

**BLOCKLEY PARISH COUNCIL SUBMISSIONS ON
PARK ROAD PLANNING APPLICATION REF. 16/01925/OUT**

Blockley Parish Council strongly opposes the above application on the grounds outlined below. The Council urges CDC to give due weight and consideration to these representations and supporting evidence, and to refuse planning permission.

'Unsuitable – development would have adverse impact on conservation area and the AONB'

This quote refers to this site, known as BK1, land North West of Park Road.

Source – CDC Publication – Strategic Housing Land Availability Assessment and Strategic Economic Land Availability Assessment, March 2014

This view is eloquently and fully supported by Cotswolds Conservation Board in their submission to this application on the 3rd June.

HOUSING NUMBERS AND DEVELOPMENT STRATEGY.

Since early 2014 Blockley Parish Council have sought to fully involve our community to provide evidence to CDC to inform on the SHLAA process and the emerging Local Plan. In particular we have –

- Fully participated in the SHLAA process
- In March – April 2015 we carried out a parish-wide survey of parishioners' views regarding new housing development.
- Updated the Blockley Housing Needs Survey that formed part of the Parish Plan 2010, having repeated this survey in December 2014/ January 2015.

The evidence collected provides us with the information required to accurately present the community's views on this application.

SHLAA

This site was not included in the assessment having been rejected by CDC officers (March 2014) on the grounds of unsuitability for development. This view is supported by BPC and our community.

New Housing Development.

Our Parish wide survey in the spring of 2015 gives clear and statistically significant evidence of the community's view on future development.

The overriding preference is for small scale 'organic' growth over the Plan period – sites of 5 or fewer homes.

Marginally over 50% considered sites of 6 – 15 homes acceptable.

87% opposed sites of 16 – 25

93% opposed sites of more than 25.

This is clear and unambiguous evidence that the proposed development of 'up to 38' homes is totally unacceptable.

We urge CDC Officers and the Planning Committee to give full, due weight to this evidence.

Housing Need.

BPC has updated the Blockley Housing Needs Survey that formed part of the Parish Plan 2010, having repeated this survey in December 2014/ January 2015. The updated survey shows clearly:

- Only 19 households said they were in any type of housing need (13% of respondents). However, of those 19, 11 (58%) wished to move to a smaller property, and hence could not be described as being in urgent housing need. The remaining 8 households represent 5% of the 149 households that took part in the survey.
- 11 households currently owned their home outright, 3 rented from a Housing Association, and 2 from a private landlord. 2 had a mortgage on their home, and 1 respondent lived with a parent.
- 13 wished to buy on the open market, and 4 to rent from a Housing Association.
- Overall, the responses showed very limited housing need. Two groups emerged: 1. Elderly owner-occupiers (one person, or couples) who wished to downsize, and 2. Families with children who wanted larger accommodation.

The Parish Council is not aware of any comparable recent evidence of local housing need in Blockley, and would argue that district-wide statistics cannot and should not be used to justify local housing proposals.

We consider that there is a strong case to suggest that existing Planning Permissions are sufficient to meet this demonstrated need.

Total Housing Numbers.

CDC's proposals require Blockley village to provide 51 new homes in the plan period to 2031. Since April 2011 planning has been granted for 33 new homes.

Additionally two sites have been designated for development in the emerging Local Plan. CDC's figures for these sites would provide another 29 dwellings.

This would provide a total of 62 – 10 above requirement – in a plan period which still has 15 years to run.

The proposed application would add a further 38 to this number – a total of 100, to all intents and purposes virtually 100% above requirements.

There is no logical, numerical justification for granting this application. It should, therefore, be refused.

Development Boundary.

This application ‘does not accord with the provisions of the development plan in force in the area in which the application site is located’.

Additionally, it sits outside the proposed development boundary, recently drawn, for Blockley. Consequently, it does not accord with the emerging Local Plan. It should, therefore, be rejected.

Sustainability.

In previous submissions to CDC we have provided evidence to suggest that Blockley should not have been designated as sustainable.

Despite this it has been categorized as such.

Our opinion is that any measure of ‘sustainability’ is subjective and, of greater weight, finite. There are limits and constraints on what can be sensibly and realistically sustained.

We assume that within the context of the proposed Local Plan CDC consider that Blockley is able to sustain an additional 50 or so dwellings in the next 15 years.

Allowing this application would be a major breach of the proposed Policy and any sensible, considered growth of the village.

The ongoing nature and definition of ‘sustainable’ must be given serious consideration.

PLANNING POLICY.

The NPPF (Paragraph 115) requires weight to be given to conserving landscape and scenic beauty in Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The site lies within a designated AONB and the application if permitted would have a similar adverse effect on the character and appearance of the AONB as that proposed at Oddington Road Stow and dismissed by the Secretary of

State and his Inspector (Ref : APP/F1610/A/13/2203411) because the visual impact would be high, permanent and adverse. Similarly, here the setting of Blockley and one of the most prominent, iconic views of the village would be compromised and, in this respect, the proposals for 38 dwellings would not conserve the landscape nor scenic beauty of the AONB, contrary to the aims of the NPPF.

Paragraph 133 indicates planning consent should be refused unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. In terms of loss - the application site is adjacent to the Conservation area, listed buildings in Park Road and the Diamond Way footpath. It is visible from the nationally designated Heart of England Way and Monarch's Way. Planning permission for the application would compromise the setting of the village and its several heritage assets. There is no evidence to suggest that any 'substantial public benefit' would accrue over and above that provided for in the proposed Local Plan.

Paragraph 158 of the NPPF stresses the importance of using up-to-date and relevant evidence. In December 2014 the Blockley Parish Council updated the Blockley Housing Needs Survey carried out as part of the Parish Plan process. The survey was delivered to every household in Blockley village and Northwick Park: a total of 665. The results were published in February 2015 and showed that Blockley was not experiencing any form of housing supply problems and that no requirement of the scale, type or phasing proposed in the application was justified based on the survey of objectively assessed need carried out by the Parish Council.

In their submission the Applicants refer to The Cotswold District Local Plan (adopted 2006) as the principal development plan document for the site. They refer to –

Policy 4: Environmental Impact Development that is likely to significantly harm the natural or built environment, owing to its nature, size or location, will only be permitted if the benefits outweigh the environmental impact. This can be refuted as per Para 133 above.

Policy 7: Cotswolds Area of Outstanding Natural Beauty (NB: not saved by Secretary of State). In effect this considers arguments for allowing development within the AONB. Arguments against this as per Para 115 above.

Policy 19: Development Outside Development Boundaries

Outside Development Boundaries, and subject to Policy GB.1 and policies for site-specific allocations indicated on the Proposals Map and insets, development appropriate to a rural area will be permitted, provided that the proposal relates well to existing development; meets the criteria set out in other relevant policies in the Plan; and would not:

- (a) result in new-build open market housing other than that which would help to meet the social and economic needs of those living in rural areas;

The proposed site lies outside both 'existing' and proposed development boundaries. Under no circumstances could it be argued that the proposals 'relate well' to existing development.

It would result in new-build open market housing other than that which would help to meet the social and economic needs of those living in rural areas.
It should therefore be refused.

AREA OF OUTSTANDING NATURAL BEAUTY AND CONSERVATION AREA.

Crucially, the site lies within the AONB. The recent Stow appeal decision, recovered from the Secretary of State's determination (ref: APP/F1610/A/13/2203411) reinforces the importance of this designation. AONBs have the highest status of protection in relation to landscape and scenic beauty. The decision refers to para. 115 of NPPF, which states that great weight should be given to conserving landscape and scenic beauty within AONBs.

The Stow appeal decision and Secretary of State's conclusions are important not least because they conclude that the appellant's reliance on the earlier appeal decisions at Tetbury and Bourton was flawed. These decisions "relate to their own specific facts", and "gauging impact on the AONB is an inherently site specific process". "Simple harm" to the AONB is occasioned by the loss of green fields to residential development, but in addition, more in-depth analysis reveals "specific harm to the AONB caused by the impact of this development in this location on its landscape and scenic beauty."

Similarly CDC's document – Local Plan Reg 18. Consultation: Development Strategy (January 2015) – states in Section 7.3, Policy SP4

"New development should ensure the protection and enhancement of existing environmental and heritage assets (both designated and non-designated) and their settings."

It continues to say in 7.22

"... The level of importance of an asset and the significance of any feature that may be affected by a proposed development should be carefully considered and appropriate weight attributed to it. Even when development takes place without direct harm to the asset, it is important that the setting and potential wider area of influence is also protected. ..."

In this case we have a site proposed which is not only in the AONB but is also immediately adjacent to the Conservation Area. The proposed development would have a considerable negative impact to the unique setting of the terrace of cottages running the length of Park Road. These cottages are a distinctive and integral part of the Conservation Area.

The White Report (October 2014 states at Paragraph 7.17 in relation to Blockley "Areas where development is not considered to be suitable in accordance with the criteria set out in Section 2.0 are as follows: * Valley slopes adjacent to the Conservation Area both above and below which act as an essential setting to the village..."

This application is for a site which runs the length of Park Road on the valley slope immediately above the Conservation Area.

The scheme proposed would not 'ensure the protection and enhancement of existing environmental and heritage assets and their settings.'

On this basis alone this application should be rejected.

HIGHWAYS and TRAFFIC.

The proposed development is shown to be accessed from Park Road which runs along the eastern boundary of the proposed site.

At the southern end Park Road has junctions with Greenway Road and St George's Terrace. Blockley Primary School, St George's Hall and The Jubilee Hall are located at the southern end of Park Road. To the north Park Road is a country Lane connecting to Broad Campden.

The eastern side of Park Road is a significant feature of the Conservation Area. From the junction with St George's Terrace, heading north, is a virtually uninterrupted 'row' of Cotswold stone dwellings. In total there are in excess of 60 houses, the vast majority of them in terrace format. They front directly onto the footway – consequently the majority have no designated/dedicated parking – save for the highway.

This section of Park Road has an approximate average width of 5.5 meters. Hence, as soon as vehicles park on one side, usually the eastern side adjacent to the houses, the road effectively becomes a single carriageway wide. Passing and manoeuvring being facilitated by gaps between parked vehicles. Such useable gaps are difficult to find at busy times.

The 'Transport Statement' prepared by PTB for the applicant states at 3.4.3

'Observations during the School AM and PM peaks show that on-street parking increases slightly at the start and end of the school day. This is generally limited to just outside the school gates; however, the majority of parents park and wait in the St George's Hall car park which is located adjacent to the school. This minimises the amount of additional on-street parking during school dropoff/pick-up times.'

This differs from our own observed and anecdotal evidence. Frequently there are no 'on street' parking spaces free in the vicinity of the school. Parents utilize St George's Hall car park out of necessity. In it's own right this is frequently 'over full' and there are congestion problems as well as difficulties in gaining access to and egress from the car park.

To contemplate accessing a development for 38 dwellings from such a road does seem impracticable. The applicants own Stage 1 Road Safety Audit does recognise this and suggests – 'if necessary, parking restrictions should be provided in the immediate vicinity of the junction' – (of the site access with Park Road).

This begs the question – where do the 'displaced' vehicles go?

There are already times when there are issues with volumes of traffic and safety issues.

The PTB submission identifies 'peak times' and queue events in section 3.3.1 Table 1.

Again this differs from our own observations. In our opinion the peak times specific to this location are – morning 08.25 – 09.00, afternoon 15.00 – 15.30.

PTB indicate virtually no queuing traffic at the various junctions – Park Road/Greenway Rd/St George's Terrace/Station Rd.

In our experience it is not uncommon to find peak time traffic queuing at all these junctions and from Greenway Rd up to the entrance to the car park. Clearly this is not of M25 gridlock proportions but it should not be ignored just because it's in a small Cotswold village.

Further development along Park Road will result in increased traffic and congestion at peak times. It will introduce additional strain on existing highway infrastructure. To blithely suggest the introduction of 'parking restrictions' as part of a solution does not indicate an understanding of the issues.

COMMUNITY INVOLVEMENT.

The applicant has made no attempt to involve the community in discussing this application.

This is almost certainly because the site has a history. There have been numerous occasions over a number of years when proposals have been 'floated' for development of this site.

On every occasion there has been strong and significant opposition. The site has not featured in any of the recent Parish Council surveys – it having been ruled unsuitable for development by CDC. However, experience would indicate that the level of opposition would exceed that shown for the development on Draycott Road. In that case a significant survey indicated that 83% of Parishioners opposed the development.

Blockley Parish Council request that CDC gives due weight and consideration to the evidence and submissions above.

As a Planning Authority you have well in excess of your 5 year land supply, your Local Plan is now well advanced and carries more weight as it progresses. You are therefore, in a strong position to act within the confines of your own emerging policy and reject this application.

In the interests of our community, our environment and the future of our village we would urge you to do so.