FROYLE PARISH COUNCIL

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Response to EHDC Draft Local Plan Consultation Large Development Site Consultation

Froyle Parish Council has reviewed the Large Development Sites Consultation Document and wishes to make the following comments regarding the consultation

We welcome the additional consultation period regarding the large site developments proposed in the Draft Local Plan but contend that the effect of introducing of eight additional sites into the process at this stage whilst correct, has served only to set community against community and to distort the consultation process. EHDC Councillors have actively encouraged residents to object to sites in their own areas and instead to positively support the "preferred sites" of Whitehill and Borden and Northbrook Park. The consultation can therefore no longer be relied on to produce unbiased comments.

We are unclear if Northbrook and Bordon remain "preferred" sites in the context of this second consultation and if they are, we do not understand the process by which they were selected. We are not in a position to comment on the suitability of the additional sites that have now been introduced but would make the following comments on the proposed development at Northbrook Park.

Infrastructure

Larger scale development should be supported by the necessary infrastructure and facilities (NPPF). This criterion has simply not been satisfied in the case of the proposal for Northbrook Park. Specifically, the following questions have not been answered in sufficient detail:

Traffic management on A31. Traffic flow on the road is already subject to delay and disruption particularly at peak travel times going into Farnham or beyond to Guildford. As we are currently seeing with roadworks around Farnham any disruption to the flow of traffic quickly translates into lengthy hold ups. No work has been presented to demonstrate how the traffic arising from the creation of a new settlement of a minimum of 800 houses will be accommodated in a way that still allows residents to move around in a reasonable timeframe. The fact that the A31 is single carriage way for some distance both before and after Northbrook adds to our concerns that the road will simply be unable to cope with the increase implied by a minimum of 800 additional homes.

There is an assumption that commuter traffic will travel from Farnham or Bentley stations. Anyone commuting to Farnham will be unable to reach the station without either driving through the town (exiting the A31 at the Coxbridge roundabout) or all the way to the Shepherd and Flock roundabout and doubling back. Even at today's traffic levels both of these journeys can take at least 30 minutes and with development in Farnham and new commuters this will only get worse. Creating a new site which requires residents to allow 45 minutes or more to travel 4 miles is not sustainable. There is no parking at Bentley and the appetite of commuters to use the proposed bus service is very unclear as is the timetable it will run to.

No detailed studies have been presented to show the impact of additional traffic on the narrow country lanes running north of the proposed development. Some of these roads have already been impacted by additional traffic from the ongoing development in Bordon and this will only be further exacerbated by a new large site development. Most cannot be widened and often run through conservation areas therefore even if widening were possible that in itself would to the detriment of the local environment. Many of the roads are the only routes that cyclists and pedestrians have available to them.

Local infrastructure is already under pressure and cannot cope with further large-scale development. The developers' proposal simply does not adequately address the provision of health care services, in particular GP provision, where the suggestion is that a service might be provided for a few days a week in the village hall. We know that the Care Quality Commission (CQC) is unlikely to approve ad hoc measures like this as they closed the surgery that was held in Froyle Village Hall because the facilities were felt to be inadequate particularly in respect of patient privacy.

Duty to Cooperate

The proposed development at Northbrook Park imposes a clear duty to cooperate with adjoining authorities and is undeliverable without their active support. Currently the site is being promoted with no evidence of support from Waverley who will be heavily impacted by the proposed development and responsible for delivery of much of the infrastructure.

The lack of evidence of support from Waverley becomes even more important when one refers back to the Sustainability Appraisal Report produced in December 2018 assessing the Northbrook site, which states that "a preferred option would involve a larger scheme also taking in adjoining land to the east (within Waverley).

Evidence of common ground between EHDC and Waverley should be published now alongside the consultation, not later, to allow proper judgement of the proposal.

Landscape

We refer to the conclusions of the EHDC Landscape Capacity Study 2018 (areas 4b 1and 2) which concludes that the North Wey Valley between Alton and the district boundary is highly sensitive in terms of landscape and settlement patterns and that most forms of development should be avoided to protect its key features : the rural unsettled character, river meadows, valley sides, ancient woodlands, narrow rural lanes, historic medieval villages on the valley side, parkland, ecological richness, a sense of peace and tranquility etc.

The area is within the setting of the South Downs National Park (SDNP) and the proposed development at Northbrook Park would impact this negatively. The long-distance footpath, St Swithuns Way, and other footpaths pass close to the area and the proposed development would create visual harm. Historic buildings and their parkland setting at Northbrook Park would also be negatively impacted.

Building to the south of the A31 will detrimentally impact the setting of the River Wey and the historic water meadows and will be visually intrusive to those travelling on the A31 or the railway.

We anticipate that there will be pressure to increase the size of the development to something more closely approximating to the minimum of 1500 houses needed for viability – see comment in Sustainability Study above. See also Garden Villages by Taylor and Walker, Policy Exchange 2015 and Understanding Garden Villages Town and Country Planning association 2018. From the information given at public meetings by Mr. David Jobbins it is clear that the development is

being promoted on Garden Village principles but if that is what is being proposed then it should be clear from the start that sufficient land is available to achieve the minimum of 1500 houses and community facilities needed to achieve a sustainable development . It also should be clear that the master plan allows for these to be provided early in the build. If the site is being promoted as being developed with Garden village principles it should have all the elements of a Garden village as understood by the TCPA and not end up as a bland housing estate isolated from facilities and totally dependent on car journeys to satisfy the majority of residents needs

The Northbrook proposal fails to respect either the landscape or the historic settlement patterns. It is impossible to see how a new settlement of this size can possibly be accommodated in such a sensitive environment - let alone the impact of a 10 to 15 year build programme.

The North Wey Valley has long been valued for its landscape which remarkably has survived almost untouched by modern intrusions. As you travel from London to Winchester it provides a rural transition from the Surrey Hills to the South Downs. It is where the real countryside begins. To propose development in this area merely because the land is available does not stand up to scrutiny particularly when there are so many red lights associated with the site.

The Landscape Study supports our view concluding that the area has a low capacity for development because it is “constrained by its strong rural character and its role as an integral part of the Wey Valley landscape and rural setting of Alton, Holybourne, the Froyles and Bentley and their conservation areas”

Conclusion

We have not remade all of the points that we previously made in our response to the first draft consultation, but they all remain matters of grave concern which we believe, added to the points above mean that the proposal for Northbrook Park is the wrong development in the wrong place.