changing the rural character of the area to that of (sub)urban development and sprawl.

The proposal is therefore considered to be of unacceptable and extremely excessive scale for the context of the area and Bishops Green settlement; at odds with its character and appearance. Furthermore, the impact on the countryside would be substantial. Thus, the scheme is contrary to Local Plan Policies SS1, SS6, EM1 and EM10.

Highways, Access & Sustainability

There is a lack of infrastructure within the area to support such an increase in residents. Presently, there are no schools or doctors within Bishops

Green, and the village's amenities are limited to a very small convenience store and village hall. Key facilities are some distance away, which will result in the development being reliant on private car use. The nearest of these are as follows:

- Primary School: >3.5km
- Secondary School: >4km
- Medium/Large Supermarket: >4km
- Doctors: >5km
- Leisure Centre/Gym: >5km

Given the lack of crucial facilities within the immediate area, it is obvious that a significant number of car journeys will be required in order to access further afield amenities such as schools, supermarkets, places of work, leisure facilities etc; which are not realistically accommodated by the limited single bus route. Many of these facilities, such as schools and doctors, are already at capacity. The site is therefore not considered to be in a sustainable location. The development would also be heavily reliant on the facilities and infrastructure of West Berkshire, which hasn't been taken into account.

Local Plan Policy CN6 relates to infrastructure and required new development to:

"provide and contribute towards the provision of additional services, facilities and infrastructure at a rate, scale and pace to meet the needs and requirements that are expected to arise from that development.."

"Therefore, development proposals will be permitted where it can be clearly demonstrated that infrastructure can be provided and phased to support the requirements of proposed development."

The existing area and its infrastructure cannot accommodate this level of additional homes, and the application does not propose any notable infrastructure that is required, such as a school, doctors, leisure centre, bus service etc. Thus, the proposal does not comply with Policy CN6.

Looking at climate change implications, the isolated location of the site and reliance on car would have severe negative impacts. Further, the scheme put forward does not commit to measures which would be contribute to carbon neutral housing e.g. EV charging points aren't proposed for every house, PV panels aren't incorporated into design, and there is no commitment to heat pumps or insulation. Ensuring construction that 'can

accommodate' these measures, 'be flexible' or be 'retrofitted in the future' are not sufficiently strong in terms of sustainable design or addressing climate change.

Existing traffic conditions were not assessed as part of the Transport Surveys and submitted Report. The reason given is due to considering the conditions 'not normal owing to the covid-19 pandemic'. Therefore, the actual situation with regards to traffic movements and congestion has not been established, and subsequently the modelling is not accurate.

The submitted Transport Assessment also states that the only amenities within close proximity to the site are the village shop/hall and the Business Park up to 2km to the north – which is neither close nor relevant to the vast majority of prospective residents; yet the Report concludes this section by claiming "*the site has a good level of accessibility, both in terms of its proximity to local facilities and amenities.*" This is not correct, and highlights the bias and exaggeration of data/claims within this Transport Assessment. The submitted Traffic Assessment also omits two of the last three serious accidents which have happened along the road in the past three years. It is noted that cycling will be encouraged and a main form of sustainable transport. However, there are no cycle paths at or nearby to the site which would provide safe use of bicycles. Further, the narrow road which are heavily used by cars and lorries, do not provide safe means of cycling either.

The Parish Council commissioned their own traffic census in October 2021, at the point along Ecchinswell Road where the main access to the site is proposed. A summary of the results of this, and to come out of the Parish Traffic & Speed Working Group, are as follows:

- Much higher speeding figures compared with the applicant's submitted survey data
- Three serious accidents in last three years
- Roads not sufficient to accommodate the mass increase in traffic
- Road defects found, inadequate and misplaced warning signs, and need for improvements noted
- Cycling not safe along A339
- Vehicle movements likely to be much higher, due to the isolated nature of the site, limited public transport, lack of any nearby facilities, and assumptions made about the development/area.

The proposal is therefore considered to result in higher and unacceptable levels of transport movement, congestion and pollution, and it is not viewed that this additional level can be safely accommodated. Thus, the application conflicts with Local Plan Policy CN9.

It is requested to ascertain whether any studies have been carried out by Hampshire or Berkshire authorities, which could confirm an accurate situation for the area in terms of road capacity and safety in particular. If there is none, then it is suggested that a transport study is carried out by the Local Highways Authority prior to any consideration of positively determining such a major application.

Ecology

There are a number of sensitive and important ecological designations within and around the application site. Within the site there are 3no Sites of Importance for Nature Conservation SINC's; Bishops Green Farm Copse, Bishops Green Farm Woodland Strip, and Bishops Green Farm Alder Coppice. A couple of additional SINC's lie just outside the site boundary, and a further 27 SINC's are within 2km of the site.

Immediately to the north of the site, falling within West Berkshire's administrative area, is a Site of Special Scientific Interest (SSSI); Greenham Common. This highly protected nature reserve provides breeding habitats for ground nesting birds, among other habitats, which are particularly susceptible to recreational disturbance. Although the SSSI is within an adjoining authority, its close proximity to the site and pre-existing use by walkers from the area around the application site would result in further significant impacts on the protected area and its ground nesting birds in particular. This has not been adequately taken into account within the scheme or submitted information. Another SSSI, Bowdown Woods, lies just beyond Greenham Common and will also be affected due to its location within 2km of the site.

It is critical that both West Berks and Natural England provide comments in relation to impact on the SSSI(s), which presumably they will, and for this consideration to be given careful assessment.

However, it is considered the impact from such a large number of homes on the relevant SINC's and SSSIs will be significant, causing harm to these sites and protected species; thus being contrary to Policy EM4 of the Local

Plan and national policy. Furthermore, a number of other protected and notable species have been identified within and around the site, including: 8no species of bats, otters, water voles, 28 species of birds including Species of Principal Importance, grass snakes, slow worms, and protected invertebrates and flora. All of these species and habitats would be impacted to some degree by virtue of comprehensively developing the site.

Concern is also raised in relation to the potential impacts on the River Enborne. There will undoubtedly be greater levels of pollution as a result of the development, with subsequent consequences on the river which lies immediately to the north of the site. Greater levels of drainage and surface water output, sewerage overflow from already at capacity local sewer treatment works, potential increase in nitrates/phosphorous discharge, and pressures from recreation.

A 2017 study of the river by the Wild Trout Trust, in association with EA, found it to be in 'moderate' condition, with various steps needed to improve the quality over a 10 year period; including: identifying and addressing problems associated with diffuse pollution and surface water pathways capable of carrying nutrient rich sediments into the watercourse; have wider buffer zones and increased planting; and keep angling and other pressures light. A 2014 two-year study of water quality by Open Access Water found the river to be in a poorer condition, citing septic tanks, agriculture and nutrient discharge, and potential overloading of sewage treatment works at times of high rainfall to be issues. It is therefore apparent that the proposed development would contribute to the issues affecting the Enborne, and hinder its improvement programme.

Public Engagement

The Parish Council undertook their own community consultation events: on 15th December 2020 after the initial proposal; and on 8th September 2021 following Catesby's consultation. The results and opinions from these events were unanimous in their collective strong objection to developing the site. A total of 104 members of the public attended the Parish consultation events. The submitted Statement of Community Involvement is not considered to be reflective of the local community's view, with questions somewhat loaded, and claims exaggerated - such as changes to the scheme. This is evident from the already high level of strong objection to the application.

Other Matters

The following considerations are also matters of concern for the Parish Council, and should be addressed/assessed accordingly:

- Amenity: Impact of sewage treatment works on residents of the site, in addition to impact on existing residents in Bishops Green as a result of the increase in transport movements, pollution and activity. Submitted Odour Assessment is inadequate and acknowledges any increase in capacity/activity at the treatment works has not been taken into account.
- Lack of sewerage capacity: trucks already carrying away excess waste as the sewage works in the site is at capacity.
- Site is within a Mineral Safeguarding Zone: Not addressed and the area should be safeguarded from development such as this.
- Impact on PROWs: 2no PROWs run through the site. The character of these will change from a rural walk to a suburban housing development. Use likely to be affected or discouraged.
- Flooding: the northern part of the site is at high risk of flooding, and frequently does. Further flooding and surface water implications for the wider area, and as a result of the development.
- Lack of consultation with utilities: concerns regarding a lack of capacity and infrastructure, particularly in relation to high-speed broadband, sewerage, and electricity.

Representations

At the point of writing this letter of objection, it is noted that 142 representations have also been submitted to the Council regarding this application; albeit the publicity period remains open and it is likely further comments will be received. Presently, the breakdown of public comments can be divided into: 135 objections, and 7 letter of support.

The main issues raised within these representations, considered material to this Outline application, reflect the comments made within this representation and are as follows:

- Highway safety and congestion
- Scale of development out of character with rural area
- Detrimental impact on the countryside
- Ecological impact
- Insufficient infrastructure/utilities
- Insufficient amenities/facilities
- Public engagement inadequate and not published

Consultee Comments

Additionally, a number of consultees have raised concerns or objected to the application, summarised as follows:

Planning Policy: Contrary to Local Plan Policy, although no 5YHLS. Adverse impacts may include: flood risk, odour/noise from the sewage treatment works, landscape impact, sustainability and ensuring the development is sympathetic to the SINCs within the site. Any conflicts identified with wider policies in the ALP or NPPF will need to be considered in light of tilted balance.

Flood Authority Engineer: Insufficient information provide – no flood risk assessment or surface water management details.

Flood and Water Management Team: Discharge of surface water into existing lake, which is not considered appropriate. More information is also required in relation to surface water modelling; or an alternative storage mechanism is proposed.

Minerals & Waste Officer: Insufficient information – the proposal is contrary to Policy 15 of the adopted HMWP.

Waste Team: Insufficient information – requests swept path analysis and waste management strategy to include bin collection points.

Tree Team: Insufficient information – requests an assessment of impact that access and vis splays will have.

It is noted that a number of key consultee responses are still awaited: including Natural England, EA, Highways etc.

Summary

Ecchinswell, Sydmonton & Bishops Green Parish Council **OBJECTS** to this planning application based on the reasons outlined within this response and with the main points of objection summarised below:

- Unacceptable in principle, contrary to Local Plan Policies SS1 and SS6
- Contrary to the Development Plan as a whole
- Unsustainable; inappropriate location for major residential development, and measures to limit climate change not sufficient

- Undermines development of the Neighbourhood Plan and community led neighbourhood planning
- Excessive scale of development, at odds with the character of the area and size/function/character of Bishops Green
- Loss of / impact on the countryside and coalescence
- Impact on transport network, congestion and highway safety
- Impact on ecological sites, habitats and protected species
- Inadequate and misleading public engagement from the applicant, not reflective of the community's views

Given the size of scheme, level of public interest (objection), and deemed departure from the Development Plan, it is assumed that the planning application will need to be determined at Planning Committee rather than under delegated powers. Please could you confirm this is the case? If not, then we must insist that the application is brought to Committee for proper consideration, unless determined for refusal. We also wish to be notified about any Committee date and process as appropriate; as the Parish Council would wish to speak at Committee and provide further representations at any subsequent stage, where possible.

Yours sincerely,

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