

Tuesday, 10 December 2024

Objection to Application PL/2024/09976

Site Address: Land off Southampton Road and Junction Road, Alderbury, Wiltshire

Description: Outline planning permission with all matters reserved apart from details of access from Southampton Road, for a residential development of up to 47 dwellings, along with associated public open space, landscaping and biodiversity enhancements and a car park to serve the community allotments

1. Introduction:

- 1.1. This objection letter relates to application PL/2024/09976, which is an outline planning application with all matters reserved apart from details of access from Southampton Road, for a residential development of up to 47 dwellings, along with associated public open space, landscaping and biodiversity enhancements and a car park to serve the community allotments at Land off Southampton Road and Junction Road, Alderbury, Wiltshire.
- 1.2. This objection has been submitted on behalf of concerned local residents.
- 1.3. The site sits within the open countryside, within the Special landscape Area.

2. Discussion of Scheme:

2.1. Principle of Development:

- 2.2. Para. 7 of the NPPF states that: "The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs."
- 2.3. Para. 8 of the NPPF states that economic objectives of sustainable development include: "to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure."

- 2.4. Core Policies 1 and 2 of the Core Strategy define the Local Plan's spatial strategy, which significantly limits the development of new homes in the countryside. Core Policy 2 specifies that development will not be permitted outside settlement boundaries unless other policies in the plan allow it, as outlined in paragraph 4.25. A review of paragraph 4.25 reveals that the proposed development does not meet any of the listed exceptions.
- 2.5. It is noted that the applicant has submitted appeal documentation alongside the application to legitimise the site; this appeal was decided prior to the adoption of the Wiltshire Housing Site Allocations Plan, which has been afforded significant weight since adoption.
- 2.6. The Applicant is actively relying on the 'tilted balance' to justify development at this site. However, for this to result in permission being granted, the requirement will remain for adverse impacts to be significantly and demonstrably outweighed by the benefits when considered against the NPPF taken as a whole. This is not the case here given that major housing development in this location is not sustainable and the proposals fail to resolve this.
- 2.7. The NPPF is categorical that the achievement of sustainable development is the purpose of the planning system. This relates to meeting the needs of the present without compromising the ability of future generations to meet their own needs. This will be achieved by ensuring that sufficient land of the right types is available in the right places; these are defined within the Site Allocations Plan.
- 2.8. The proposals to significantly extend Alderbury are not compatible with the key thread of strategic spatial planning to achieve environmental sustainability running throughout national and local planning policy.
- 2.9. Core Policy 10 requires that growth align with Core Policies 1 and 2, while Core Policies 60 and 61 emphasize the need to reduce car dependency and focus on the most accessible locations for development. Furthermore, saved Policy H4 of the North Wiltshire Local Plan permits new residential development in the countryside only in cases where it is essential for a rural worker or involves a replacement dwelling. Given the strict nature of saved Policy H4, and its misalignment with the more up-to-date Core Policies 1 and 2, the latter should be prioritised. Since the application site lies outside of any defined settlement boundary, within the open countryside, it conflicts with Core Policies 1, 2, and 10, as well as saved Policy H4, making it an inappropriate location for development.
- 2.10. **Design, Visual Amenity and Landscape:**
- 2.11. Paragraph 135 of the NPPF states that planning decisions should ensure that all developments will add to the overall quality of the area over the lifetime of the development, are visually attractive as a result of good architecture, layout and appropriate

and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, establish and maintain a strong sense of place using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development. Paragraph 139 of the NPPF goes on to state that development that is not well designed should be refused.

- 2.12. Planning Practice Guidance (PPG) states that achieving good design “is about creating places, buildings, or places that work well for everyone, look good, and will adapt to the needs of future generations.”
- 2.13. Core Policy 51 states that development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures. Proposals should be informed by and sympathetic to the distinctive character areas identified in the relevant Landscape Character Assessment(s) and any other relevant assessments and studies.
- 2.14. Development should pay special attention to the separate identity of settlements and the transition between man-made and natural landscapes at the urban fringe.
- 2.15. Core Policy 57 states that a high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality. Applications for new development must be accompanied by appropriate information to demonstrate how the proposal will make a positive contribution to the character of Wiltshire.
- 2.16. Core Policy 58 states that development should protect, conserve and where possible enhance the historic environment, including important landscapes.
- 2.17. The site sits within the Special Landscape Area, on a highly visible edge of the Alderbury, which is highly visible from nearby residential development. Saved Policy C6 outlines that proposals for development within the open countryside within the special landscape area should be sympathetic with the landscape in terms of siting and scale and should be subject to high standards of landscaping and design.
- 2.18. This is an outline application with matters such as layout, scale, to be determined at a later date; however, an indicative layout plan has been submitted alongside the application.

- 2.19. Firstly, it is considered that the proposal itself would result in landscape harm; the proposal site is currently an open, greenfield site, which adds to the open, semi-rural and verdant nature of the locality. The current open, undeveloped nature of this field provides a physical and visual separation between the northwest edge of built form to the south-east and west. The proposed development would diminish this separation between the homes, urbanising this open space resulting in harm to the wider landscape.
- 2.20. The provided documentation relating to the Landscape and Visual Impacts of the proposal does little to assuage these concerns; the LVIA found that there would be a slight to moderate adverse effect to residential properties to the east, which are high-sensitivity visual receptors. Furthermore, there would be a slight to moderate adverse impacts on users of the A36; after mitigation is considered, which could take years to mature, this would be reduced to minor adverse. As such, it is considered that the proposal would result in unacceptable negative landscape impacts, and as such, would not be acceptable.
- 2.21. There are also some more specific issues relating to the LVIA; Paragraph 5.2.8 of the LVIA discusses the view taken from Oakwood Grove; however the position of this view underplays the impact of the view of the proposal from the neighbouring houses. Furthermore, it is put forward as evidence that the “proposals are visible from the upper level of existing housing estate” but makes no comment as to whether the proposal would be visible from the lower levels of the neighbouring houses. The photographs provided within the appendix and a basic analysis of the relative height of the ground level of the proposed development in relation to the neighbouring houses clearly demonstrate that the proposal would be visible from the ground level of the neighbouring houses.
- 2.22. Table 13 shows that plots 48, 49 and 50 Oakwood Grove have a Sensitivity of “Medium to High”, yet Table 12 only shows the Sensitivity as being “Medium”. This inconsistency suggests the report’s authors are concerned that these plots should be higher than a “Medium” level of sensitivity. Para 5.4.2 evidences this, stating that “potential high sensitivity receptors are to the west, south and east are limited to potential first floor, filtered and seasonal views from residential properties to the West and south of the site and within the estate on Oakwood Grove in the village of Alderbury.”
- 2.23. Table 13 incorrectly states the overall impact on plots 48, 49 and 50 to be “Moderate - Adverse” (“not material in the planning decision-making process”), using Table 10 as the means by which this is derived. The scoring scheme within the LVIA clearly shows that a more appropriate impact would be “Moderate-Major” (“material in the planning decision-making process”) or “Major” (“very important in the planning decision-making

process”) on the basis that the Magnitude of Change is “Large” (as stated in Table 12) and the Sensitivity is either “Medium” (as stated in Table 12) or potentially “High” as stated in Table 13 and para 5.4.2. The recent photos from 48 and 50 Oakwood Grove (below) add to the weight of evidence in this regard.

- 2.24. Para 5.3.4 details the visual mitigation strategy but fails to include any meaningful mitigations in relation to the visual impacts identified for Oakwood Grove plots 47, 48, 49 and 50, the last three of which Table 12 shows to have ‘High’ and ‘Large’ impact scores for Residents. Table 13 confirms that the mitigation strategy within the LVIA offers no mitigation, even after 15 years.
- 2.25. The LVIA document specifically calls out 48, 49 and 50 Oakwood Grove, but fails to mention or assess 47 Oakwood Grove, which will have exactly the same issues and suffer the same impacts. Thus, the LVIA is not considered to be sufficiently complete and comprehensive.
- 2.26. Notwithstanding the above, in the indicative proposals, the housing has been positioned away from Southampton Road and Junction Road to minimise landscape and townscape impact. As a consequence, the development fails to actively integrate with the wider village, townscape, and community. In urban design terms, this creates an island estate which turns its back on the wider area. The attempts to minimise landscape and townscape impact by separating the development from site boundaries make walking from the site less convenient, less overlooked, less safe, and therefore less likely.
- 2.27. Many characteristics of the proposals are heavily reminiscent of 1980s and 1990s cul-de-sac estates and do not exhibit any lessons from this era of architecture and town planning. The proposals are far from best practice sustainable urban design and placemaking. The scheme fails to reflect objectives set out in national and local planning policy.
- 2.28. **Residential Amenity**
- 2.29. Paragraph 135 of the NPPF sets out six criteria against which planning decisions should meet to deliver well-designed places. This includes criteria (f), which requires development to “create places ... with a high standard of amenity for existing and future users.”
- 2.30. Planning Practice Guidance (PPG) states that achieving good design “is about creating places, buildings, or places that work well for everyone, look good, and will adapt to the needs of future generations.”

- 2.31. Core Policy 57 states that applications for new development must be accompanied by appropriate information to demonstrate how the proposal will make a positive contribution to the character of Wiltshire through having regard to the compatibility of adjoining buildings and uses, the impact on the amenities of existing occupants, and ensuring that appropriate levels of amenity are achievable within the development itself, including the consideration of privacy, overshadowing, vibration, and pollution (e.g. light intrusion, noise, smoke, fumes, effluent, waste or litter).
- 2.32. Though this is an outline application and the final layout has not yet been decided, there are significant concerns relating to the proposed quantum of development on the site, and the related need to build within close proximity of the boundaries of the dwellings nearby; as outlined within the photographs provided within Appendix 1, taken from 47, 48, 49 and 50 Oakwood Grove, it is exceedingly likely that future development of the site would result in significant amounts of overlooking, overshadowing, loss of light and overbearingness for nearby occupiers. The provided illustrative site plan would be considered to show this, with significant amounts of two-storey development sitting to the end of the rear gardens of the properties within close proximity of the garden boundaries of dwellings along Southampton Road and Junction Road, and to the rear of Nos. 47, 48, 49 and 50 Oakwood Grove.
- 2.33. **Biodiversity Net Gain:**
- 2.34. Paragraph 180 of the NPPF states that planning decisions should contribute to and enhance the natural and local environment by protecting and enhancing sites of biodiversity value (in a manner commensurate with their statutory status or identified quality in the development plan) and should provide net gains for biodiversity.
- 2.35. In England, BNG is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Developers must deliver a BNG of 10%. This means a development will result in more or better-quality natural habitat than there was before development. The submitted BNG matrix shows that there is BNG Targets have not been met, resulting in a 43% loss in habitat units. As such, the required trading rules are not met, and it is not considered that the proposal would be acceptable in terms of Biodiversity Net Gain.
- 2.36. As such, the proposal fails to comply with the relevant provisions of the NPPF, and as such, should be refused.
- 2.37. **Conclusion:**

- 2.38. The proposal would not be acceptable in principle due to its siting outside of the settlement boundary. It is considered that the proposal would have an urbanising impact on the landscape, leading to wider, and more generalised local visual amenity harms. Furthermore, it is considered that the site itself, due to the constraints in terms of shape and size, would lead to a contrived and poor layout and design. It is considered that the proposal would result in residential amenity harm, through overlooking, overbearingness, overshadowing and loss of outlook. Furthermore, the required BNG trading rules are not satisfied.
- 2.39. As such, the proposal fails to comply with the relevant Local and National Policies and should be refused.

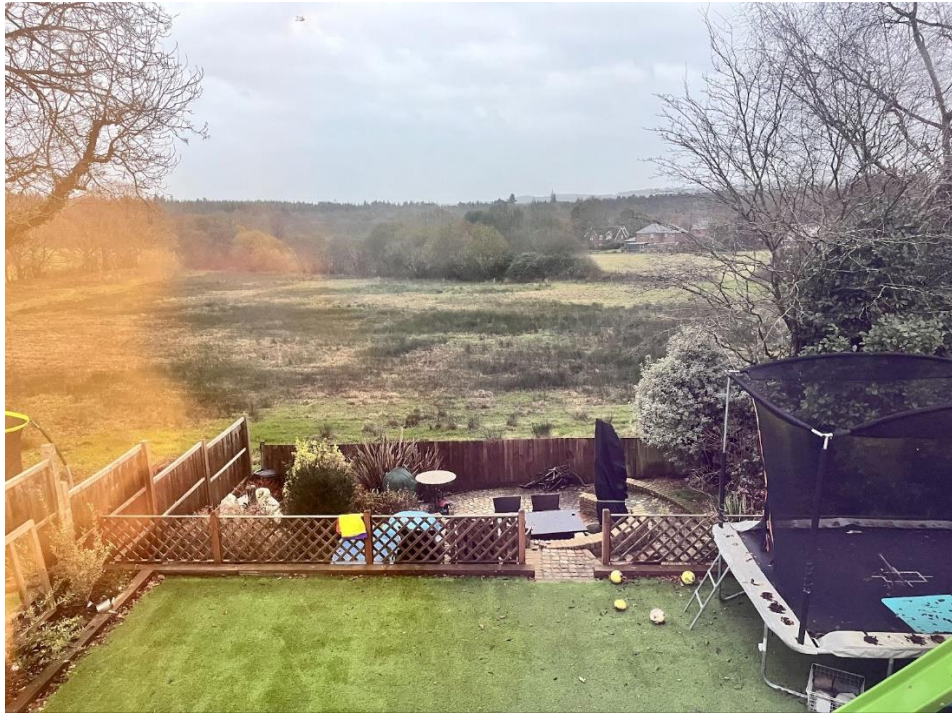
Appendix 1: Photographs from dwellings along Oakwood Grove



50 Oakwood Grove, first floor view (bedroom), 23/11/24



49 Oakwood Grove, first floor view (bedroom), 27/11/24



48 Oakwood Grove, first floor view, 24/11/24



47 Oakwood Grove, first floor view, 26/11/24



50 Oakwood Grove, ground floor view (sitting room), 23/11/24



50 Oakwood Grove, ground floor view (sitting room), 23/11/24



49 Oakwood Grove ground floor (garden/sitting room) 27/12/24



48 Oakwood Grove, ground floor view A, 24/11/24



48 Oakwood Grove, ground floor view B, 24/11/24



47 Oakwood Grove, ground floor view, 26/11/24