

PIRTON PARISH COUNCIL

Response of Pirton Parish Council to NHDC Local Plan Preferred Options

2011 - 2031

Stephen Smith, Parish Clerk January 2015

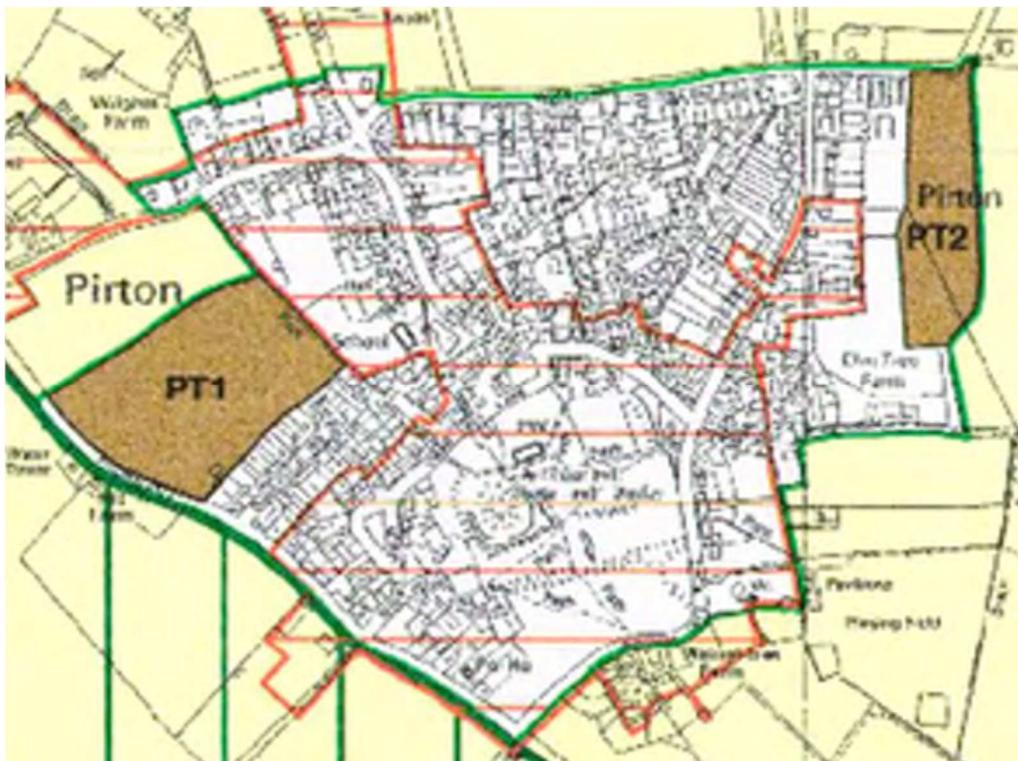


Parish Councillors	
Mrs Diane Bailey (Vice-Chair)	Mr John Hayes
Mrs Leila Lauder	Mr Rodney Marshall
Mrs Carol-Anne McConnellogue	Mr David Saunders
Mr Alan Scott	Mrs Pamela Waters (Chair)

1. INTRODUCTION

This document sets out the response of Pirton Parish Council to the Preferred Options of the North Hertfordshire District Council Local Plan 2011-2031. The document has been prepared for submission to NHDC as part of its consultation process, by the submission deadline of February 6th 2015.

Proposed sites and Extended Boundary



2. SUMMARY – RESPONSE TO LOCAL PLAN

Pirton Parish Council has three main objections to the Local Plan Preferred Options:

1. **Scale:** The Parish Council has always supported proportionate and sympathetic development, in accordance with the Village Design Statement, originally produced in 2003. However, the Parish Council objects to the proposed building of 142 new homes in the village during the lifetime of the Plan, i.e. in the next 16 years:
 - i. We believe the scale of the development is unreasonable and will cause irreparable damage to the fabric of village life and to the health of the community. We believe the number of houses proposed is in direct contradiction to the overarching principle of the National Planning Policy Framework (NPPF) for sustainable development and if built within the timeframes proposed is not sustainable and would lead to a worse environment for future generations.
 - ii. The number of houses proposed is a 27.3% increase against the current housing stock and is the largest percentage increase out of any of the other villages in the area. It is also far greater than the 10% proposed by neighbouring counties as an acceptable level of sustainable development.
 - iii. A recent questionnaire completed as part of our emerging Neighbourhood Plan defined the average number of houses people in Pirton would like to see built as 48. The 142 houses proposed by the local plan are far in excess of this.

2. **Boundary:** The proposed extension of the Village Development Boundary beyond the proposed sites is unnecessary and unacceptable. Furthermore, relating to the above scale of development, we object to any boundary extension beyond what is required to encompass any final agreed site allocation.

3. **Holwell Turn Site:** This site is considered dangerous and unacceptable and should be removed from the proposed site allocations.

3. HOUSING NUMBERS

‘Nimbys will take over and stop all new development’ – This argument assumes that our highly centralised planning system is delivering the development we need. In fact, new homes are being built at the slowest rate since the war and investment in new infrastructure is falling behind. The only way forward is to embrace decentralised development that is not merely accepted, but actually led by local communities – because local people get to share in the benefits.

Extract from Decentralisation and the Localism Bill

- a. The NHDC Local Plan Preferred Options (‘the Plan’) proposes the building of 12,100 new homes in North Hertfordshire to meet the perceived requirement of the area, plus a further 2,100 homes to meet the needs of Luton. These figures have been based on the 2013 Strategic Housing Market Assessment and are designed to meet the requirements of the National Planning Policy Framework (NPPF).
- b. New homes are proposed across the North Herts area, with the greatest concentrations being on the periphery of established centres of population (Baldock, Royston, Letchworth, Hitchin and Stevenage). In addition to these urban centres development is proposed in a number of villages across the area. These villages are classified according to their existing facilities:
 - i. Category A villages are those with schools and will have development boundaries defined, within which development will be allowed and development sites allocated. Pirton falls within this Category.
 - ii. Category B have a lower level of facilities and will see primarily infill development.
 - iii. Category C have low levels of facilities and will only support affordable housing to meet proven needs from the parish.
- c. Other Category A villages for which data is presented in the Preferred Options Consultation paper circulated by NHDC in December 2014 are as follows:

Ashwell	Hexton	Reed
Barkway	Ickleford	Sandon
Barley	Kimpton	St.Ippolyts
Breachwood Green	Knebworth	Therfield
Codicote	Offley	Weston
Graveley	Preston	Whitwell

- d. The proposed number of new homes for each village differs widely, from no development at all in Hexton and Sandon, to some villages where proposed development represents over 20% of the existing number of houses. Pirton tops the list with a proposed increase of no less than 27.3%. Figure 1 shows a table of the villages, together with their current populations (as per the 2011 Census) and proposed numbers of new homes. Figure 2 ranks these villages in ascending order of percentage increase in numbers of dwellings.

- e. Of the 19 villages listed, only 4 have proposed increases in excess of 20% and two of these (Preston and Reed) are starting from a very low base figure (158 and 134 current homes respectively). Knebworth at 21.6% is the only other village to have to accommodate an increase of over 20%, but even this is considerably lower than the increase proposed for Pirton.
- f. The nearest village to Pirton in terms of existing households is Whitwell, which presently has some 16 more households than Pirton. The proposed increase for Whitwell is 50 new houses, or 9.3%.
- g. The average increase across the other 18 villages is 10.9%. If applied to Pirton, this would give a figure of 57 new houses – some 85 less than the proposed figure.
- h. A recent questionnaire completed as part of our emerging Neighbourhood Plan defined the average number of houses people in Pirton would like building is 48. The 142 houses proposed by the local plan are far in excess of this. Further details of the results of the Neighbourhood Plan Questionnaire are included as Appendix 1.
- i. Neighbouring counties would seem to be of the opinion that growth of around 10% is sustainable: East Hertfordshire in its Local Plan states:

“In accordance with Policy DPS3 (Housing Supply 2011-2031) the Group 1 Villages identified below in Policy VILL1 will accommodate at least 500 new homes, spread across the villages. In applying a fair approach to the distribution of this housing growth, each of these villages will need to accommodate at least a 10% increase in housing stock (based on the 2011 Census) over the 15-year period between 1st April 2016 and 31st March 2031. This is a level of housing growth that is considered fair, achievable and sustainable for each of the settlements concerned and that will make a meaningful contribution towards alleviating future housing demands, addressing local housing needs and supporting the village economy.”

West Northamptonshire, in its Plan adopted in December 2014, allows growth on ‘a moderate scale up to 12%’ in its Primary Service Villages, whilst South Cambridgeshire in its Local Plan states:

“...the overall scale of development should be restricted in recognition of their more limited services compared to Rural Centres. A maximum scheme size of 30 dwellings is used as a guideline figure to indicate the upper limit of housing development likely to be suitable. Development will not be permitted on sites capable of accommodating scheme sizes significantly larger than 30 dwellings in Minor Rural Centres.”

South Cambridgeshire goes on to assert that

“As part of the county’s Sustainable Development Strategy 2012 (developed in conjunction with Cambridge Council) ‘Development at the more sustainable villages was confirmed as the least sustainable location ... ‘ and ‘Development in villages should continue to be limited for sustainability reasons.’ “

As stated by Mid-Bedfordshire in its Plan:

“Implicit, therefore, must be the acknowledgement that growth should only take place within an environment that is capable of supporting it.”

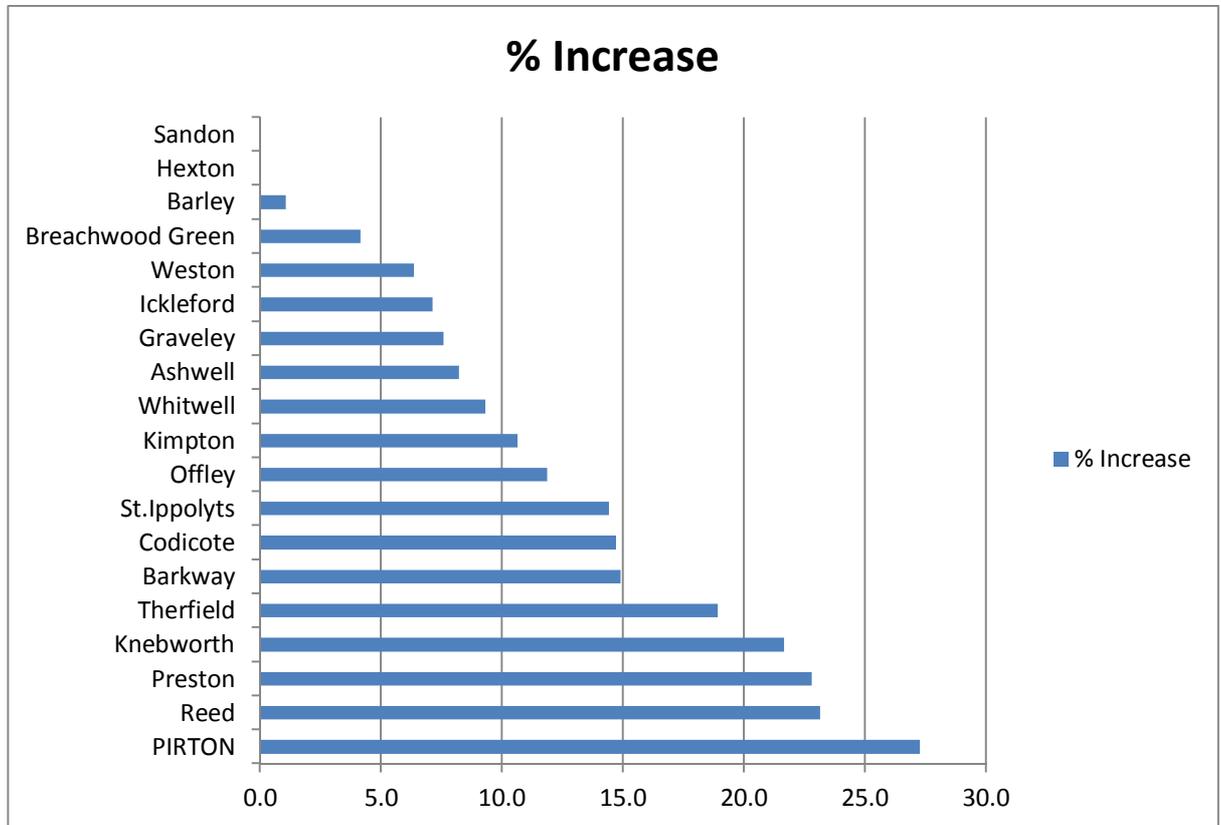
Figure.1

Category A Villages in the NHDC Local Plan

Village	Current population	No.of dwellings	Proposed Increase	No.of sites	% increase
Ashwell	1870	841	69	1	8.2
Barkway	775	329	49	2	14.9
Barley	662	287	3	-	1.0
Breachwood Green	1015	410	17	1	4.1
Codicote	3344	1496	220	3	14.7
Graveley	487	198	15	1	7.6
Hexton	123	52	0	-	0.0
Ickleford	1833	844	60	2	7.1
Kimpton	2167	884	94	3	10.6
Knebworth	4496	2002	433	2	21.6
Offley	1398	607	72	1	11.9
PIRTON	1274	521	142	2	27.3
Preston	420	158	36	1	22.8
Reed	310	134	31	2	23.1
Sandon	495	214	0	-	0.0
St.Ippolyts	2047	799	115	2	14.4
Therfield	556	217	41	2	18.9
Weston	1054	441	28	1	6.3
Whitwell	1293	537	50	1	9.3

Figure.2

Category A Villages ranked by proposed percentage Increase in the number of dwellings



Please note that the parish of Wymondley has been excluded from the above figures. This parish includes the villages of Little and Great Wymondley, as well as the hamlets of Titmore Green, Redcoats Green and Todds Green, giving a total number of dwellings of 480.

However, the proposed development of 300 new homes will be sited in Little Wymondley, which currently has some 350 dwellings, giving a percentage increase for that village of over 80%. This disproportionate and quite ludicrous proposal would skew the figures above to an unacceptable degree.

Pirton Parish Council objects to the scale of the proposed development because it is unreasonable and will cause irreparable damage to the fabric of village life and to the health of the community. We believe the number of houses proposed is in direct contradiction to the overarching principle of the National Planning Policy Framework (NPPF) for sustainable development and if built within the timeframes proposed is not sustainable and would lead to a worse environment for future generations.

4. THE PROPOSED SITES

“It (the National Planning Policy Framework) sets out the Government’s requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.”

Extract from the National Planning Policy Framework

The Local Plan proposes two sites in Pirton: 88 new homes are proposed for site PT1 (Land east of Priors Hill), of which 11 are already under construction; and 47 houses at site PT2 (Holwell Turn, West Lane). These two sites, plus 7 completions and permissions at April 1st 2014 give the total figure of 142 new dwellings.

Both proposed sites are currently outside the village boundary.

a. Site PT1 – Land East of Priors Hill



- i. Site 64, as originally designated by NHDC, covers approximately 7.5 hectares (18 acres) and has been the target for developers for some years. In August 2009 a Public Meeting was held in Pirton to discuss the proposed development of Site 64 (which included both the North and South sections of this land) under the NHDC’s Local Development Framework. At that time NHDC carried out a sustainability survey on the site and identified the following weaknesses:
1. Greenfield site, classified as grade 3 agricultural land.
 2. Not many facilities and services located nearby.
 3. Likely to increase commuting and private car use.
 4. Constraints on the use of Sustainable Urban Drainage Systems.

5. Site borders an Area of Outstanding Natural Beauty.
 6. Site is within an area of archaeological interest.
 7. Site is close to an Ancient Monument.
 8. Site is located near to listed buildings.
 9. Site borders a conservation area.
- ii. In 2013 the NHDC Strategic Housing Land Availability Assessment (SHLAA) assessed this land as Category C, i.e. classed as rural area beyond the Green Belt.
 - iii. The Southern section of this site, known as Site 64S, is now identified as Site PT1 in the Local Plan Preferred Options. This is an area of 3.9 hectares and the proposal is to build 77 houses (i.e. 19.74 houses per hectare) in addition to the 11 houses already under construction in the south-east corner of the site.
 - iv. The developers Court Homes have admitted that this development would be likely to generate an additional 32 vehicles per hour two-way in the morning rush-hour, rising to 40 vehicles in the PM rush-hour. As anyone who has tried to drive into Hitchin from Pirton at 8 am on a weekday morning will know, this is a significant increase in traffic and will cause even greater bottlenecks where the B655 meets the A505 on the outskirts of Hitchin.
 - v. The principal objection to this site is the sheer numbers of dwellings proposed and the effect they would have on the health of the community. As was mentioned above, The Parish Council has welcomed proportionate development over the years, but an estate on this scale would overwhelm the resources currently available in the village and damage village life.

Where development is gradual and measured, the community can manage the integration of the additional populace and adapt accordingly.

Pirton Parish Council objects to the inclusion of 2 sites (PT1 and PT2) in the Local Plan. The number of houses proposed is a 27.3% increase against the current housing stock and is the largest percentage increase out of any of the other villages in the area. It is also far greater than the 10% proposed by neighbouring counties as an acceptable level of sustainable development. A recent questionnaire completed as part of our emerging Neighbourhood Plan defined the average number of houses people in Pirton would like to see built as 48. The 142 houses proposed by the local plan are far in excess of this.

b. Site PT2 – Holwell Turn



- i. The site at Holwell Turn creates some different problems from the Priors Hill site, mainly centred around the transport infrastructure.
- ii. The site is situated on a 90 degree bend on the north-eastern edge of the village, immediately adjoining a row of some 12 terraced houses (No's 12-24 Holwell Road) which have no off-road parking, on one of the three exit routes from Pirton, viz. to the A600 via Holwell.
- iii. There are no pavements on any of the roads and since this is a bus route, the turn is frequently congested at peak times, with any sort of pedestrian access being particularly dangerous because of on-road car parking.
- iv. It is proposed to site another 47 dwellings on this site – assuming that children residing in these new dwellings would have to make their way to the local school, this means either another large increase in traffic as parents take the option to drive to the school in the High Street, or a hazardous journey on foot along a congested route.
- v. At the time, an independent highways appraisal was commissioned by Pirton residents (included as Appendix 2). Broadly, the conclusions of this appraisal were:
 1. The development site abuts the highway on a blind bend where the carriageway is too narrow to safely accommodate two-way traffic.
 2. There is no safe pedestrian link from the site to the local amenities ... and pedestrians are forced to walk in the road.
 3. The presence of parked cars in front of the adjacent terraced houses in Holwell Road obstructs the two-way flow of traffic and pedestrians and cyclists are particularly vulnerable when vehicles are speeding or large vehicles are passing.
 4. There is no street lighting.

- vi. An application to build new houses at the Holwell Turn was considered by NHDC on January 12th 2012 (Application: 11/00413/1). This was a residential development of 8 houses, consisting of a pair of semi-detached dwellings and 6 terraced houses to provide shared-ownership homes, social rented homes and off-road parking. This application was refused.
- vii. A further application for the same level of development on this site was made in May 2012 (Application: 12/00694/1). This application was also refused and an appeal against the refusal upheld. It should be noted that on this occasion 125 representations were made by local residents, 119 of them objecting to the proposal. No fewer than 21 reasons were given for the objections.
- viii. On this occasion the application was considered in the light of the recently-implemented National Planning Policy Framework (NPPF). In short, despite the fact that the Parish Council had identified other sites within the village boundary (11 sites in all, but primarily land at the corner of Walnut Tree Road and Hitchin Road; and the 'garage' site in Pollards Way, adjoining the site currently being developed for affordable housing by Howard Cottage Housing Association as part of Site 64) the NHDC Planning Officer approved the development, albeit with a number of conditions that had to be met. The application was, however, subsequently refused on appeal.

Given that the Parish Council believes that the number of additional houses suitable for development in Pirton can be more than met without the need for Site PT2, Pirton Parish Council objects to the inclusion of site PT2 and requests that Site PT2 is dismissed altogether and removed from the Plan.

5. THE DEVELOPMENT BOUNDARY

“When defining boundaries, local planning authorities should: ... not include land which it is unnecessary to keep permanently open.”

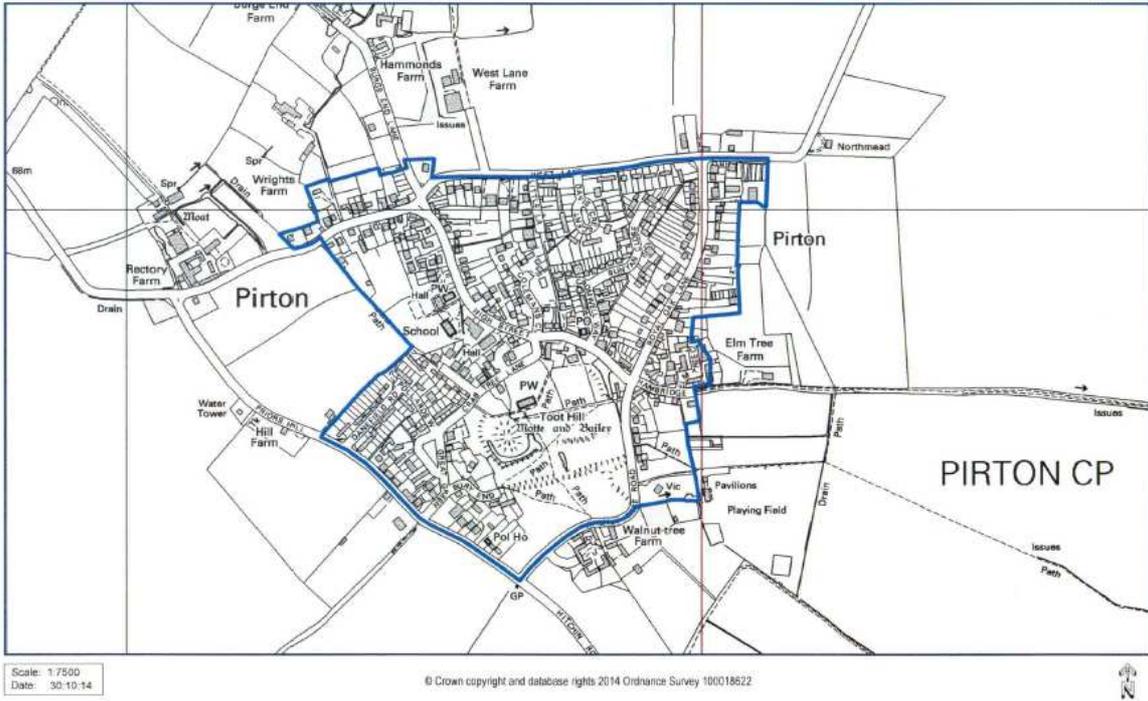
Extract from the National Planning Policy Framework

- a. Documents released with the Local Plan show extensions of the village development boundary to encompass the two new sites PT1 and PT2, however the eastern boundary has then been further extended to take in the area of Elm Tree Farm and a smaller rectangular area to the rear of houses in Royal Oak Lane.
- b. When questioned as to why the boundary had been so extended, NHDC officials gave replies along the lines of ‘the planners must have just followed the line of the fields’ or ‘it’s just so we don’t end up with a peculiarly-shaped area’. Frankly, both of these explanations are trivial dismissals of a significant additional area of land.
- c. If accepted, this enhanced boundary could leave the way open to further housing development, over and above that proposed in the Plan.
- d. The Parish Council’s contention is that area PT2 should be removed from the Plan altogether. If this suggestion is accepted then there is no need whatsoever to adjust the eastern boundary of the village. However, if development of any sort takes place on PT2, the new boundary should follow the line of that site only and under no circumstances include Elm Tree Farm or any land not identified by PT2.

Any extension to the Boundary should be to accommodate agreed development sites only.

Pirton Parish Council objects to the proposed extension of the Village Development Boundary beyond the proposed sites as unnecessary and unacceptable. Furthermore, relating to the above scale of development, we object to any boundary extension beyond what is required to encompass any final agreed site allocation.

Pirton's settlement boundary from 1996 Local Plan



The Proposed New Eastern Development Boundary



6. CONCLUSION

142 new houses in a village the size of Pirton is simply too many.

Whilst we appreciate that a reduction of 100 houses in Pirton means that the allocation to a site elsewhere has to increase by 100, there are surely larger sites on the outskirts of existing urban areas where such an enlargement would have a significantly reduced impact.

The proposed developments in Pirton have not been defined by reference to the sustainability of community life in the village, but are rather developer-led. As the Mid-Bedfordshire Plan adopted in 2005 states “Implicit, therefore, must be the acknowledgement that growth should only take place within an environment that is capable of supporting it.”

One of the major factors of life in Pirton identified by the results of the Neighbourhood Plan questionnaire was that the village has a special ‘feel’. This is hard, if not impossible, to define but is a combination of familiarity of surroundings and faces and a sense of security of being in a familiar, secure environment.

Reasonable, well-managed development can be absorbed into the existing fabric of the village so that the unique ‘feel’ of village life is not adversely affected, indeed, some 90 houses have been built in the village over the past 30 years or so; however, the imposition onto a small community of a large influx of new people would be one the village would take years to come to terms with. The crucial aspect of the proposed development should be its sustainability, as demanded by the National Planning Policy Framework. The definition of the word *sustainability* may be open to discussion, but if the Government’s criterion of leaving an environment for future generations which is not adversely affected by short-term needs is applied, then excessive development must surely be opposed.

We believe that the Local Plan as proposed by NHDC is basically flawed. The National Planning Policy Framework places maximum emphasis on the *sustainability* of future communities as affected by planning decisions. The definition of sustainability is not precise, but means essentially that communities must be more healthy for future generations as a result of development. It would appear that NHDC when considering village communities have equated growth with sustainability, a view with which neighbouring counties’ Local Plans would appear to disagree.

Faced with a SHMA which shows a requirement in the area for over 12,000 new homes, the District Council’s first priority should have been to identify large sites where new communities could be built, incorporating 21st-century transport and communications networks, as well as adequate services designed in from the start. This could have accommodated over 10,000 of the required homes, leaving just a few thousand to be distributed across existing communities in a reasonable and proportionate way.

We note that Stephen McPartland, Member of Parliament for Stevenage, in his formal response to the NHDC Local Plan Preferred Options (dated January 2015) is also in support of this approach.

The Local Plan, rather than trying to impose development on the edges of ancient small communities, alienating and inflaming residents, should have taken a positive approach to village development, imposing maximum permissible levels of development for each community. The effect of this would have been not only to produce a populace in support of the Plan, rather than diametrically opposed to it, but would have forced developers to produce more imaginative ways of satisfying the needs and wants of local communities. The Plan would have been planning-led and not developer-led, as the current version is.

We strongly urge NHDC to reconsider the number of new dwellings proposed for our village. We recognise the need for development and look forward to the opportunities sensible development can bring, but NHDC must recognise that the wrong sort of development in excessive numbers can wreak untold damage on community life.

The Parish Council would also like to reiterate its objection to the proposed extension to the north-eastern development boundary in Pirton beyond the proposed site PT2. There is no valid reason for this extension and it opens the way for even more new housing to be built between now and 2031. Any extension to the development boundary should include only the areas agreed for future development.

Finally, for the reasons given in the body of this document, the Parish Council objects to Site PT2 and believes that it should be removed from any future development plans.

Objections:

Pirton Parish Council confirms three objections to the Local Plan Preferred Options:

1. **Scale:** We believe the scale of the development is unreasonable and will cause irreparable damage to the fabric of village life and to the health of the community. We believe the number of houses proposed is in direct contradiction to the overarching principle of the National Planning Policy Framework (NPPF) for sustainable development and if built within the timeframes proposed is not sustainable and would lead to a worse environment for future generations.
2. **Boundary:** The proposed extension of the Village Development Boundary beyond the proposed sites is unnecessary and unacceptable. Furthermore, relating to the above scale of development, we object to any boundary extension beyond what is required to encompass any final agreed site allocation.
3. **Holwell Turn Site:** This site is considered dangerous and unacceptable and should be removed from the proposed site allocations.

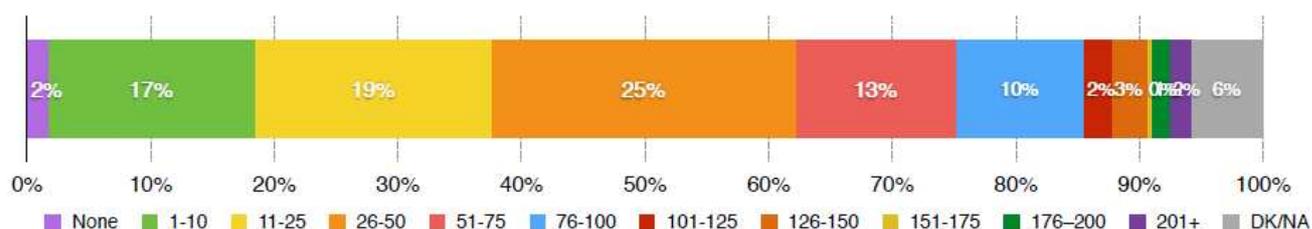
Appendix 1: The Neighbourhood Plan

“In order to fulfil its purpose of helping achieve sustainable development, planning must not simply be about scrutiny. Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives. This should be a collective enterprise. Yet, in recent years, planning has tended to exclude, rather than to include, people and communities. In part, this has been a result of targets being imposed, and decisions taken, by bodies remote from them. Dismantling the unaccountable regional apparatus and introducing neighbourhood planning addresses this.”

Extract from the National Planning Policy Framework

- a. A new Neighbourhood Plan for Pirton is being developed to coincide with the Local Plan, i.e. to cover the period up to 2031. As part of this process the local Steering Group, a Working Group of the Parish Council, circulated a questionnaire to all adults in the village in November / December 2014 to gauge their feelings towards a whole range of issues.
- b. In total 738 individual adult questionnaires were returned – this represents an individual response rate of 76%. In addition, each household was also issued with a small questionnaire and of these some 80% were returned. This is a very high response rate and gives the results considerable legitimacy.
- c. The key findings from the housing and development section are as follows:
 - i. The vast majority (93%) of people living in Pirton are satisfied with the village and like it the way it is.
 - ii. The populace is keen to see the rural, friendly, welcoming nature of the community preserved over the next 30 years.
 - iii. 88% of people living in Pirton believe it is important to have a Neighbourhood Plan.
 - iv. People were asked what they thought the ideal number of houses to be built in Pirton should be between now and 2031. The questionnaire recognised that a response of ‘zero’ was not a valid response and so this option was not included. The chart below shows that most people wanted to see fewer than 75 new houses built in the village during the lifetime of the Plan. The average figure, based on taking the mean point of each band, is for 48 new dwellings (9.2%). This level of growth is roughly equivalent to that which has taken place in the village over the last 30 years.

“How many houses do you think should be built in Pirton between now and 2031?”



- v. Ideally people in Pirton would like to see about 13 houses built every five years; their preferred option would be for several small developments of fewer than 10 houses, rather than large developments.
- vi. A large majority (73%) were in favour of infill over extending the current village boundary. The figure in favour of extending beyond the current boundary was 46%.
- vii. 23% of people chose Site PT1 (Priors Hill) for development; 11% chose Site PT2 (Holwell Turn) and 17% chose both locations.
- viii. The impact on the Environment and the development of adequate communications were of paramount importance. (95% said it is important to have green space between Pirton and neighbouring villages and towns; 95% said it is important to minimise the impact of development on woodland, hedges, footpaths, green lanes, etc.; 93% said it is important to minimise the impact on historical buildings and heritage sites; 93% said the views/vistas approaching the village are of importance to them; 88% said that improved broadband is important and 89% said that improved mobile services are important).
- ix. We believe that for NHDC to ignore the findings of the Neighbourhood Plan Steering Group would be to 'impose targets' rather than to arrive at a creative and sustainable planning solution for the village.
- x. Neighbouring counties have all recognised the importance of Neighbourhood Plans in their Local Plans. East Hertfordshire in particular has stated that:

“Prior to a Parish Council preparing a Neighbourhood Plan, development in the villages listed above will be limited to the built up area.”

**Appendix 2: Independent Report Commissioned by
Pirton residents, June 2012.**

**Graham Stephens I.Eng, FIHIE, MCIHT, DMS
Highway Planning & Engineering Consultant**

LPA REF: 12/00694/1

**PROPOSED DEVELOPMENT
OF**

8 HOUSES ON LAND AT

HOLWELL TURN,

HOLWELL ROAD,

PIRTON

Highway Appraisal

JUNE 2012

1.0 INTRODUCTION

1.1 My name is Graham Stephens and I am instructed by residents of Pirton to provide a highway appraisal of the proposed development of eight houses on land at Holwell Turn, Holwell Road, Pirton. LPA Ref: 12/00694/1

1.2 I am an Incorporated Engineer, a Fellow of the Institute of Highway Incorporated Engineers, a Member of the Chartered Institute of Highways and Transportation and I hold a Diploma in Management Studies.

1.3 I have been involved in Highway Planning and Engineering for the best part of forty-five years, the majority of which has been in local government service. Until May 2001 I was the Deputy Director of Technical Services and Head of Engineering at St. Albans District Council. At that time the District Council were the Highway Authority and I had day to day responsibility for the agency which included providing highway advice to the Planning Department.

1.4 I took early retirement when Hertfordshire County Council withdrew the agency Agreement and I set up my own consultancy specialising in highway planning. In September 2001 I was appointed as a consultant to Hertfordshire County Council to provide highway advice on planning applications in the City and District of St Albans. On their behalf, I dealt with over 8,000 applications in five years. I feel well qualified therefore to make an appraisal of this proposal.

2.0 THE SITE AND SURROUNDINGS

2.1 The proposed site is to be located on the rural area beyond the green belt land at the eastern extremity of the village of Pirton. It is situated adjacent to the east boundary of 24 Holwell Road, on the south side of the carriageway. Holwell Road is an un-numbered C Class Local Access Road. The carriageway adjacent to the site is 5 metres in width and widens to 5.5m on the bend adjacent to the eastern end of the site frontage. The carriageway is sub-standard in width for the function it serves but this is not unusual for a rural road of this nature. The carriageway is subject to a 30mph speed limit but there are no footways on either side of the road and there is no street lighting.

2.2 Pirton is a small village that boasts a Junior Mixed Infants School, a Post Office, a Church and 2 Public Houses as well as many other local amenities.

2.3 The proposed residential development comprises 8 houses consisting of a pair of semi-detached dwellings and 6 terraced houses to provide 2 x 2 and 2 x 3 bed shared ownership

homes and 2 x 2 bed and 2 x 3 bed social rented homes with associated vehicle access and off street parking

3.0 HIGHWAY CONSIDERATIONS

3.1 In considering the previous application for the residential development of this site, ref: 11/00413/1 the Council refused to grant consent for two reasons. The first related to the principle of development in the rural area beyond the Green Belt and the second that the highway aspects of the proposal had not been adequately addressed and would therefore be prejudicial to the general provisions of highway safety and convenience. Notwithstanding this, the applicant has submitted a similar layout that has apparent disregard to this, since it incorrectly (in my professional opinion) considers that there are no highway aspects that need to be addressed.

3.2 Whilst the proposed development has been designed in accordance with the local and national guidelines in respect of the site's internal highway layout and associated vehicle access and parking, in my opinion it cannot be safely integrated with the existing highway infrastructure for the following reasons.

- The development site abuts the public highway on a blind bend where the carriageway is too narrow to safely accommodate two-way traffic.
- There is no safe pedestrian link from the site to the local amenities listed above and pedestrians are forced to walk in the road.
- The presence of parked cars in front of the adjacent terraced houses in Holwell Road obstructs the two-way flow of traffic and pedestrians and cyclists are particularly vulnerable when vehicles are speeding or large vehicles are passing.
- There is no street lighting.

These are broadly the issues that residents are concerned with and have brought to the attention of Members in considering the previous application. This new application does nothing to address these issues or allay concerns.

- 3.3** I visited the site at 7.30am on Tuesday 30th May and witnessed some of the hazardous situations that arise due to the deficiency of the existing highway network. This can only be exacerbated if the development is permitted to proceed.
- 3.4** Between 7.45 and 8.30am, the road is at its busiest with commuter traffic and I witnessed several conflicts with vehicles and pedestrians, despite what are relatively low traffic flows. I counted 73 vehicles on this road between 8 and 8.30am, including 3 buses and a recycling lorry. During this brief window, one of the buses met the recycling lorry on the bend, forcing the lorry to mount the verge to avoid collision. Another bus met a small pick-up lorry in the vicinity of the proposed new access and again the lorry was forced to mount the verge. Pedestrians venturing out from the terraced houses in Holwell Road ran the gauntlet of having to walk in the road to get from their front doors to catch the buses that stopped near the junction with Royal Oak Lane.
- 3.5** Ideally, a local access road should be a minimum of 5.5m wide, with 1.8m wide footways on either side, and in urban areas should be subject to a 30mph speed restriction and have the benefit of street lighting. The carriageway in the vicinity of the site is barely 5m in width with a tall hedgerow on the north side that visually reduces the carriageway width and obstructs visibility around the bend. On bends the carriageway should be widened, the amount of widening being relative to the centre line radius of the bend. In this instance the centre line radius is 25m and the carriageway should be widened by 0.5 on either side of the road or ideally by 1m on the inside of the bend such that a total width of 6.5m is achieved. The existing bend that is of sub-standard width anyway, has been widened to 5.5m, but on the outside only, and as a result, it is not possible for two large vehicles to pass each other safely and cannot see each other as they approach the bend. The land to the north of the carriageway is in third party ownership and the carriageway cannot be widened on the inside of the bend to provide safe passing width, nor can the hedgerow be set back to achieve satisfactory forward visibility round the bend.
- 3.6** Because it is not possible to widen the bend, and consequently is not proposed in mitigation of the impact that this development will have on the existing substandard highway, large vehicles will still be forced to mount the verge areas that are to be replaced by footways and

place pedestrians at risk by doing so. This is extremely dangerous and therefore prejudicial to highway safety.

3.7 Because it is not possible to provide satisfactory forward visibility round the bend and servicing the development is likely to take place at the front, service vehicles parked on the carriageway, including the refuse vehicle will be blind to traffic approaching the bend from the Holwell direction. Vehicles making the right turn in or right turn out from the development will also be blind to vehicles approaching from the Holwell direction, given the sub-standard width of carriageway this will also be very dangerous and consequently prejudicial to highway safety.

3.8 The presence of parked cars in front of the existing terraced houses effectively reduces the carriageway width to 3.5 metres. This is too narrow for two way traffic or for shared use with pedestrians although there is no footway for a distance of 152m between the site and Royal Oak Lane. Cyclists and pedestrians are particularly vulnerable when faced with speeding cars or large vehicles that occupy the majority of the available road space. Nose to tail parking in some places means that finding a refuge is not always easy for pedestrians or cyclists. The residents of the proposed new development will add to the congestion and associated safety problems at this location, not only through the generation of additional traffic on this section of road but also through the generation of additional pedestrian movements which will grow as the residents integrate with the local community, use the local amenities and make friends. All of the local amenities can only be accessed via this stretch of road whatever mode of transport is used. I consider therefore, that the generation of additional vehicular and pedestrian traffic at this location in Holwell Road would only add to the existing problems and as a consequence be undesirable and prejudicial to highway safety.

3.9 There is no street lighting in Holwell Road and none is proposed in association with this development. It would be appropriate however to provide street lighting, particularly at the junction to make access and egress safer at night and to illuminate the new footway. I consider the lack of suitable lighting to be prejudicial to highway safety, particularly because of the narrow carriageway, blind bend and the lack of a footway in front of the existing houses in Holwell Road.

3.10 The applicant suggests that the relocation of the 30mph speed limit and traffic calming including speed activated signs could be made a condition of permission, if this were considered to be necessary in mitigation of the impact, but noted that the Highway Authority had not requested this. My view on this however is that although this may be desirable along with the introduction of street lighting, reducing traffic speed alone will not solve the inherent safety problems associated with the narrow carriageway, the blind bend and the lack of a footway in front of the existing houses in Holwell Road.

4.0 CONCLUSIONS

4.1 The proposed development does not address the highway safety issues brought to the attention of the Local Planning Authority by local residents and whilst the Highway Authority has sought to ensure that the internal highway layout, parking and access design is in accordance with local and national guidelines, it has failed to give consideration to the safe integration of this development with the existing highway.

4.2 Although permission could be granted subject to conditions to make provision for the relocation of the 30mph sign, the introduction of traffic calming including speed activated signs and the introduction of street lighting at the proposed new junction, albeit desirable, this will not solve the inherent safety problems associated with the narrow carriageway, the blind bend and the lack of a footway in Holwell Road, that will be exacerbated by the generation of additional traffic and pedestrian movements from the new development. The proposal is therefore in my opinion, prejudicial to highway safety and should be refused consent irrespective of the reasons put forward for the need to create additional housing stock in the village.

Graham Stephens IEng., FIHIE, MIHT, DMS.