

# SHIPLAKE PARISH COUNCIL

Clerk to the Council: R, V Hudson

Your Ref: APP/Q3115/A/14/2217931

Our Ref:

Date: 20/06/2014.

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20<sup>th</sup> June 2014

**Reference: APP/Q3115/A/14/2217931**

Dear Mr Kozak

**Planning Appeal: P13/S2184/O Proposal for 110 dwellings at Thames Farm, Shiplake**

Shiplake Parish represents the interest of some 640 households covering the villages of Lower Shiplake (540 households) and Shiplake Cross (100 households). The appeal site lies on the north west boundary of the village of Lower Shiplake, adjacent to the A4155 Reading Road.

We write in total support of South Oxfordshire District Council's decision to refuse planning permission for the above development at Thames Farm, Shiplake. Approval would represent an ad hoc, unsustainable development that is isolated from the community, which it proposes to serve. It is at odds with the strategic direction of future growth in the district, which is being planned through the Local Plan process by the district council, with community involvement.

We would like to reiterate our continued objection to the above planning application, which we understand is to be considered at public inquiry in December 2014.

Our position in relation to this planning application has not changed and we consider that:

- the adopted core strategy and associated Local Plan to 2031 continue to ensure that the five-year housing land supply is maintained;
- there is no strategic need for additional housing releases at this time, particularly on sites that do not fit with strategic objectives and do not offer any other benefits;
- the development is promoted to serve primarily the identified housing need of Henley, which has appropriate infrastructure to accommodate the scale of housing proposed and sufficient available sites on which it can be located;
- it is accepted that Lower Shiplake should accommodate its own generated housing need and potentially a proportion of the district requirement, although given the lack of available local infrastructure, the village has not been identified as a strategic location for new housing. Sites well related to the village exist to accept a level of development commensurate with local need, a level which is much lower than the scale of development proposed in this appeal;
- even if further housing were to be located at Lower Shiplake, the appeal site is on the wrong side of the A4155, remote from the rest of the village and provides limited opportunities to link easily and effectively with the existing settlement; the A4155 provides a strong barrier to growth to the west of the village, separating the built up area from open countryside;
- access arrangements, particularly pedestrian, are convoluted, inadequate and over-engineered in order to provide an access to and across a busy and dangerous main road - arrangements which in our local view are unsafe;
- the creation of the site access points requires the degradation of existing mature vegetation and the opening up of the site to urbanisation. This at a time when adequate alternative sites exist in the village that are better located and potentially available to accommodate development need without extending the village beyond clearly defined and defensible boundaries, and without detriment to local character;
- the appellant has not provided any clear justification why this site is suitable for development at this time and why the form of housing is appropriate. The case mounted relies primarily on the pretext that there is an inadequate housing land supply and therefore this site should be developed because the landowner is making it available;
- there is no robust case promoted to demonstrate that this site is an appropriate location for new housing, that there is appropriate infrastructure to support it, that it is of a scale and form that is needed, and its release would be beneficial compared with the alternatives being promoted through the development plan process;
- this is an opportunist proposal to promote a site that is unlikely to feature in any development plan for the foreseeable future because of its planning credentials; it is promoted simply because of a claimed (but mistaken) shortage in housing supply, seeking to take advantage of the Government's push for housing growth.

As the Parish Council for the settlement to which this development adjoins (the site is located on the Lower Shiplake/Harpsden Parish border), we have followed this planning application since its inception and know the site and its planning history extremely well. Despite the thin smoke-screen of "planning justification" presented, we have no doubt that the applicant is promoting the application purely and unequivocally to raise finance for the landowner and without any philanthropic gesture towards meeting an acknowledged local need. Whilst we accept that this is not a planning matter per se and a landowner is free to promote land at any time, it would be wholly wrong to allow this inappropriate and poorly planned development to proceed for reason of a technicality and limited planning benefit. The landowner is well aware that if the future of South Oxfordshire is to be planned effectively and sustainably, this is not a site that would be chosen at this time. There are many sites that are better related to existing settlements and in more sustainable locations to meet the defined need, and this is a matter that is being addressed appropriately and efficiently through the review of the core strategy.

The application has clearly been submitted in response to the Government's drive for growth, on the claim that the district does not have sufficient housing and the false premise that any housing will be granted at appeal. This is evident having read the appellant's appeal statement, which relies almost entirely on an argument of housing land supply and provides very little evidence in support of site suitability; the statement provides some 30 pages of text relating to housing land supply, but only five paragraphs addressing trees and one short paragraph addressing highway and safety considerations. There is no explanation of site constraints and opportunities, or any guarantee of the style, form and content of appropriate housing at the site. The application was woefully short on any detail that provided comfort that the site could indeed be developed in an acceptable and sustainable manner, that it would integrate effectively with the nearby settlement of Lower Shiplake to become part of the local community, and could overcome serious local concerns over the safety of the A4155.

This lack of detail is a significant omission in our view, given the location and character of the site. It demonstrates a lack of understanding of the importance of sustainable planning, of addressing planning issues appropriately and addressing the legitimate concerns of the local community. Even if the housing land supply argument is defensible (and we are very doubtful as to whether this is a robust argument given the district's housing land supply figures published in April 2013 and which are being reviewed), the appellant does not seem to be able to prove that the site is suitable above all others for housing.

Having established that given the adequate supply of housing there is no current strategic need for this development, we also suggest that development on this site is inappropriate and for that reason does not have support within local planning policy. The Core Strategy was adopted in 2012 and the district is now quickly rolling forward with its Local Plan to 2031. The district has recently produced its Local Plan 2031 Issues and Scope document for public consultation. The document sets out a number of options for accommodating

revised housing numbers, over and above those set out in the Core Strategy. Of all the five options proffered for opinion, only Option E, "Dispersal" provides opportunity for development anywhere other than the towns and larger villages (of which Lower Shiplake is not one) that were identified in the Core Strategy as being suitable locations for housing allocations. Even if, in the unlikely event that this option is the preferred approach, (unlikely because of the requirement to ensure new development to be sustainable), development in this location would be limited to infill development, and it is extremely unlikely that the scale of the proposals outlined in this application at Thames Farm will fulfil that criteria.

The Strategic Housing Land Availability Assessment 2013 does not include an assessment of potential at Lower Shiplake, as the village is regarded as a smaller settlement. The SHLAA states "*it was considered unlikely that the smaller settlements would be suitable locations for sites of 10 or more dwellings*" (SHLAA; 2013; 8).

In accord with the Government's drive to make planning more accountable locally, Harpsden Parish in conjunction with Henley is producing a neighbourhood plan. The appeal site falls on the outer edge of the area covered by the plan, which is currently at consultation stage, to be concluded at the end of June 2014. As part of the preparation of the plan, an independent assessment was carried out to identify sites for development and to meet the identified strategic need. Land at Thames Farm, in common with many greenfield sites that are not physically incapable of being built upon, was identified as being capable of accommodating housing if local planning considerations could be met and any technical issues overcome. However it was omitted in the draft neighbourhood plan document as a potential housing site as others, in and adjoining Henley, were regarded as more favourable and sustainable in sound planning terms.

Therefore, with the core strategy requirement being accommodated on available sites and with other identified sites being suitable for picking up any further housing requirement as the development plan is rolled forward, there is no strategic need for the development of this site; nor is there any existing or foreseeable future policy framework in which this development option might come forward. In the unlikely event that housing were allocated at Lower Shiplake, and we appreciate that in the longer term some controlled growth may be appropriate, there exist alternative, more suitable sites within the village that could potentially accommodate housing development, subject to the usual planning policy framework. We therefore turn to our main argument, which is that we consider the site itself to be an inappropriate housing location, given its relationship with the village of Lower Shiplake, the needs of the village and future occupants of the proposed housing.

### Traffic and Safety Issues

As already mentioned, in the Statement of Case the appellant addresses the road and access issues associated with development at Thames Farm in one short paragraph. This is simply not acceptable, given the significant issues that are raised as a result of this application and the access proposals. The site is located to the west of the A4155, a busy

route between Reading, Henley and Marlow, which effectively acts as a bypass to the village. The road represents the western limit of the settlement with all but some sporadic development to the west of the route. The focus of the village is away from the road towards the station, pub and corner shop that occupy the centre of the village, at some distance from this proposed site.

The A4155 Reading Road has a 30mph speed limit along the site's boundary, yet it exhibits the rural character of a road with a national speed limit of 60mph. Traffic is prone to speeding along its length and the presence of a sudden and sharp bend and hidden dips does nothing to improve its safety. The road is a known accident blackspot, it is difficult to cross due to traffic speed and volume and visibility, and there has been a fatality in recent years. For these reasons the Parish Council recently instigated the installation of a VAS sign to attempt to mitigate the dangers on this stretch of the road. We are concerned that although an access solution is promoted that meets the technical requirements for a road limited to 30m.p.h, it does not take into account the true elements of this road. The design solution is convoluted, especially in terms of pedestrian crossing, meaning that desire lines are avoided and raising the risk that people will cross in locations that are unsafe.

Given the road's issues in terms of traffic speeds and safety, and the barrier the road creates between the village and the countryside to the west, the site at Thames Farm is wholly unsuitable for development.

#### Pedestrian Access to the Village Centre

The development proposes to link to the village via a footpath along the western edge of the road, with a crossing point near the bend at the War Memorial and across the A4155/Woodland Road/Station Road junction. This walk would be unpleasant and difficult to negotiate, particularly at the busy three-way junction. An alternative route is provided to the north but this is circuitous to say the least. A traffic island located to the east of the main site entrance would assist pedestrians in crossing the road, but once pedestrians have negotiated this busy carriageway they are then required to walk north (away from the village) in order to link with an existing narrow footpath which traverses open fields before again entering the village via Northfield Avenue. Street lighting in this location and along this route, as suggested by the applicant, would be an incongruous and unacceptable intrusion given the rural nature of this existing link. Both routes are considered by local residents to be unsafe for pedestrians, particularly children, young mothers with pushchairs etc. and the elderly.

Using these links, the majority of the site is at best a 15-20 minute walk from the village centre (station) and we argue that in this day and age residents are more likely to drive than try to negotiate the convoluted footpaths provided. Local services offered are limited in the village and most occupants of the proposed development are more likely to travel the short distance to Henley. The bus service is extremely limited, operating only on an hourly basis. Roads within the village itself are narrow with little provision for

parking and the station car park at Lower Shiplake, used by commuters, is well known for being full by 0730 until 1830 in the evening. Conversely, Henley has ample parking and its station has a large car park with available space. Given that the majority of occupants of this development are likely to be commuters or work in Henley and use the facilities there rather than walk to Lower Shiplake, and that the housing is required to serve the needs of Henley - this site does not appear to represent a sustainable planning solution.

### Landscape and Vegetation

As already mentioned, the A4155 here is rural in character. In order that the access to and from the development is safe for vehicles and other road users, visibility splays need to be longer than those that would be usually required in a 30mph zone. This means that a significant number of trees, many of which are protected by Tree Preservation Orders, will need to be removed. Although the applicant offers to plant new trees behind the visibility splays, this does not justify the desecration of the existing vegetation. We argue that since there is no need for housing in this area, there is no need to remove the trees.

### Character and Coalescence

The busy and noisy environment of the A4155 means that the character of the open areas surrounding the village vary, depending on which side of the road they lie. Whilst some housing development may be appropriate on the land to the east of the road, the site to the west feels more remote, rural and detached from the village. Although there is some sporadic housing along Woodlands Road, this is low density in character and unlikely to be increased in density or number due to restrictive planning policies. If the site at Thames Farm were to be developed, additional pressure would be brought to bear on land further north and south along the A4155, for which it would consequently be difficult to raise objection in principle. Ultimately there would be a real threat of the loss of the individual identity of Lower Shiplake and coalescence with Henley. If Lower Shiplake is to accommodate further growth this can be accommodated to the east of the A4155 without the threat of coalescence. The A4155 road provides a robust and defensible boundary to the village, and this development limit should be maintained.

There are other sites on the east side of the road adjoining the village, which could be considered in preference. These have, so far, been kept from development due to existing planning restrictions limiting development outside the larger villages. However should, in the longer term, the village be required to accommodate additional housing, these sites should take precedence.

### Pressure on Local School

It is widely understood that the housing provided at this site will address the housing needs of Henley rather than Shiplake, and the proposed housing will contain a significant amount of family housing which will place additional pressure on the existing primary school, which is already at capacity and continually over-subscribed.

Furthermore the site is, as the crow flies, closer to the school than many properties already within the catchment area, and this will result in residents from the new development taking priority over existing families, which is a totally unacceptable position. The solution of transporting children by bus from the site to schools in Henley from a development that should be located within that town is ludicrous, unsustainable, and again reinforces our argument that it is Henley that should have the new housing in the first place, not Shiplake.

In summary, we believe that in the interests of sound and sustainable strategic planning for the future needs of South Oxfordshire, this site is poorly located and there are many better and available alternatives that balance the economic, social and environmental considerations required by the NPPF. At a local level this site is not suitable for housing development because of the significant issues of transport, access and pedestrian safety, poor integration and links with the existing village, loss of mature trees, degradation of rural character and the threat of future coalescence with Henley.

Should additional housing be required in the Henley area, this should be directed in the first instance to Henley, where there is evidence of local need, available supporting infrastructure and well located and suitable development sites. We question why Shiplake should be required to accommodate development for Henley when the local village infrastructure, particularly parking and the school, is already stretched and unable to cope with any increased demand, and the site promoted is poorly related to the village.

If, after further review, Lower Shiplake is required to provide additional housing in the longer term, there exist a number sites in the village that are considerably better placed to accommodate development in terms of their location, links with existing facilities and ability to create a sustainable new neighbourhood for the village.

We would be happy to provide additional information on any of the issues raised above, and would welcome the opportunity to discuss this matter with you further at the Appeal.

Yours Sincerely

*pp RV Hudson*

Councillor Tudor Taylor  
Chairman Shiplake Parish Council

