

Shrivenham Parish Council's Response to Planning Application P15/V0663/O, Land off Townsend Road, Shrivenham.

At the extraordinary meeting of the Parish Council, held on Tuesday the 21st April 2015, the Council decided unanimously to recommend that this application be **refused** for the reasons set out below.

Sustainability

Paragraph 7 of the NPPF describes three dimensions to Sustainability; Economic, Social and Environmental. This application fails the Social and Environmental criteria for the following reasons:-

Traffic

The Parish Council recognise that traffic is a reserved matter and yet feels that it is far too important an issue to be left until the application has been determined. The proposed development will contribute to increased traffic congestion and will detract from safety and it is strongly recommended that a comprehensive Traffic Impact Assessment is undertaken prior to determination.

The applicant's Transport Assessment and Framework Travel Plan give cause for concern. Having read the same documents submitted by Gladman for other applications, the content and claims are remarkably similar and in some cases identical, with little consideration for accuracy or viability.

At 3.2.3 in the Travel Plan the applicant refers to Paragraph 17 of the NPPF stating aims to 'actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.' The document goes on to talk of "...practical measures aimed at reducing car use." And suggests at 4.4.5 that, when travelling to Swindon railway station "cycling is also a viable option." The A420 is a notoriously dangerous road and cyclists are not commonplace as there are very few prepared to take the risk. Section 5 sets out the aims of the Travel Plan including the offer of a personalised travel plan to new residents and the prospect of promoting car sharing suggesting that "it is likely that a proportion of residents will be travelling to locations in close proximity to one another." Another random statement of no substance and with no evidence to back it up.

Whilst the objective of reducing private car travel and encouraging healthier and more sustainable travel methods is undeniably desirable, the applicant's objectives are irrelevant to the containment of the growing local traffic problems.

This development will generate an estimated 232 extra cars. The site is on the edge of the village and over 1000m away from the school and amenities in the local area. It is inevitable that many of the c 232 extra cars will be used to travel into the village,

and with so few employment opportunities provided by this development and elsewhere in Shrivenham, the site will inevitably become a commuter estate.

The assumption that the new residents will adapt to the required sustainable travel methods is naïve. Residents will wish to travel as they see fit and are not likely to behave any differently to those who currently live in the village.

Whilst the applicant may feel that the described measures are in line with the NPPF, they will not make any noticeable difference to the certain increase that this large development will generate.

There appear to be major discrepancies regarding the figures quoted in the 'choice of transport modes in the Transport Assessment document and the Assessment of Current and Future Sustainability report. All claim to have originated from the 2011 census and yet they are not consistent, some by as much as 12%. There are also errors in the Transport Assessment. The index mentions *Rushton Road, Dunkirk Avenue, Gladstone Street* and the *Supermarket* Capacity *Assessment* which obviously formed part of another of Gladman's applications as they are of no relevance to our village. It also makes reference to the current and decided applications for Shrivenham and yet the figures quoted are incorrect. This calls into question the accuracy of the report in general.

It is also worth highlighting that the Transport Assessment was produced in July 2013. At 6.1.6 there is the suggestion that 'The PICADY assessments show that the junctions assessed within the highway network would operate well within capacity and would adequately accommodate the development proposals.' This is not the case, as the highway authority are well aware. The independent Transport Assessment that was carried out by Bob Hindhaugh Associates has indicated that the Bourton Wharf junction is at capacity during peak times. This study, along with further consultation with the highways authority has resulted in land being banked for the future improvements to the existing junction. Land which is located adjacent to the proposed site.

The timing of the applicant's assessment is also called into question. The study was carried out over a 1 day period at a time when the Defence Academy was operating at a much reduced level. The majority of courses had come to an end resulting in a reduced number of vehicles entering the village.

The accident data supplied is not comprehensive. A large number of residents travel along the A420 towards Swindon, the M4 and M5 resulting in the majority of their journey taking place close to and within the Wiltshire boundary. Had the applicant chosen to request this data then it would have become clear why so few cyclists travel this route.

Speeding traffic is of great concern to the residents of Shrivenham and yet there is no evidence of any speed data analysis or traffic calming proposals. This is alarming as despite the clear 30mph signage as well as the illuminated speed limit sign, motorists regularly travel well in excess of the limit along Townsend Road. Section 4 of the submitted Transport Assessment references the NPPF *'….safe and*

sustainable access can be provided for all.' With this in mind, the application does not comply with the necessary requirements of the NPPF or Policy DC5.

<u>Drainage</u>

Again whilst recognising that drainage is a reserved matter, its importance is so critical to this site that it warrants close investigation. There are fundamental questions to be addressed concerning the applicant's proposals for foul sewage and surface water drainage.

The applicant has stated that there is no foul pipe network on site and that a connection will need to be made along the Townsend Road at the junction with Colton Road.

Neither Rhymes House nor Swanhill Farmhouse are connected to a foul network, instead relying on septic tanks. The same applies to the properties on the opposite side of Townsend Road.

It is important to note that the Rhymes House septic tank has a grey water outflow that drains directly into the proposed site.

The applicant is correct that there is no capacity in the foul network and is proposing that a connection be made along Townsend Road. There is a significant fall of approximately 10m across the site and the reliance on a gravitational pump is a concern. These pumps can fail, as has happened on the Glebe Close and Mortree Close site, which resulted in raw sewage backing up into residential properties.

7.2.3 of the Surface Water Drainage Strategy states that 'By mimicking the pre development peak runoff at its point of discharge into the small watercourses by the inclusion of SuDS, this will reduce surface water flooding impact onto the downstream catchments.' The lack of permeability due to the clay based strata is evident with water runoff flowing from the site onto and across the Townsend Road. The runoff is regular and significant enough that it has eroded the coloured speed restriction tarmac and during cold spells freezes to form a sheet of ice across the road. Further evidence has been reported by the residents of Rhymes House who, whilst excavating the front of their property, noticed that at a depth of around 2 ½ft the area began to fill with water.

It should also be noted that attenuation ponds located close to built up areas pose a safety risk to small children.

Given the importance of both the foul and surface water drainage to this development all concerns should be fully investigated and satisfactory solutions found prior to determination of the application.

Site Location and Landscape

The site is located on the western edge of Shrivenham, and consists of 5.19ha of agricultural land, most of which is used for arable crops. According to the VWHDC's SHLAA, the land is designated as Grade 2 under the Agricultural Land Classification. This land has been used for farming purposes for centuries and should not be built upon particularly when sufficient lower grade land is available to meet all planning needs to the north of the village. Paragraph 112 of the NPPF states that 'Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.'

The site is some distance from the local amenities. The distances quoted within the documentation are neither consistent nor accurate. From the centre of the site the nearest shop is 980m away, whilst the school and Doctor's surgery measure 1200m which are beyond the recognised acceptable walking distance.

The boundary to the neighbouring parish of Bourton runs along the western edge of the site which acts as an important rural buffer between the two villages. Swanhill Farmhouse falls within the parish of Bourton.

Throughout the Landscape and Visual Impact Assessment references are made to 'glimpsed views' and 1.13 suggests that 'overall it is considered that the development will generally have a significant effect of moderate upon the visual environment and that the effects will be limited to the localised setting of the site.' The applicant also suggests in 4.2.3 that '...the existing established vegetation structure which defines the northern, western and southern boundaries, ensures that the site is, to a large extent, visually separate from the wider landscape context.' This is contradicted in 6.25 which mentions '....the more open nature of the western site boundary at this point allowing views into the site.' The Parish Council believe that the effect will be far more significant due to the topography of the site and the relatively low level, loose planting that surrounds the site. Views from the A420 towards Shrivenham consist of green fields with the tops of the houses in Cleycourt Road visible at the peak of Swanhill, giving the appearance of a hilltop settlement. The proposed site is clearly visible from this distance. As you approach the village evidence of the past remains in the form of Swanhill Farmhouse and Rhymes House.

In terms of the wider landscape setting the assessment considers that, due to the existing established vegetation and the visual separation, the Lowland Vale context is of medium/high sensitivity to change. Again, there seems to be an over estimation of the effect the boundary planting has on the site's visibility and no consideration has been given to the topography or the visual impact from the public rights of way.

The Cultural Heritage Desk Based Assessment suggests that there is no evidence to suggest that the site has ever formed part of the Stallpits or Sandhill Farm estates. This is untrue. Until the latter part of the last century the site formed part of the Stallpits Farm estate. Rhymes cottages were inhabited by its farm workers. The majority of the estate including the farmhouse was purchased by the then owner of

Sandhill farm. Stallpits Farmhouse has since been sold but the land has been retained and is incorporated in the current Sandhill Farm estate.

There is also evidence of extant ridge and furrow on the north-eastern third of the site, dating from the Medieval or post-Medieval. This is of local significance.

With this in mind, the proposals do not meet the objectives in Core Policy 44 or saved Policy NE9.

Residential Amenity on Neighbouring Properties

The applicant acknowledges that, in respect of the residential amenity on neighbouring properties, the development of the site will result in a noticeable change. 6.5 of the Landscape Assessment states that 'GLVIA guidance notes that, greater weight should be given to the effect upon views from rooms occupied during daylight/waking hours and as such the effect of the proposals upon views from these rooms, is considered to be minimal.' Without the availability of a full illustrative masterplan it is not possible to establish the actual effect the proposed development will have on Rhymes House, however, the applicant could not have failed to notice the glass lift located at the front of the property that links the ground floor to the first floor and which was subject to planning approval.

The lift was installed to accommodate the needs of the occupant who, whilst serving his country, sustained significant injuries resulting in the loss of limbs.

From the site boundary and beyond it is possible to see into the living areas of Rhymes house as well as the upstairs landing. This is not currently an issue but the addition of houses and street lighting will give potential residents a direct view from the site into the living areas of Rhymes House which will be particularly intrusive when darkness falls.

Policy DC9 states that 'the proposed development would not be permitted if it would unacceptably harm the amenities of neighbouring properties.'

The Inspectors decision in respect of the Sixpenny Wood development states that: 'There is no right to a view per se, and any assessment of visual intrusion leading to a finding of material harm must therefore involve extra factors such as undue obtrusiveness, or any overbearing impact leading to a diminution of conditions at the relevant property to an unacceptable degree.'

Density and Housing Mix

The proposed density is described by the applicant as low. However, at 31.27 dwellings per ha it exceeds the density of the existing housing in Cleycourt Road which is approximately 20 dwellings per ha and is therefore not compatible with its existing surroundings. This is particularly relevant in relation to Rhymes House and Swanhill Farmhouse. The character and isolation of Rhymes House will be lost and it will be forced become part of a housing estate. The location and density of the

development will create a detrimental first impression on entering the village from the A420.

Whilst the approved application for 240 homes on the land off Highworth Road has a similar density it is proposed to use a lower density towards the edge of the village. There is nothing within the documentation submitted for this application to suggest that this will be the case here.

Core Policy 23: Density, suggests a 'minimum density of 30 dwellings per hectare unless specific local circumstances indicate that this would have an adverse effect on the character of the area, highway safety or the amenity of the neighbours.'

Whilst the application is for outline permission, there seems to be an underlying theme relating to the provision of housing and high income levels '...there is an opportunity to provide a housing supply in the village that is tailored to the needs of these groups in order to continue to attract higher earners in to the village...' This no doubt explains why half of the total number of homes proposed are anticipated to have 4 or more bedrooms of which there is already a more than adequate supply within the village. The proposals exceed the recommended mix, as set out in the SHMA for dwellings with 4 or more bedrooms and is contrary to Core Policy 22.

Air Monitoring and Noise Assessment

The noise levels generated from the A420 are significant and will dictate the layout of the proposed development. Mitigating measures will need to be incorporated into the design such as close boarded fencing or walls, and houses will need to be positioned to ensure that the appropriate noise levels are obtained in both outdoor and indoor living areas. These measures, whilst necessary, could result in a layout that is not in accordance with best practice in residential design terms. More importantly, it is probable that the site will become more visually obtrusive particularly with the inclusion of a 4.3m high noise barrier which will have a negative impact on the landscape.

The applicant has submitted a letter regarding air quality which has raised no issues. This is surprising bearing in mind the exhaust emissions that are given off by stationary vehicles that queue along this stretch of the A420 on a daily basis. It is therefore recommended that the applicant carry out a full air quality assessment.

Public Consultation

Some residents of Shrivenham received a flyer through the post that set out the applicants proposals. It is common practice for developers to hold a public consultation in the local village hall to afford residents the opportunity of viewing the proposals and asking questions. Gladman did not adopt this approach and instead residents were asked to submit their comments via a website with no prospect of a response. Not all of Shrivenham's residents have access to the internet so have, in effect, been excluded from the consultation process.

Local Services and Sustainability

There is too much emphasis put on the sustainable aspect of Shrivenham with little regard to the impact the Defence Academy and the surrounding villages have on our infrastructure.

There are few amenities available in these villages therefore residents are reliant on those that Shrivenham has to offer, particularly the surgery and Post Office. The majority of these residents have no alternative but to travel here by car and are forced to park illegally due to a lack of parking facilities. As the High Street is linear there is no possibility of expansion to provide additional parking.

Nearby Watchfield is set to double in size. It has very few facilities and those in Shrivenham have been used to justify this expansion.

As a result of current developments, the Doctor's surgery has been forced to reduce its catchment area to enable them to cope with additional demand.

The Defence Academy is a Military establishment and as such offers only limited employment opportunities to those with specialised academic qualifications. Supporting roles are provided by contractors who, due to the economic climate, are filling vacancies with staff who are surplus to requirement in other areas. The majority of personnel are transient which effects statistics relating to the village, often giving a false impression.

Reference is also made to the business park which is located in Watchfield. Many of the units are occupied by sole traders or are used for storage. In reality, the majority of our residents travel outside of the area for employment.

Within the emerging Local Plan strategic sites have been allocated for the provision of 500 homes. To date, planning permissions have been granted for 410 dwellings in Shrivenham, due to the lack of 5 year land supply, which represents a 44% increase on the existing 934 homes. A further application is expected which will form phase 2 of the strategic sites, and with the inclusion of this application the total increase will be 84%. An additional 1,886 residents.

It should also be remembered that the Swindon Eastern Expansion of 8000 homes is due to take place less than a mile from Shrivenham's boundary.

How many applications have to be approved before Shrivenham is no longer deemed sustainable?

Cumulative impact is a material planning consideration and should be taken into account when determining this application otherwise Shrivenham will no longer be an attractive rural village but an urban extension to Swindon's sprawl.

Conclusion

This is an unsustainable development that will have a significant detrimental impact on the current landscape setting.

The development site abuts the boundary with Bourton.

The proposals will negatively affect the residential amenity of the neighbouring properties.

The Grade 2 Agricultural Land Classification should be preserved and development diverted to land of less importance.

The location of the site will lead to the additional use of cars.

The junction of the A420 at Bourton is at capacity at peak times.

No speed data is available and there is no traffic calming proposed.

The cumulative impact of all the proposed developments will destroy the character of the village.

Whilst not a material planning consideration, the application form that has been submitted claims that the proposals do not require any diversions/extinguishments and/or creation of rights of way. This is incorrect as the occupants of Rhymes House have a legal right of access over the site which is set to be diverted.

BOURTON PARISH COUNCIL

Clerk - Mrs Maggie Brown The Old Barn Bourton, Nr Swindon Wilts SN6 8HZ

Vale of White Horse Planning Department

For the attention of Mr A Butler, Case Officer

Dear Sir

PLANNING APPLICATION P15/V0663/0 LAND OFF TOWNSEND ROAD, SHRIVENHAM SN6 8HR Outline Planning Application for a residential development for up to 116 dwellings

Bourton Parish Council has already objected to the inclusion in the Local Plan of Shrivenham's strategic sites to accommodate 500 new dwellings. In advance of the development to accommodate these 500 houses, we have already seen 170 other dwellings either granted planning or already in existence. This in a village which had less than 900 houses until a few short months ago. This in fact means that the development proposed for Shrivenham in the Local Plan almost amounts to that proposed for the Vale's principal town of Abingdon. It has neither the road infrastructure, the employment possibilities, appropriate retail facilities, school places, doctor's surgeries etc etc to accommodate the level of growth the Vale is already proposing and we have now had almost half of the strategic development of 500 houses granted planning permission with building to start shortly.

Bearing in mind that this planning application site is not included in the strategic growth for Shrivenham in the Local Plan, it should be refused. It is just not sustainable, necessary or required by anyone who lives in this part of the Vale (apart from the landowner of course). If you do not object to this site, all of the other sites that you identified in the SHLAA will feel that it is a complete free for all in Shrivenham and will be adding their planning applications to the system as soon as possible. Even without this site, Shrivenham will see an 84% increase in housing numbers which amounts to approximately 1886 extra residents. As planners, you owe it to the good people of Shrivenham and the surrounding area to pull up the drawbridge and say "enough is enough; any further development in this village cannot be sustainable."

Bourton Parish Council's main objections to this application are as follows:

- 1. Any planning application in Shrivenham of this size which is adding to an already unsustainable (in our view) amount of development should not be decided on an outline application. Both residents of Shrivenham and Bourton should be granted the courtesy of seeing exactly what Gladman has in mind. As the planning authority, you should insist on this. When assessing sites for housing for the new Local Plan, planners removed a site in South Shrivenham because of its impact on the AONB and because the residents preferred the strategic development to take place in North Shrivenham. This site is clearly to the West of Shrivenham and is outside the village envelope.
- 2. National guidance states that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes (paragraph 109 of the NPPF). Paragraph 6.120 states that "this will be achieved by preventing visually prominent or unsympathetic development". I urge you to do just that. This is the Vale of the White Horse the clue is in the name. Development of this site so clearly outside the natural boundary of the village and not visually contained within it would have a detrimental impact on the surrounding landscape and the main approach to the village. Because of its location on a slight rise into the

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village, it will be particularly visible and intrusive. The proposed density of the site is not appropriate for an outlying site in the village and 2.5 storey houses is out of character.

- 3. The nuclear settlement pattern of the village would change causing an adverse visual impact on the setting of the AONB. The village boundaries would be elongated and increasingly urbanised to the West of the village. The natural boundaries of the historic village will be lost, changing the character of the village forever. The cumulative impact of all the proposed developments will have an adverse effect on the landscape and destroy the very character of the village.
- 4. This site forms part of the greenfield land between Shrivenham and Bourton parish and is a vital area of non-coalescence for our parishes which acts as an important rural buffer between two beautiful Vale villages and the Eastern Villages development of 8000 houses just across the border in Wiltshire. Both the Vale and Swindon Borough Council have signed up to the necessity to have this rural buffer to protect Bourton and Shrivenham and this undertaking would be undermined if land to the West of Shrivenham is allowed to be built upon.
- 5. Shrivenham lies within the Lowland Vale; the countryside which lies between the AONB within the district and the North Vale Corallian Ridge. The Local Plan 2011 states "This area has been celebrated for the contribution it makes to distant views from the higher land" and it is also "distinctive and valued for its own quality". Policy NE9 from the Vale of White Horse Local Plan 2011 (saved policy in Local Plan 2031) states that "Development in the Lowland Vale will not be permitted if it would have an adverse effect on the landscape, particularly on the long open views within or across the area". This development would certainly have an adverse effect on the open views across the area and is therefore contrary to Policy NE9.
- 6. The development would harm the setting of heritage assets, ie nearby Grade II listed buildings. You cannot hope to surround Shrivenham on all sides with new and much higher density development and still retain the historic feel of the conservation area and the village itself. The setting of the listed and historic buildings dating from the 17th century will be lost between yet another development site. Swanhill Farmhouse, which would be adjacent to the development, is actually in Bourton parish in a remote location and deserves the protection that the Local Plan gives to our village. Views from Bourton's conservation area and the Grade II listed railway bridge at Lower Bourton would be affected.
- 7. There is no employment expansion proposed for Shrivenham and this development will certainly not create the jobs it professes to, there are inadequate local services, the local primary school is almost full, there are no secondary schools within 7 miles and therefore any new residents will be totally reliant on private cars for their everyday needs. Gladman are proposing this development despite the requirement in NPPF Paragraph 158 that "strategies for housing and employment in local plans should be integrated" and that the need to "travel to work" should "be minimised" (NPPF 4.34.)
- 8. Residents of Bourton and surrounding villages, which have no facilities at all, rely on the local services that Shrivenham has to offer, particularly the post office and doctor's surgery. We have no alternative but to travel by car and are often struggling to park in the High Street with its limited parking facilities which cannot be expanded. Gladman's documentation is misleading when it is quoting distances from this site to local facilities. The nearest shop is 980m away, whilst the doctor's surgery and school are 1200m which are beyond the recognised acceptable walking distances. Therefore the location of this site will lead to the additional use of cars driving into the centre of the village to access the limited local facilities.
- 9. At this end of the Vale, there are severe highway constraints on the A420 that will have to deal with the huge amount of extra traffic that will be produced as a direct result of the 2000 houses in the A420 corridor at Shrivenham, Watchfield (recently built) and Faringdon not to mention the 8,000+ homes and 40 hectare warehouse employment site just across the Oxfordshire border East of Swindon. The Transport Assessment that was conducted during the holiday period in July 2013 is totally inadequate. The A420 was closed last year in July/August because it is acknowledged that the traffic is lightest at that time of year and this assessment took place when the Defence Academy was operating at a much reduced level as the majority of courses had

come to an end resulting in a reduced number of vehicles entering the village. Any Transport Assessment should also take into account the development that is shortly to arrive from both the Vale and Swindon Borough Council's Local Plan proposals. It should also be noted that the independent Transport Assessment carried out for the Western Vale Villages Consortium by Bob Hindhaugh Associates has indicated that the Bourton junction is already at capacity during peak times.

- 10. Most worrying is the fact that Gladman has not acknowledged the fact that the Vale has safeguarded land very close to this site for the new junction on the A420 for Bourton/Shrivenham to accommodate the growth being proposed in the Local Plan. Oxfordshire County Council is currently making an assessment of the A420 in LTP4 and looking at the possibilities for a roundabout at the Bourton junction. The Canal Trust have put forward a scheme, supported by Bourton Parish Council, which would accommodate the safeguarded canal and also provide a new roundabout in this area. The fact that this site encompasses land along the A420 corridor will reduce the flexibility of Oxfordshire County Council to consider such a solution and therefore we are calling on the Vale to safeguard ALL of the land along the A420 corridor to North Shrivenham (including that within this site) in order to retain flexibility for important transport infrastructure improvements. Clearly Gladman, if successful with their planning application, would need to provide a large contribution to any new junction.
- 11. The Air Monitoring and Noise Assessment reports are also totally inadequate. Bearing in mind the huge growth in the level of traffic on the A420 over the next 5 years when this site is proposed to be built out, this needs to be included in the data. Consideration will also need to be given to the effect that the new roundabout to serve Bourton and Shrivenham will have on this development. The fact that cars and heavy goods vehicles travelling along the A420 are likely to have to apply brakes as they approach this roundabout and possibly join a long queue adjacent to this site for large parts of the day, will impact both on the noise and emission levels. Traffic regularly queues adjacent to this site now because of the congested A420 approach into Swindon.
- 12. The vision splays on the access road from the site onto Townsend road are inadequate. The traffic along Townsend Road is likely to increase significantly in the future and the proposals do not take this into consideration in an appropriate manner. There are no traffic calming measures proposed and Gladman have put traffic as a reserved matter. This cannot be allowed.
- 13. 8.5 of the Planning Statement says Gladman are not currently aware that a Neighbourhood Plan is being produced for the settlement of Shrivenham. They are out of date and badly informed.
- 14. The site consists of mostly Grade 2 Agricultural Land that has been used for farming purposes for centuries and should not be built upon particularly when sufficient lower grade land is available to meet all the planning needs to the North of Shrivenham. This application is therefore contrary to Paragraph 112 of the NPPF.
- 15. There are already water pressure issues and sewage issues in the locality of which Bourton residents are well aware and therefore, given the importance of both the foul and surface water drainage, along with water supply, this needs to be fully investigated and satisfactory solutions found prior to determination of the application.

Bourton Parish Council unanimously opposes this development and call upon the Vale to refuse it.

Yours faithfully

Maggie Brown (Mrs) Clerk to Bourton Parish Council