Hannah Wiseman

Vale of White Horse Planning

135Eastern Avenue

Milton Park

Abingdon

Oxfordshire OX14 4SB

23 March 2020

Dear Ms Wiseman

**Re: P20/V0629/FUL Change of use of land from employment to residential, construction of four two-bedroom and one three-bedroom dwellings with associated access, parking and manoeuvring area, refuse and recycling storage, culverting of ditch and associated landscaping works**

Watchfield Parish Council **STRONGLY OBJECTS** to this application on the grounds of the following material considerations:-

1. Contravention of multiple elements within the Statutory Development Plan: Vale of White Horse Local Plan 2031 Part 1 (LLP)
2. Planning history of the site
3. Amenity considerations of the character of the area, and loss of trees
4. Traffic generation, parking and highway safety
5. Poor design
6. Viability
7. **Contravention of the Statutory Development Plan: Vale of White Horse Local Plan 2031 Part 1 (LLP)**
   1. Saved Policy E11 of the adopted Local Plan 2011 identifies the Shrivenham Hundred Business Park as a Rural Multi-User Site in which the loss of existing business land and premises to other uses would not be supported, other than to ancillary uses referred to under Saved Policy E13. We argue that Core Policy 29 should apply as planning permission was granted in February 2017 for the development of two commercial buildings (P16/V3246/FUL) which the applicants contended were necessary to meet a high demand for business units on the business park. Core Policy 29 (Change of Use of Existing Employment Land and Premises) states that applications for the change of use of land or premises that are currently, or were last, used for employment purposes will need to demonstrate that at least one of the following criteria is met:
      1. There is no reasonable prospect of the land or premises being used for

employment purposes. **The applicant has provided a financial viability assessment which does not chime with a parallel application for another business unit on site (see 2). If “No commercial development at this site is viable” why the application for another commercial unit? Also, the park has 68 existing businesses on site.**

1.1.2The land or premises is unsuitable for business use on grounds of amenity,

environmental or highway safety issues. **Clearly not applicable at the Shrivenham Hundred Business Park is well established business location providing employment**

1.1.3 The land or premises has no long term or strategic requirement to remain in

employment use, or **Clearly the Shrivenham Hundred Business Park is a going concern with 68 business currently listed on their website,** [**www.shrivenham100.com/occupier-directory**](http://www.shrivenham100.com/occupier-directory)

1.1.4 The proposed use will be ancillary to the use of the land or premises for

employment purposes. **This is not the case**

Therefore, NONE of the required criteria for change of use from employment have been satisfied.

1.2 The Vale District Council’s Economic Development Team were consulted during the pre-application enquiry and identified a lack of available, good quality and affordable workspaces in the district. This is particularly vital due to the massive expansion in housing in the local area. Watchfield has expanded its civilian housing stock by 87% in recent years and neighbouring Shrivenham has many hundreds of houses in the pipeline. The Shrivenham Hundred Business Park is the only site of a decent size for small businesses in the area. The Vale is supposed to promote sustainable development which cannot happen if there is no local employment or employment areas in the vicinity of the new housing.

1.3 Also see contraventions of Core Policy 37 under **3** below.

1. **Planning history of the site**

2.1 The applicant also has an application currently under consideration for a new commercial building on the same site to facilitate one business unit (P20/V0497/FUL). The financial Viability Assessment supplied with P20/V0629/FUL suggests one of the applications is disingenuous.

2.2 Planning permission was granted in February 2017 for the development of two commercial buildings (P16/V3246/FUL) which the applicants contended were necessary to meet a high demand for business units on the business park.

1. **Amenity considerations of the character of the area, and loss of trees**

3.1 The site is currently a parcel of open space that positively contributes to the character of the business park.

3.2 The siting and orientation of the proposed new dwellings are not in keeping the surrounding area. The residential envelope of the village does not extend to the eastern side of Majors Road where all development is retail, employment or religious, comprising the Shrivenham Hundred Business Park, Kingdom Hall, Co-Operative Foods outlet, Subway, Watchfield Optician, Hairdresser and College Farm public house. The proposed development would be directly opposite Watchfield Recreation Ground on a spur of Majors Road. There are no residential houses on this section of Majors Road at all. As such, it is considered that the proposal would not respond appropriately to the existing layout of residential buildings and spaces in this part of the village and would therefore be contrary to Core Policy 37 of the adopted Local Plan 2031 part 1. Furthermore, the proposed design does not fit with the existing commercial developments on site.

3.3Contravention ofCore Policy 37: Design and Local Distinctiveness.

3.3.1 The design quality is particularly poor with no local references to the design of the civilian portion of Watchfield with which it most geographically aligned, nor does it sit appropriately amongst the commercial buildings on the business park. It is not visually attractive and the density, massing, type, details and materials are not appropriate for the surrounding area.

3.3.2 It will not visually integrate with its surroundings. Biodiversity will not be enhanced as there will be removal of some trees to create the access road and other trees, meant for retention. For the pre-application advice the Vale’s Forestry Officer offered the following comments: The proposed application is on a site for which planning permission was granted in February 2017 for the development of two commercial buildings (P16/V3246/FUL). Prior to that the site contained a significant number of trees that formed part of the comprehensive landscape scheme required as a condition for the original development of the business park in 1985. Over 40 trees were removed and the applicants contended at the time that the proposed commercial units were necessary to meet a high demand for business units on the business park. The proposed development will require the creation of a new access, through the boundary vegetation, and a replacement footpath link that will affect the mature Birch to the eastern end of the block. Although no trees are directly within the footprint of the development, the consequential excavation for the foundations, road and footpath is likely to adversely affect the health of many of the remaining trees. Unlike a development for business use, tree planting within the available space for landscape mitigation will conflict with the intended use because the private gardens have insufficient room to support trees without diminishing the useable garden space. Rather than a communal area with planted trees, the residential development could only support a linear boundary treatment of tree planting that will do very little in terms of landscape screening for the business park as a whole.

Therefore, the development is likely to provide an overall decrease in biodiversity and a decrease in the screening from the existing trees. If other, road-facing developments are an indicator, hedge line trees are quickly removed by new residents with no consequences from the planning authority.

* + 1. The development does not provide a sufficient level of car parking for the number of houses. The number and size of resident and visitor parking appear inadequate.

**4. Traffic generation, parking and highway safety**

4.1 Drawing 16146-OA-B1-011-P-RP does not show the entrance to Watchfield Recreation Ground opposite, nor the junction and island at the High Street end to the west nor the narrow chicane at the east end split of Majors Road. These are important as they affects the safety of the proposed access road and pedestrian entrance and the flow of traffic. The recreation ground is in use all day and into the evening and the visibility splays across to the recreation ground entrance should also be taken into consideration together with the sight lines from the two other junctions.

4.2 The road layout within the development has been reduced and waste provision now seems to consist of the residents bringing their bins to the roadside of Majors Road as the response from the Vale Waste Team states they would not collect from an on-site bin store if residents have individual bins. The Design and Access statement for waste collection does not comply with the response from the Vale’s Waste Team. There is no pavement on the development side of Majors Road or space for bins awaiting collection without leaving the refuse bins on the main highway. There is a very narrow verge (less than a bin width) and drainage ditch. There seems inadequate space on the development for emergency vehicle access. Similarly, larger delivery and service vehicles will either have to park on Majors Road, causing safety issues and difficulty for buses, or would need to reverse out of the development onto a bus route and road used by young families visiting the Recreation Ground, especially if parking is allowed along this road.

4.3 Currently, there are no parking restrictions on Majors Road but the fronting of the properties onto Majors Road will encourage lazy resident and visitor parking on the highway. This has already happened on a development further east causing serious traffic issues. If permission were to be granted there would need to be a TRO restricting parking along this section. Majors Road is a main bus route for the Stagecoach S6 service five times a day in both directions. The highway is only 5.5m wide in front of the development site. The S6 bus is approximately 2.4m wide and so can only just pass each other on this stretch without on street parking. Unrestricted parking on one side of the highway during a village function several years ago lead to buses being delayed for over an hour until cars were moved. Vehicles have very little manoeuvre room due to the drainage ditch. Parking on the highway will force vehicles onto the other side of the road restricting visibility from the other junctions, proposed development access road and pedestrian entrance and the Recreation Ground entrance.

4.4 There is no proposal for a pedestrian walkway from the development site meaning pedestrians will need to immediately cross Majors Road which will be made dangerous by on street parking.

4.5 The Recreation Ground car park opposite the development is for Recreation Ground users only and is locked at dusk. Watchfield Parish Council would take steps to remove vehicles parked for other purposes.

1. **Poor Design**
   1. A stand-alone terrace of 5 houses on a commercial estate will stick out like a sore thumb. Contrary to the Design and Access Statement, there are no houses opposite, only Watchfield Recreation Ground.
   2. The design quality is particularly poor with no local references to the design of the civilian portion of Watchfield and local vernacular with which it most geographically aligned, nor does it sit appropriately amongst the commercial buildings on the business park. It is not visually attractive and the density, massing, type, details and materials are not appropriate for the surrounding area.
2. **Viability**
   1. If the applicants provided a Financial Viability Statement to support their assertion that no commercial development on this site was viable, why have they not produced a Viability Statement in favour of residential development? How have they demonstrated the housing need in this area? There are many hundreds of houses for sale within a 3-mile radius, many of which have been on the market for a great deal of time so there appears no immediate demand.

For all the above reasons, Watchfield Parish Council urges rejection of this inappropriate development.

Thank you for consideration in this matter.

Kind regards

Claire Arnold

Clerk to Watchfield Parish Council