

22/00183/PIP – Land adjacent to Woolton Hill Sports Club, Woolton Hill

Dear Sir or Madam,

This land would appear to be presently designated as agricultural land and would, therefore, require a change of use application, as a minimum, before an application to develop it for housing is considered.

The Planning Committee of East Woodhay Parish Council objects to the above application for the following reasons:-

1. The proposed development site is outside the Woolton Hill settlement policy boundary (SPB). This means that the above application does not meet the provisions of Local Plan Policy SS6 - New Housing in the Countryside, as there is currently no locally agreed need.
2. Furthermore, this is proposed development in the countryside, well outside the agreed SPB. The Parish Council and BDBC agreed the Woolton Hill SPB in the Local Plan to focus development and protect the countryside, especially as more than 99% of the Parish is in the North Wessex Downs AONB. This type of proposed development undermines the very purpose of the SPB, and raises the question of the purpose of a community agreeing to a SPB, if it is to become meaningless.
3. As mentioned at point 1, there has been no locally agreed need for this development. The site has insufficient supporting infrastructure - including local public transport - which is extremely limited. The Committee is aware that the GP Practices locally are at full capacity. The provision of / for clean and dirty water is also an issue in this Parish – especially the latter, where the Parish has seen huge sewage problems in the National Trust owned land known as The Chase.
4. **Emerging East Woodhay Neighbourhood Plan:** The application states: “The draft Neighbourhood Plan Consultation Version did not allocate any new housing sites.” This is because BDBC have not asked the Parish to make further allocations – some 65 new houses (excluding windfall development) have been delivered against a target in the current Local Plan of 10. It is considered that this Parish has more than delivered towards the overall housing target. This is confirmed by a proposed zero allocation for this Parish in the revisions to the Local Plan currently being discussed.
5. Through the emerging Neighbourhood Plan East Woodhay Parish Council is attempting to limit further urbanisation of the countryside within the Parish – development proposals of this type do not fit with the spirit of the Local Plan or the emerging Neighbourhood Plan, which is shortly to be submitted to BDBC for Regulation 15 Consultation. Neither does it fit with the East Woodhay Village Design Statement.
6. Furthermore, this kind of ‘ribbon development’ sees a joining up of houses at the top of the hill with the tennis club and housing along the road; this is specifically something which the emerging Neighbourhood Plan seeks to avoid in order to afford the greatest protection to the countryside.

7. The amenity of neighbouring properties will be harmed by development of the site. There are highly likely to be adverse impacts on neighbouring properties by reason of overlooking and loss of privacy.

In addition, the site is by a thriving, growing tennis club – with noise and floodlights; this does not seem like the most appropriate place for a development and future residents would have no right of complaint as the tennis club grows!

The sports club advises that it has been on the site since 1947 and because of its position outside the village settlement, it does not interfere with domestic homes through its use of floodlights on a timed basis. The club also advises that almost all visits to it by its members are made by car – as it is generally considered too dangerous for pedestrians to be on this section of highway. (See point 11 below)

8. As previously noted, the site is within the North Wessex Downs Area of Outstanding Natural Beauty. Para. 176 of the NPPF provides that, "Great weight should be given to conserving and enhancing landscape and scenic beauty in...Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues." The Committee is, therefore, unable to support further development of this type, which contributes to 'urbanisation' of the Parish.
9. **Scale of Development & Design:** The emerging Neighbourhood Plan identifies within this Parish a shortage of suitable and affordable housing for first time buyers, as well as small family homes and retirement homes/bungalows. This proposal does not address these particular shortages.

Further the reference to retaining a suitable access to the adjacent agricultural field raises concern regarding the possible future development of that field, which is in the same ownership as the land for the proposed development.

10. **Drainage:** Runoff water already pools on the road in heavy rain causing problems for traffic and pedestrians. There is likely to be an impact on the tennis club and housing at the bottom of the hill, as a result of development on this site. In fact there is a spring line at the bottom of the hill, as water runs onto the road most of the time. Further consideration should be given to this aspect of the proposal; noting that an adjacent neighbour advises that this land floods on an annual basis. (He has written to BDBC separately.)
11. **Highways:** The proposed site will apparently use the existing access off Woolton Hill Road. An area which is considered the highest risk road area within the Parish. The Parish Council has been undertaking a great deal of work on the safety of roads in the Parish and in this area, (noting that sadly there has been a death of a young person exiting the sports club) and, given that this is a rural area, the lack of street lighting and pavements.

Of particular concern is that this access is positioned off a 'blind bend' and the evidence gathered by the Parish Council confirms that the speed limit of 30mph is not adhered to.

A SID speed indicator was positioned opposite the Woolton Hill Sports club in the direction of the Trade street road junction. During the period of research 2321 vehicles passed the unit – approximately 464 – 499 per day. The following information was recorded:

- The 85th percentile speed was 34.7 mph. This is an important figure as it is our understanding that the 85th percentile is used extensively in decision making as it is indicative of the speed that the majority of road users are travelling. Yet some totally unacceptable speeds were recorded:
- 965 (34%) were over 30 mph.
339 (12%) were over 40 mph
81 (3%) were over 45 mph
18 over 50 mph
Top speed measured 60 mph.

The Committee cannot support the use of the existing driveway, or a new one, for additional homes in such a vulnerable and dangerous part of the highway and suggest that even at 30mph, pedestrians are at high risk on this 'blind' corner.

12. As made clear by paragraph 11 of the NPPF "...where ...the policies which are most important for determining the application are out-of-date, [permission should be granted] unless:

(i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

(ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

The Committee conclude that the adverse impacts of development on this site will "significantly and demonstrably outweigh the benefits, when assessed against the Framework policies when taken as a whole."

- Further, the absence of a 5 year housing land supply does not lessen the weight to be attached to the protection of an AONB. As mentioned at point 8 above, Paragraph 176 of the NPPF gives "Great weight to conserving and enhancing landscape and scenic beauty...." in such areas. BDBC have already made it clear that this Parish is not expected to deliver further housing contribution; as such the 'tilted balance' in accordance with paragraph 11 d)ii of the Framework does not apply to this application i.e. the adverse impacts of granting planning permission *would significantly and demonstrably outweigh the benefits*.

13. Furthermore, and at a time when the Parish Council is working extensively with BDBC to produce a Neighbourhood Plan, it is at best demoralising to know that if applications such as this are successful they would constitute 'windfall' development, the effect of which would be twofold. First, the nascent Neighbourhood Plan would be substantially undermined: and

secondly, the status of the quota, which Parish has already satisfied, will have been rendered otiose, creating carte-blanche for similar applications in the future.

The Committee respectfully request that this application is declined.

However, should it be approved then the following is suggested:

- It should be subject to the Neighbourhood Plan policies - housing mix, design, retention of trees and hedging etc.
- Consideration should be given to the provision of a footpath / pavement from the top of the hill to the tennis courts to provide safer access to the sports club – in accordance with the emerging Neighbourhood Plan Policy TT1 where the Parish is seeking sustainable transport from all new development.

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.

Yours faithfully,

Planning Committee
East Woodhay Parish Council

DRAFT