20th December 2023
Delivered by email

Ms Olivia Tresise
Wiltshire Council
Monkton Park
Chippenham
Wiltshire
SN15 1ER

Ref: ARKS3006

Dear Ms Tresise

SUBMISSION OF FORMAL OBJECTION TO PLANNING APPLICATION REF. PL/2023/08647 - LAND TO THE NORTH OF BOLINGBROKE ARMS, HOOK, WILTSHIRE

On behalf of our client Arkells Brewery, we are submitting this letter of objection in relation to the proposed development at land to the north of the Bolingbroke Arms, Hook, Wiltshire, SN4 8DZ. The proposed development is seeking permission for the following:

"Change of use of land for the creation of a 4 no. pitch Gypsy/Traveller site comprising 1 no. mobile home, 1 no. touring caravan, and 1 no. dayroom per pitch."

The remainder of this letter sets out our client's formal objection to the proposed development which does not accord with the adopted development plan for Wiltshire or the National Planning Policy Framework. The relevant adopted development plan document is the Wiltshire Core Strategy (2015). It is understood that the Council are preparing a Gypsy and Travellers DPD, however this has not been formally adopted and should not be given weight in the decision-making process of this application.

Sustainable Development

The site is located within the open countryside, some distance from any settlement. Hook is located some distance from the site and is identified as a '*small village'* in the Wiltshire adopted Core Strategy and is identified as a settlement that does not have a settlement boundary. Paragraph 4.16 of the strategy states that:

"Any existing settlement boundaries for Small Villages and other small settlements not identified in the settlement strategy will be removed, and there is a general presumption against development outside the defined limits of development of the Principal Settlements, Market Towns, Local Service Centres and Large Villages. However, some very modest development may be appropriate at Small Villages, to respond to local needs and to contribute to the vitality of rural communities."

It is not considered that the proposed development represents a positive contribution towards the vitality of the rural community.

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Core Policy 2 (Delivery Strategy) states that "*Small Villages have a low level of services and facilities, and few employment opportunities. Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities*."

Core Policy 47 (Meeting the needs of gypsies and travellers) states that proposals will be considered favourably where it is located in or near to existing settlements within reasonable distance of a range of local services and community facilities, in particular schools and essential health services.

It is not considered that the proposed development represents sustainable development due to its location outside of a defined settlement boundary in the open countryside. The site does not offer accessibility to sufficient amenities and services via sustainable modes of transport such as walking or cycling. The road is also a 60mph road that is not lit with no pedestrian footpath, and could be considered dangerous, particularly for cyclists and pedestrians on dark winter evenings. Therefore, those occupying the site would rely on the use of a private car in order to access local facilities which does not demonstrate sustainable development. The proposed development is not contributing towards housing need, or improving employment opportunities, services or facilities and it is considered that the proposal does not comply with Core Policy 2.

Previously Developed Land ('PDL')

The Framework at paragraph 85 of the Framework states that "*The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist."*

Core Policy 47 (Meeting the needs of gypsies and travellers) states that "*New development should be situated in sustainable locations, with preference generally given to previously developed land or a vacant or derelict site in need of renewal."*

The site is not previously developed land and is undeveloped greenfield land, located in the open countryside. No evidence has been submitted with the application to demonstrate that the applicant has considered the availability of previously developed land.

Highway Safety

The Framework states at paragraph 111 states that "*Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."*

Core Policy 47 (Meeting the needs of gypsies and travellers) states that proposals be considered favourably where they are served by a safe and convenient vehicular and pedestrian access and that the proposal should not result in significant hazard to other road users.

Core Policy 61 (Transport and New Development) states "*New development should be located and designed to reduce the need to travel particularly by private car, and to encourage the use of sustainable transport alternatives. As part of a required transport assessment, the following must be demonstrated:*

i. That consideration has been given to the needs of all transport users, where relevant, according to the following hierarchy:

a. Visually impaired and other disabled people

b. Pedestrians

c. Cyclists

d. Public transport

e. Goods vehicles

f. Powered two-wheelers

g. Private cars.

ii. That the proposal is capable of being served by safe access to the highway network."

There have been no access plans provided with the application which demonstrate that the site can provide safe vehicular access for both pedestrians and vehicles. Access into the site is taken off Greatfield Road which is a 60mph road with no footpath, and as such is not conducive to pedestrian use. We note that the access point is located on the outside edge of a long bend in the road, and we consider it is highly unlikely that the necessary highway visibility can be achieved.

Summary

As set above, out client wholly objects to the proposed development under planning application reference PL/2023/08647 and it is respectfully considered that that application should be refused as it does not represent appropriate or sustainable development, conflicting with local and national planning policy.

Yours sincerely

Emily Rickard
Planner

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