



Appendix 3

Shrivenham Parish Council's response to the amended plans for up to 59 homes on land off Longcot Road P13/V1514/O

Shrivenham Parish Council strongly **objects** to the above application for the following reasons;

This site is located in the South of Shrivenham and does not form part of the strategic site, to the North of the Village, included in the emerging Local Plan. As the Vale has made provision for sufficient homes to meet the previous shortfall as well as the projected need, development of this site is not acceptable and unnecessary.

In the applicant's covering letter it states that the "Parish Council's concerns relating to the suggested easement running North to South through this site, had been addressed with the previous case officer." This is untrue. The Parish Council has been in contact with Thames Water and has been assured that the easement is valid and ease of access will be required. The proposed layout will result in the water pipe running under a number of properties. Both the Vale and the applicant have had access to this information, which was submitted by Thames Water in August 2013 and a copy of which has been attached, and yet it has been ignored.

This is one of many areas where the applicant has based its evidence on guesswork or assumption.

Great Crested Newt Survey

The Parish Council is not satisfied with the study carried out on the Great Crested Newts and insist that another, fully independent, survey be undertaken. The areas studied appear to have been cherry-picked. Some householders in Vicarage Lane were not notified, some of which are known to have ponds that support populations of Great Crested Newts and others were ignored. Number 41 Vicarage Lane was only surveyed once.

The Thames Water flood lagoon and the canal were not surveyed at all. This is not acceptable. Prior to the protection of Great Crested Newts, a large number were released into the lagoon and we insist that this important area be surveyed. During the month of May, Great Crested Newts were spotted in the Pocket Park that borders the canal. These are a protected species and it is negligent to submit a survey based on guesswork and expect it to be accepted.

It is mentioned in the applicant's covering letter that Ecosulis, responsible for carrying out the study, has amended their mitigation report, which has resulted in the inclusion of seven ponds along the Southern boundary which are visually artificial

and stages. We are aware that the officer with responsibilities for GC newts had questioned the adequacy of the initial report and yet fail to see how amendments can be made or recommended without having an accurate initial report. Yet more supporting documentation based on guesswork.

Soil Contamination

Paragraph 4.4 of the Flood Risk Assessment states that soil analysis has yet to be carried out on the site and that "historical maps for the area indicate that no significant development has occurred on the site which would suggest the potential for soil contamination." Prior to the construction of the Glebe Close exception site, approximately 60 metres away in the neighbouring field to the South West, soil analysis was carried out. The results showed elevated levels of arsenic and nickel in the topsoil and underlying natural sand deposits, above SGV's for residential land use. This resulted in a metre of topsoil being removed from the whole site and safely disposed of at considerable cost. Due to the close proximity of the Glebe Close site it is extremely likely that contaminants are present. The Parish Council recommends that soil analysis be carried out prior to the application being decided. The 2007 soil analysis report was submitted with the Council's previous responses.

Landscape and Visual impact

The proposed site is situated on the Southern edge of the village with far reaching views across to the North Wessex Downs Area of Outstanding Natural Beauty. However, the heavy planting along the Southern boundary, as shown in the updated landscape plan, will result in these views being completely obliterated.

The land is used for agricultural purposes and has been confirmed as Grade 2. With current concerns regarding future food supply it is important that agricultural land of this quality should be retained.

Although there is a public footpath across the land the tenant farmer allows unrestricted access. The open fields along the South of the village offer important areas for recreation and as such are regularly utilised.

As you approach the village the current view from the Longcot Road, with its individually styled houses at a very low density, is aesthetically pleasing. This would be replaced by a modern housing estate which would visually detract from this beautiful setting.

No reference should be made to the Glebe Close site situated to the South West of the proposed site as this was developed as an exception site in conjunction with the rural housing needs study and should not be used as evidence of a precedent. The site has suffered subsidence. Approximately 25 years ago an area of land fell away of sufficient depth to have accommodated a Land Rover. The hole was subsequently filled in.

The landscape plan also shows an expanse of 'buffer' planting on the land that borders the existing properties in Vicarage lane and Stonefield Close. Experience has shown that these areas will probably be used as a dumping ground for garden waste. What measures are proposed to ensure that this does not happen? The countryside officer has also expressed concern over the future management of this area as well as potential security issues.

Flood Risk Assessment

Paragraph 2.4 of the Flood Risk Assessment states that the purposes of this report are: "To satisfy the planning authority that the most sustainable foul and surface water drainage solutions have been considered."

The Thames Water Sewer Impact Study confirms that the foul sewer network does not have any available capacity to accept the proposed development flows and proposes two options. However, the maps used in this report are outdated. There is now a residential dwelling on part of the field where it is proposed to locate a 470m³ storage tank and spill weir. It should also be noted that this "cesspit" would be on land owned by the Ministry of Defence and situated immediately behind the homes of their personnel.

The Parish Council expects the Ministry of Defence to submit their own comments regarding both of the proposed options as the impact would be significant.

Paragraph 4.10 makes reference to the overland (pluvial) flow that will occur following the topography of the land should the ground become saturated. This is a recurring problem on the site as well as the land to the South West, as the previously submitted photographs show and yet **paragraph 6.27** states that appropriate SUDS techniques will ensure that the peak rate of surface water leaving the developed site is no greater than the existing Greenfield runoff rate. With 14.935 ha of impermeable area on the proposed site where overland flow is a recurring problem surely, due to the topography of the land, this water will continue to pool to the North of the site and in the neighbouring gardens in Vicarage Lane?

The Parish Council refute the comments made in **paragraph 8.8**. Local knowledge suggests that the soil conditions will **not** have a suitable permeability to enable infiltration. Therefore it **cannot** ensure that the entire surface water runoff from the development for all storm events can be discharged at source via infiltration to the ground.

With the Linden Homes development at Station Road/Townsend Road, the Parish Council repeatedly warned of the ground saturation problems and was ignored. Unfortunately the new residents have been left to face the consequences.

The Council recommends that a permeability test be conducted on the proposed site prior to the application going before the planning committee.

The National Planning Policy Framework requires that new developments do not exacerbate flood risks to the development site and to offsite parties and land, which means there is a need to control drainage and runoff to ensure there are no increases in overland flow as a result of the development

Site Layout

There appears to be no change in the proposed housing mix. The original proposal suggests that only 14 two bedroom properties will be provided. This represents only 23% and is contrary to policy **H16 which requires 50% of the development to be consisted of 1 or 2 bedroom dwellings**. There are no 1 bedroom properties proposed and 36% of the market rate houses have 4 bedrooms.

In 2011 Shrivenham Parish Council, in conjunction with ORCC's Rural Housing Enabler, distributed a housing needs survey to all its residents. Over 50% of respondents live in housing with 4 or more bedrooms and a large number are the sole occupants. In fact, the majority of homes in this village are of this type. What is clear from the results of this survey is that there is a need for smaller, more affordable homes. There is a lack of 1, 2 and 3 bedroom properties in this village and yet developers overlook this fact and opt to build larger homes, proving that these developments are cash driven. This is contrary to NPPF P.19 "identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand" & also at odds with NPPF P.9 "Plans and decisions need to take local circumstances into account." It also contradicts Core Policy 21 regarding housing mix.

Location and Highways

Policy DC5: Access sets six key requirements which developments must meet in order to be permitted. This scheme fails on three of the six key requirements.

The amended plans show the inclusion of a small area of footpath on the corner of Longcot Road and Vicarage Lane.

The previously submitted, image 1, shows that should residents use this as their route for accessing the village then this will mean crossing Vicarage Lane, then

Longcot Road twice before they reach the sharp left-hand bend. This has been described by the Vale as "not ideal." **At what point does "not ideal" become "not acceptable?"**

What will actually happen is that residents will use Vicarage Lane as a short cut. It is not possible to provide a footpath along Vicarage Lane as it is evident in **image 2** that the gardens abut the road.

The applicant is aware that vehicles regularly travel along Longcot Road in excess of the speed limit, which adds to the Parish Council's concerns that the lack of visibility splay from the site will render it hazardous, particularly to the frequent cyclists, joggers as well as any new residents travelling on foot.

Vicarage Lane, despite being a single lane in places, is regularly used as a rat run. The footpath runs intermittently resulting in residents having to walk on the road. Due to property boundaries the footpath cannot be extended. The addition of 59 homes will only exacerbate the problem.

The positioning of the entrance along Longcot Road only serves to add to the lack of cohesion from the rest of the village.

The Parish Council totally agree with the Urban Design Officer's original comments that "Although the masterplan now provides links into the footpath adjacent to the Southern boundary, all the existing services and facilities in Shrivenham are beyond the 400m walkable neighbourhood (as set out in the agent's email). This location, combined with a single vehicular access point and no-through road, restricts the extent that the development can achieve physical and social integration with the existing settlement. Two key qualities necessary to create a good place are firstly, that development should be conveniently accessible by multiple modes to ensure a high level of permeability and secondly, that it is within easy reach of a good range of mixed uses and facilities. Consequently, the site does not deliver fundamental aspects intrinsic to high quality design. This situation is symptomatic of ad-hoc development. If the principle of residential development is accepted on this site, the layout, as a minimum, should incorporate the potential for future extension to land to the **Southwest.**" The recommendation in the last sentence is no longer an option as the Southern allocation has been removed from the Local Plan.

It is unclear as to whether the applicant is still suggesting that the public footpath, which runs across the neighbouring site to Stainswick Lane, be used as an additional access to the site. As mentioned in our previous response the footpath crosses a paddock outside the applicant's control and this land will not be developed in the future. In the South Western corner of the proposed development there is a stile and where the footpath meets Stainswick Lane there is a heavy metal gate, as shown in **image 3**, neither of which would be suitable for the infirm or residents with pushchairs. You will notice that the footpath across this land is a muddy track so the

wearing of wellington boots would be necessary and in periods of heavy rain the area becomes waterlogged, as is evident in **image 4**. With this in mind it is inconceivable that this footpath could even be considered as a regular means of accessing the village.

Stainswick Lane is a narrow road with insufficient width to allow two cars to pass. The national speed limit applies which results in vehicles travelling along the lane at speed. **Image 5** was taken from the gate adjoining the footpath and highlights the issue of the bend in the road. Although it is a no through road, this lane is regularly used. Network Rail has a compound at the Southern end of the lane and heavy machinery is transported to and from this compound. There is also the issue regarding HGVs using the lane to try and access Stainswick Farm. Despite it being a no through road SAT NAVs lead these unsuspecting drivers to a dead end. One of these vehicles became stuck, blocking the lane for two hours.

There are no footpaths or street lighting along the lane and therefore it could not be recommended as a suitable means of regularly accessing the village.

Table 5 in the original Transport Statement illustrating the 'modal share for Shrivenham and the Vale of White Horse', show that 71% of its residents travel to work by car. An independent study of the A420 carried out on behalf of the Western Vale Villages Consortium, shows that there is insufficient capacity on the A420 to allow for further development in Shrivenham and the neighbouring villages. A copy of this document is attached.

Sustainability

The Defence Academy and its 5000 staff and personnel regularly use the facilities in Shrivenham, as do residents of the surrounding villages and the applications that have been approved in Shrivenham and Watchfield will impact heavily on our village. This application will be of no benefit to our village. It's location will result in an increase of vehicles accessing the already stretched services.

It should also not be forgotten that the proposed Swindon eastern expansion of 8000 homes which is located less than a mile from our boundary will have a major impact on our village.

Conclusion

The comments submitted in the Parish Council's previous response still stand but it needs to be stressed that the Southern area of Shrivenham is stunning, with far reaching views from the site to the White Horse.

The Parish Council recently carried out a Community Survey in conjunction with the Vale of White Horse District Council. The response rate was extremely good and the overwhelming view is that there should be no development to the South of the village, an opinion shared by the Vale and resulting in its removal from the Local Plan.

This development is of no benefit to the village, and no consideration has been given as to the effect it will have on the current and future residents of Shrivenham.