



Highclere Parish Council response to the
Proposed Development at Common Farm by
Bewley Homes
(Ref 21/03394/OUT)

14th January 2022

Summary

Highclere Parish Council objects to this application for the reasons set out below. It should be noted that in reaching this conclusion, the Highclere Parish Council has been working collectively with East Woodhay 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.

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. It is also contrary to the emerging Basingstoke Local Plan.

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, the landscape and natural environment, its poor relationship with the existing community and its reliance on the car means that if permitted, it would result in development which was not sustainable. The proposed development would provide, at best, a limited contribution to the five year supply of housing land of the Borough. The benefit to the supply of housing that would arise would not outweigh the harm which has been identified.

A Neighbourhood Plan for Highclere is being prepared. In the initial public consultation, the residents of the parish have told us that it should place sustainability at the heart of the plan, and should conserve the natural setting of the parish and protect its wildlife habitats and corridors. This application does not achieve any of those aspirations.

1.Introduction

1.1 The purpose of this submission is to set out the response of the 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 Basingstoke and Deane Borough Council (BDBC) and further evidence provided by the applicant.

1.3 The application site is within Hampshire but adjoins the boundary with West Berkshire Council (WBC). 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 Water 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 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 proposed off-road shared pedestrian/cycleway would be located almost entirely within the WBC 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 Highclere village 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 in the Borough. However, 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 BDBC but will also refer to the relevant policies of 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 the 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. Furthermore, where there are relevant local development plan policies, or they are out of date, para 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 generates 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 majority of trips made by residents of the site 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 Highclere Parish is a very rural one with limited facilities available to residents of the proposed development. Those that it does have, are not easily accessed on foot or by cycle and the routes are via relatively narrow unlit rural lanes with no continuous footways. There is a very limited public transport linking the site to Highclere village which only offers four bus services a day (routes 7 and 7a).

Specific comments on the Full Application are:

4.6 The proposal for 90 dwellings would result in a development without any community or 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. 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 Hybrid 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 allocated under Policy SS3 and its location adjoining the River Enborne could have an impact on the water course. The application being proposed is 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. In the context of paragraph 11 of the NPPF, permission should be granted unless the harm of doing so outweighs the benefits of the development. In this case the benefit is in the addition to the housing land supply of the Borough. 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 is 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 within the parishes of Highclere and East Woodhay in Hampshire. The settlements within those two parishes are not included within the policy which have a specific housing allocation. They are part of a large group who are expected to contribute to a figure of 150 dwellings by identifying opportunities for at least 10 homes. Highclere was not required under Policy SS5 to provide any housing in the plan period.

4.15 BDBC as part of the review of the adopted Local Plan have published a report (See para 4.65 below). It has established an initial position and Highclere Parish has provisionally been allocated a figure of 10 dwellings.

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 comprises development which is not 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 to the applicant (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 homes 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 full 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.

Specific comments on the Full Application are:

4.20 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.

Furthermore, 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.

The Full Application is contrary to Policy CN3

Policy CN4 Housing for Older People/Specialist Housing

4.21 The policy supports the provision of housing specifically designed to meet the needs of older people or specialist accommodation subject to criteria i) meeting a proven need and ii) that the location is appropriate in terms of access to facilities services and public transport. The outline proposal 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

4.22 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.

4.23 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 as to what would 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, which will significantly impact the timescales and start times for any development.

The Outline Application is contrary to Policy CN6

The Full Application is contrary to Policy CN6

Policy CN7 Essential Facilities and Services

4.24 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.

4.25 The development is poorly related to Highclere Parish. There are limited services and facilities in Highclere Parish which residents of the proposed development could access and realistically would do so by car. Were the new facilities proposed in the outline application to be provided, existing residents of the parish would need to 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 village hall to it, resulting in a reduction in income.

4.26 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.

4.27 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.

4.28 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

4.29 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 criteria; e)-f) focus on the potential loss of existing facilities.

4.30 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. A consequence of the proposed provision on-site could be that the new community hall attracts users of existing facilities such that there would be a negative impact on their income which could undermine their operation.

4.31 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 times 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.

4.32 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

4.33 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.

4.34 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, making them unattractive for use by pedestrians and children. There is a limited bus service. It is most likely that virtually all journeys would be by car.

4.35 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 Highclere.

Specific comments on the Outline Application are:

4.36 The application includes a number of measures to encourage non-car modes of travel. However, there is a lack of detail and certainty regarding an improved bus service, such that it would provide a reasonable alternative to the car and would be delivered or that the proposed off-road shared route on the east side of Andover Road would be provided.

4.37 In 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:

4.38 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

4.39 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. Development which does not maintain the integrity of existing settlements will not be considered acceptable. The proposed development is located within the setting of the North Wessex AONB which the Parish Council considers would be harmed by its impact.

4.40 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).

4.41 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.

4.42 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 density, scale or form or physical connection. The applicants 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'.

The Outline Application would be contrary to Policy EM1

The Full Application would be contrary to Policy EM1

Policy EM4 Biodiversity, Geodiversity, Nature Conservation

4.43 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.

4.44 The site is of ecological value, in particular having regard to the policy is the 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

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

4.46 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 asset 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

4.47 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 a 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.

4.48 The location of a substantial development close to the River Enborne will increase the risk of pollution.

The Outline Application would be contrary to Policy EM6

The Full Application would be contrary to Policy EM6

Policy EM7 Managing Flood Risk

4.49 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.

4.50 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 by Mr Garrett, published on BDBC web site on 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.

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

4.52 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

4.53 The policy requires development to be of a high quality and sets out a number of criteria: 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.

4.54 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.

4.55 In all the surveys that have been carried out in Highclere, one of the aspects of its character most liked by the parishioners has been its rural or semi-rural nature. Residents want to live in a small village with modest housing development, in line with that being proposed by BDBC in its new Local Plan. The proposed development is in direct contrast.

4.56 The Parish is close to but distinctly separate from Newbury. The application site forms part of a rural buffer which is valued by residents. They also value the benefits of living in an area where light pollution is limited which adds to the area's countryside feel. Development at Common Farm would significantly erode that perception and appreciation.

The Outline Application would be contrary to Policy EM10

The Full Application would be contrary to Policy EM10

Policy EM12 Pollution

4.57 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.

4.58 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.

4.59 The applicants 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.

4.60 Given the lack of street lighting in Enborne Row and Wash Water, the introduction of a large residential area which would be lit to current standards, would have a detrimental impact on the character of the area and the quality of life of residents who value the dark sky environment. (See also para 4.56 above.) Furthermore, given the position of the site adjacent to the North Wessex Downs AONB, which has the 26th darkest sky out of 326 districts in England, due regard must be given to AONB guidance on light pollution and provision.

Basingstoke and Deane Local Plan Review Local Plan

4.61 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.

4.62 BDBC has considered how its emerging housing requirement should be met, given the 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 2021 meeting of the Economic, Planning and Housing Committee.)

4.63 The application site was submitted for inclusion in BDBC's SHELAA site (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.)

4.64 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.

4.65 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.)

4.66 Highclere is included within the category of small villages which have a limited range of facilities and relatively small populations. The proposed contribution that Highclere would make to the emerging housing requirement is 10 additional dwellings.

Highclere Neighbourhood Plan

4.67 A Neighbourhood Plan is being prepared which would include the eastern part of the site. It is at an early stage in the process and detailed policies have yet to be drafted. The initial informal consultation with the residents of the parish has highlighted a number of issues which will inform the content of the document. Including: placing sustainability at the heart of the plan, conserving the natural setting of the parish, protecting wildlife habitats and corridors. The proposed development is in conflict with the emerging Neighbourhood Plan.

East Woodhay Neighbourhood Plan

4.68 Highclere and East Woodhay Parish Councils work closely together and have been in liaison regarding the emerging East Woodhay Neighbourhood Plan, which has completed Regulation 14 consultation. A revised document will be submitted to BDBC under Regulation 16 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.

4.69 In terms of the policies in the Regulation 16 version, shortly to be submitted to BDBC, the proposed development is considered to be contrary to the following emerging Neighbourhood Plan 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

4.70 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 Mineral Resources, 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.

4.71 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

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 Water 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 in some locations, has 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, conserve the rural character of the landscape 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, the landscape and natural environment, its poor relationship with the existing community and its reliance on the car means that, if permitted, it would result in development which was not sustainable. The proposed development would provide, at best, a limited contribution to the five year supply of housing land of the Borough. The benefit to the supply of housing that would arise would not outweigh the harm which has been identified.