**The proposed residential development of up to 41 dwellings, open space and infrastructure, Windsor Road, Barnstaple.**

**Application ref. 62524**

**Objection by the Friends of Manning’s Pit**

**Introduction**

1. A planning application has been submitted to North Devon Council for the development of up to 41 dwellings with access off Windsor Road, Barnstaple. The application is in outline with all matters reserved other than the proposed access.
2. This document sets out the objection to the development by the Friends of Manning’s Pit, a local organisation set up in 2015 to protect the area from development. The land the subject of the planning application includes most of the Manning’s Pit area.

**Site Context**

1. The application site is known locally as Manning’s Pit. The name is believed to derive from a former quarry in the north-west corner of the site and its ownership in the 19th century by Benjamin Manning and his family. The land lies on the southern side of Bradiford Water as it flows westwards towards the River Taw. It forms part of an extensive and tranquil valley setting at the foot of the North Devon Downs, on the northern edge of Pilton, a suburb of Barnstaple.
2. Access is proposed off the end of Windsor Road, a 1970s estate road that connects with the network of narrow and winding streets in Bradiford and central Pilton.
3. In the last five years planning permission for 386 dwellings has been granted on five sites to the north and east of Pilton. A further permission for 101 dwellings on land at North Devon District Hospital has lapsed. All of these sites are accessed off roads connecting directly to the A39 North Road.

**Planning Context**

1. North Devon and Torridge District Councils are in the final stages of preparation of the North Devon & Torridge Local Plan 2011-2031 (NDTLP). The Local Plan has been subject to Independent Examination, by an Inspector appointed by the Government, through local hearings, which concluded in December 2016. The Inspector’s report is awaited.
2. At the end of the hearings the Inspector set out her conclusion that the draft Local Plan adequately met the objectively assessed housing need for the area, but did not make sufficient provision for the shortfall in housing provision that had accumulated over the preceding five years. She asked the local planning authorities (LPAs) to bring forward additional sites for residential development to accommodate the shortfall. The LPAs are understood to be in the process of identifying such sites. Manning’s Pit is not believed to be one of the sites under consideration, rightly so as the supply of housing land needs to be planned on a strategic rather than opportunistic basis.
3. In the meantime the site is subject to the saved policies of the North Devon Local Plan (NDLP) which technically expired in 2011.
4. The application site is outside the development boundary in both the existing and draft Local Plans.

**Planning Considerations**

**Compliance with National Planning Policy**

1. Paragraph 14 of the National Planning Policy Framework (NPPF) sets out the presumption in favour of sustainable development. It states “For decision-taking this means:

* Where the development plan is absent, silent or relevant policies are out of date, granting permission unless:
* Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, or;
* Specific policies in this Framework indicate development should be restricted.”

1. Paragraph 17 of the NPPF sets out twelve Core Planning Principles, one of which is that neighbourhoods should “take account of the different roles and character of different areas, ….. recognising the intrinsic character and beauty of the countryside …”
2. Section 11 of the NPPF sets out the Government’s policies for conserving and enhancing the natural environment. Paragraph 109 states “The planning system should contribute to and enhance the natural and local environment by:

* Protecting and enhancing valued landscapes, …
* Minimising impacts on biodiversity…

1. Paragraph 123 identifies tranquillity as a material consideration and states “Planning policies and decisions should aim to:

* Identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.”

1. Para 216 of the NPPF states that:

“*From the day of publication, decision-takers may also give weight to relevant policies in emerging plans according to:*

* *The stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given);*
* *The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given), and;*
* *The degree of consistency of the relevant policies in the emerging plan to the policies in this Framework.*

**Five Year Supply of Housing Land**

1. In view of the Inspector’s findings at the end of the Local Plan hearings, it may be considered that the LPA cannot demonstrate that it has fully complied with the requirement in Paragraph 47 of the National Planning Policy Framework (NPPF) to have a five year supply of housing land. However that does not necessarily mean that all possible housing sites are suitable for development and should be granted planning permission.
2. The “Daventry” case and subsequent appeal decisions have demonstrated that it cannot be taken as a given that where a development plan is dated and where the local planning authority cannot demonstrate a five year supply of housing land, planning permission for housing proposals would ordinarily be granted. In circumstances where the local policy in question is consistent with national policy, the housing shortfall is not overwhelming and the local authority is taking steps to address it, housing proposals which do not comply with the development plan are likely to be refused.

**Local Plan Context**

1. Since the development of Lynbro Road to the south of the site and Windsor Road to the west, in the 1960s and 70s, the local planning authority has consistently protected the landscape and biodiversity of the Manning’s Pit area in successive local plans, by excluding it from the development boundary for Barnstaple. This is consistent with the existence of the County Wildlife Site along Shearford Lane beyond the eastern boundary and Bradiford Water on the northern boundary and of the Tutshill Wood and Bradiford Water SSSI on the land to the north and north-east of the site across the Bradiford Water. It is also consistent with the Landscape Character Assessment of North Devon adopted by the LPA in 2011, which identifies the area as part of a Secluded Valley landscape character area (see below).
2. This policy consistency is reflected in local plan policies. Policy ENV1 of the adopted North Devon Local Plan and its equivalent policy ST14 in the draft North Devon & Torridge Local Plan are both intended to give protection to the open countryside. Other policies reflect material considerations such as the development boundary (ST06) and traffic issues (DM04 and DM06).
3. The North Devon & Torridge Local Plan has passed through its Independent Examination Stage (December 2016). There were no unresolved objections to Policy ST06 (in respect to the development boundary in the vicinity of the site) or to Policy ST14 (Enhancing Environmental Assets). The main outstanding issues were in the wording of certain Development Management policies and in the need to identify additional housing sites to satisfy the shortfall in terms of the five year supply of housing land. Therefore both the LPA and the local community are entitled to give weight to these and other policies in the emerging plan when considering proposals for the site.
4. Recent planning permissions granted in the vicinity of the site, at Westaway Plain and Westaway Reach, have also maintained this consistency of approach; neither of them has been allowed to develop below, that is to the north of, the ridge followed by Lynbro Road. Indeed the reasons for the open space and landscaping conditions imposed on the Westaway Plain application emphasise the tranquillity and landscape merit of the area. In addition those sites are accessed directly from Westaway Plain, via the A39 Hospital junction which is currently being improved to accommodate them. They therefore represent sustainable development in a way that the proposed development off Windsor Road, the traffic from which will have to use the narrow and inadequate road network of the older part of Pilton, does not.
5. The remainder of this objection sets out why the site is unsuitable for housing development and planning permission should therefore not be granted.

**Landscape Matters**

1. The assessment of the landscape impact of the proposed development, provided by the Friends’ landscape consultant Pete Leaver of DWP Architects, is attached to this objection. In summary it indicates the following.
2. The effects of the proposal are localised – the development will have visual and landscape impacts on an area that is well defined. The issues for decision makers centre on how valuable this local landscape is and what the impact of the development will be on its character and qualities.

Local Landscape Character

1. The proposal sits within the context of an enclosed valley, constrained in the east by Tutshill Woods and to the west by housing on Windsor Road. The valley sides define the edges of the local landscape to north and south. This area, much as that defined in the LVIA fig 6, is considered to be the “local landscape”.

Value

1. Much of the local landscape display qualities and characteristics of **high** value. The area that can be described as a **valued landscape** runs along the valley bottom, up to the top of the valley slope and existing housing on Lynbro Road is considered to be of lower value, because of the detracting influence of exiting housing.

Susceptibility

1. Many of the qualities and characteristics that contribute to the value of the local landscape are **highly** susceptible to development on the edges of the valley. These include:

**High levels of visual and functional integrity -** susceptible to damage by development encroachment into the narrow visual envelope of the secluded valley.

**Scenic quality of timeless, unspoilt rurality –** susceptible to encroachment of modern development and associated noise, light pollution etc.

**Tranquillity and sense of wildness –** susceptible to encroachment of modern development and associated noise, light pollution etc. Susceptible to increased visitor pressure.

**State of repair of landscape elements –** susceptible to increased visitor pressure.

Sensitivity

1. The valley bottom and lower slopes, Tutshill Woods and upper part of the northern valley slopes have a **high** sensitivity to the type of development proposed. The top of the valley, adjacent to Lynbro Road, has a **medium** sensitivity.

Magnitude of change and overall effect

1. Development encroachment on the valley would have a large adverse impact on the qualities of tranquillity and seclusion in the local landscape, its functional and visual integrity and its perceptual qualities. These landscape and visual impacts would be greatest in the area west of Shearford Lane. Landscape impacts would be permanent and their reversal would not be practical. Application of the criteria at Table A.3 of the submitted LVIA suggests that such a change would be of **high** magnitude. This assessment would be reduced to **medium** because the geographical extent of the impact would influence the landscape at a local scale. Combined with a high sensitivity, overall landscape effects on the Bradiford Water valley are considered to be **moderate to major adverse**. Visual impacts in the same area would be **major adverse** and **moderate adverse**.

Planning policy

1. Paragraph 109 of the National Planning Policy Framework requires the planning system to contribute to “protecting and enhancing valued landscapes”. North Devon Local Plan Policy ENV1 has much the same stance, requiring development in the countryside to protect and enhance its beauty and the diversity of its landscape. My assessment is that the local landscape around Manning’s Pit is a valued landscape. The predicted moderate and major adverse landscape impacts would fail to protect and enhance this valued landscape.

**Wildlife Matters**

1. The assessment of the wildlife impact of the proposed development, provided by the Friends’ consultant ecologist John Day, is attached to this objection. The report’s Review of Planning Guidance is set out here. The Local Planning Authority’s attention is also drawn to the Summary at the start of the Ecological Statement.

Introduction

1. HM Government is committed to halt the decline in national biodiversity. For planning matters this is expressed through the guidance contained within the National Planning Policy Framework (NPPF). The aspirations of the NPPF are reflected in both saved and emerging local plan policies (NDLP and ND&TLP).
2. The consultant’s conclusions are as follows.

Net Gain in Biodiversity

1. The central tenet of the commitment is expressed in paragraph 109. The planning system should *minimise impacts on biodiversity* and seek to *provide net gains in biodiversity*.
2. These commitments are echoed in local plan policies. NDTLP Emerging local plan policy ST14 states: - *The quality of northern Devon’s natural environment will be protected and enhanced by ensuring that development contributes to: (a) providing a net gain in northern Devon’s biodiversity.* North Devon Local Plan Saved Policy ENV 1 indicates that development in the countryside will only be permitted where it protects or enhances ecological value.
3. No gain whatsoever would accrue from the proposed development. There is no meaningful or appropriate mitigation offered to compensate for the significant losses which would occur. On the contrary most of the features of greatest ecological interest are overlooked or ignored. As it stands a significant net loss in biodiversity is anticipated should the application be permitted in its current form.

Land with the least environmental value

1. Having established the principle of net gain in biodiversity the Framework, in paragraph 110, then directs development towards *land with the least environmental value.* The application site falls at this hurdle. It is very clearly above the standard of *least environmental value.* It adjoins a SSSI, is in part a County Wildlife Site, and has 2 designations relating to its wildlife corridor functions and supports many Protected and Priority Habitats and Species. It is already considered within the planning system as having merit. Development here would be inappropriate.

Level of Protection

1. In paragraph 113 the Framework establishes a hierarchy for levels of protection commensurate with level of ecological interest ranging from international to local. The application site supports or contributes towards wildlife interests across the complete range. From internationally significant, Horseshoe bats and Caen Valley SSSI, through nationally significant Bradiford Valley SSSI, Dormouse, Otter, Breeding Birds, to county level Shearford Lane and Bradiford Valley Scarp CWS, veteran trees, wildlife corridor and onto district importance, grassland, hedges, river, bat assemblage plus many features parish level interest.

Ecological Networks, Wildlife Corridors and Green Infrastructure

1. Paragraph 114 of the Framework directs local authorities to plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. This aspiration is consolidated in paragraph 117 *promote the preservation, restoration and re-creation of ecological networks.*
2. Saved NDLP Policy ENV8 (BIODIVERSITY) indicates that *development will not be permitted where it harms a substantive biodiversity network*
3. Emerging NDTLP Policy ST14 seeks a) *an enhanced network of designated sites and green infrastructure*; and by (h) *conserving and enhancing the robustness of northern Devon’s ecosystems*
4. Barnstaple was ahead of the curve with regard to the promotion of networks. A 2005 report by the DWT established and mapped the network of green spaces considered important for wildlife around the urban zone. This was adopted as SPG to its saved policy ENV 8 by NDDC.

The application site is within an important wildlife corridor noted in particular for the number of associated EPS, Otter, Dormouse, Horseshoe bat (2 species) and potentially Bullhead. Corridor functionality is unavoidable and would be severely disrupted in the case of Otter and Horseshoe bat.

1. Development here would run counter to the both national and local aspirations and targets.

Sites of Special Scientific Interest

1. NPPF paragraph 118 states *proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted.*
2. Saved NDDC local plan policy ENV 10 states *development will not be permitted where it would harm the wildlife interest features of a SSSI*.
3. Bradiford Valley SSSI is contiguous with the application site. Interest features of Bradiford Valley SSSI include breeding birds, Dormouse, Otter, and Horseshoe Bat (NE 2017). All of these interests are threatened through increased disturbances both from this proposed development and cumulatively with other nearby recent permissions. Disturbances from people, dogs and predation by cats would increase significantly within the SSSI and could be critical in the case of Dormouse and some breeding birds. Disruption of flightways and increased light levels within the valley are liable to significantly reduce the value of the SSSI for Horseshoe bats.
4. Caen Valley SSSI, some 8 km distant, is of international significance in respect of GHB. NE (2017) considers that the Bradiford valley is important as a foraging area for bats from the SSSI. Development on the application site in combination with nearby permissions would reduce foraging opportunities in this valley and therefore have a negative impact on SSSI interests.
5. The level of damage to SSSI interests accruing from the proposed development are unacceptable and do not accord with planning guidance.

County Wildlife Sites

1. NPPF directs that sites should receive protection commensurate with their level of interest. Sites of County importance have relevance within the hierarchy. Paragraph 118 states *if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.*
2. Saved NDDC local plan policy ENV 10 states *development will not be permitted where it would harm a county wildlife site.*
3. Bradiford Scarp and Shearford Lane CWS lies partially within the application site. Its interests are directly threatened by the proposals. Construction damage is anticipated from a proposed footway and from remedial action associated with former quarrying. In addition, a very significant increase in disturbance is predicted throughout the CWS from a variety of sources, footfall, dogs, predatory cats, increased light spill, willful damage and eutrophication.
4. Damage would undoubtedly occur to CWS interests; there is no mitigation or compensation offered. Therefore the proposal is non-compliant with planning guidance.

Habitats

1. NPPF paragraph 117 offers protection to Priority Habitats *planning policies should promote the preservation, restoration and re-creation of priority habitats*
2. This is represented locally NDLP Saved Policy ENV8 *development* will *not be permitted where it harms a substantive biodiversity habitat*.
3. The application site supports several Priority Habitats: Lowland Mixed Deciduous Woodland, Lowland Meadow, Lowland Fen, River and Hedge. All of these would be diminished or would deteriorate as a result of the development proposals. The only positive mitigation offered is supplementary planting in existing hedges. Other measures offered as mitigation, attenuation ponds and a new hedge, would destroy a habitat of greater value, Lowland Meadow.
4. The development runs counter to commitments on biodiversity. It would cause a net loss in Priority Habitats and deterioration in the condition of existing features.

European Protected Species (EPS)

1. NDLP Saved Policy ENV 11 states *development will not be permitted where it would damage, destroy or lead to the deterioration of a breeding site, foraging area or resting place of a European Protected Species*.
2. ND&TLP Emerging Policy ST14 states:-*The quality of northern Devon’s natural environment will be protected and enhanced by ensuring that development contributes to: (b) conserving European protected species and the habitats on which they depend;*

*Paragraph 6.4 states European protected species will be conserved by protecting and enhancing the key habitats on which they depend, including for feeding, burrowing, roosting and hibernating. Flyways for bats will be protected by considering impacts from lighting.*

1. Several EPS are associated with the development site. Foremost in terms of threat are Horseshoe bats. Significant numbers of LHB use the application on a regular basis. Developed is scheduled adjacent to their principal flightway. A Lesser Horseshoe Bat colony is placed in severe jeopardy by the proposal, which is likely to prevent the bats moving through the site in future due to disturbance from light spill. Greater Horseshoe Bat forage over the area. Their ability to maintain a population here at existing levels is compromised by a reduction in foraging habitat to a built environment and a loss of commuting possibilities due to light spill.
2. Otter resting opportunities would be lost in Bradiford Scarp CWS and to Bradiford Valley SSSI due to disturbances.
3. Dormouse occurs within Bradiford Valley SSSI. The population is placed in jeopardy by the increased predator pressure from domestic cats both from this development and cumulatively with recent nearby permitted developments.
4. The applicant failed to survey or account for Bullhead, which may be present in Bradiford Water.
5. With both critical and substantial deleterious impacts predicted on the several, associated EPS and no mitigation offered the application clearly fails to satisfy current planning guidance.

Protected and Priority Species

1. NPPF paragraph 117 aims to minimize impacts on biodiversity bypromoting the protection and recovery of priority species populations, linked to national and local targets.
2. NDLP Saved Polices ENV 8 and ENV 11 also provide guidance in respect of species.

ENV 8 *development will not be permitted where it harms a substantive biodiversity species*

ENV11*development will not be permitted where it would directly harm a statutorily protected animal or plant species.*

1. National and local guidance indicates that Priority Species, Protected Species and Devon BAP species should have relevance within the planning process.
2. The application site and the adjoining habitats of the SSSI support a good range of such species:- many breeding birds, 8 species of bat, 2 species of Fritillary butterfly, Great Green Bush Cricket, Slow-worm, Grass Snake, Primrose. Others such as amphibians, Hedgehog, Water Shrew, Badger and Harvest Mouse are likely possibilities. Only bats and reptiles were surveyed by applicant.
3. Predictable impacts indicate that there would be a net loss to protected and priority species.

Veteran Trees

1. NPPF paragraph 118 directs local planning authorities to refuse planning permission *for development resulting in the loss or deterioration of irreplaceable habitats, including the loss of aged or veteran trees found outside ancient woodland,*
2. Veteran trees of high ecological interest occur towards the centre of the application site. They are threatened post-development by incorporation into public open space, which would without mitigation and none is offered, inevitably lead to deterioration in condition and probable loss.

Light

1. NPPF paragraph 125 seeks to reduce impact on nature conservation by limiting light pollution.
2. Mitigation is not offered in respect of the vital Horseshoe bat flightways.

Land Instability

1. NPPF paragraphs 120 and 121 direct local authorities to prevent unacceptable risks from land instability and to ensure that new development is appropriate for its location and to take account of impacts on the natural environment arising from remediation.
2. There is a land stability issue here with former quarrying, on ground known locally as Manning’s Pit. This feature is ignored or overlooked in all submitted documents including the Site Investigation Report and topographical plans (FRA). Any remedial action would involve damage to the CWS and its interests. It would damage the Priority Habitats, Lowland Mixed Deciduous Woodland and Lowland Fen as well as adversely affecting wildlife corridor functionality.

**Traffic Matters**

1. The assessment of the traffic impact of the proposed development, provided by the Friends’ traffic consultant Mark Baker of MBC, is attached to this objection.

75. The report summarises the concerns as follows:

i) The site is in excess of or at the extremities of the target distances oft referred to for accessibility. Furthermore, the quality of the existing village footway network will act potentially as a deterrent to pedestrian use, and any intensification that may follow as a result of this development, and cumulatively with others will impact upon pedestrian safety by resulting in an increase in pedestrian movements along sections of constrained footway width,

ii) Access via Windsor Road creates a number of concerns with regard to the interaction with private garages,

iii) There are concerns about the operation of the Pilton Quay / Pilton Street junction, and the “blocking back” due to the operation of the A39 / Pilton Quay traffic signalised junction operation. There are also concerns regarding the impact of the additional traffic generated by the development and how it impacts upon the operation of the Under Minnow Road / Abbey Road junction where the Abbey Road arm of the junction (the minor arm) is traffic calmed resulting in effectively a single track width of Abbey Road on the direct approach to Under Minnow Road. Any intensification in use of the junction either turning in or turning out leads to an increased propensity for queuing, and delays impacting upon driver frustration, and driver safety, and

iv) There has to be a concern about the cumulative impact on the local routes including on the footway links, and at the footway provisions namely along Under Minnow Road, Bull Hill, and Pilton Street, and at the Under Minnow Road / Abbey Road junction and the traffic signalled junction of the A39 / Pilton Quay.

1. In accordance with paragraph 32 of the NPPF the issue is whether a safe and suitable access can be achieved for all users, and whether there is a severe impact. In my opinion, a safe and suitable access cannot be achieved. As such it follows that there is a severe impact of the proposal.
2. This conclusion is consistent with the statement in the SHLAA for the site that there is “inadequate capacity on approach routes through Pilton”.

**Other Material Considerations**

1. The local community has for generations enjoyed access to the Manning’s Pit area, through public and permissive rights of way. It is a cherished area of countryside that is used for informal recreation, including dog-walking, running and swimming in the stream. In other circumstances the area would be considered fully to comply with the provision in the NPPF for Local Green Spaces (paragraphs 76 and 77). The Friends of Manning’s Pit will be seeking formal designation of the area for that purpose in subsequent development plan processes.
2. The Manning’s Pit area of the Bradiford Valley has significant historic and cultural associations. Not only does it lie within the foreground of the westwards view from the Burridge Hill Fort, but important artists and writers have strong associations with the area. These include the Royal Academician Francis Richard Lee and the writer Saki (HH Monro). Policy ST15 (NDTLP) refers to conserving and enhancing the historic dimension of the landscape. This will not be achieved if part of that landscape is allowed to be developed.
3. The fact that the application is in outline does not preclude the development of further houses beyond the 41 shown on the illustrative master plan. Indeed, given the illustrative layout, access could easily be achieved to that part of the site lying to the north-east of the development (and to the field in the applicant’s ownership immediately to the east).
4. In the Strategic Housing Land Availability Assessment (SHLAA) of the land north of Lynbro Road (SHA/BAR/054) it is acknowledged that the land is mostly Grade 3a. This is a higher grade than the predominant agricultural land quality, 3c in North Devon, and Policy ENV7 of the North Devon Local Plan requires the best and most versatile land to be protected. The loss of grade 3a land is a further reason that development of the site should be resisted.
5. There is understood to be some doubt as to the capacity of the local primary schools in Pilton (Pilton Infants and Pilton Bluecoat Junior) to accommodate further development. The SHLAA also notes concern for the capacity of local health facilities.
6. It is noted that Certificate A accompanying the planning application has been signed by the agent. The Friends understand that access from the end of the adopted length of Windsor Road is in separate ownership, possibly Pearce Construction. In addition the proposed footway on the north side of Windsor Road appears to encroach onto the garage forecourts, which are also understood to be in private ownership. In this event Certificate B ought to have been signed and submitted and notice served on the owners.

**Summary**

1. In summary, it is the edge of town areas that have distinctive qualities of landscape character, openness, biodiversity and tranquillity and a history of community use and enjoyment that make towns and cities liveable. Manning’s Pit is one such area. To allow development to encroach on such an area is not sustainable in terms of the NPPF nor is it acceptable to the local community, which is entitled to rely on the planning policies of the LPA for the protection of its quality of life and the quality of the environment.

**Conclusion**

1. In conclusion, the Friends of Manning’s Pit object to the proposed development on the grounds that:

* The site is outside the development boundary for Barnstaple in both the adopted and emerging local plans for the area and represents development in the open countryside contrary to Policies ENV1 of the adopted North Devon Local Plan (NDLP) and Policies ST06 and ST14 of the emerging North Devon & Torridge Local Plan (NDTLP).
* Development would lead to the loss of the best and most versatile agricultural land contrary to Policies ENV7 (NDLP) and ST14 (NDTLP).
* The site is part of the Bradiford Water Secluded Valley Landscape Character area and its development would adversely impact the beauty and tranquillity of the area, contrary to the adopted Landscape Character Assessment for North Devon and to Policy ST14.
* The site lies adjacent to the Bradiford Valley SSSI and Bradiford Scarp County Wildlife Site and its development for housing and associated infrastructure would adversely impact the biodiversity of the area and disturb protected species, including bats and otters, contrary to the nature conservation polices of the NPPF and to Policies ENV8 (NDLP) and ST14 and DM08 (NDTLP).
* There is inadequate capacity in the highway network of the Bradiford and central Pilton areas to accommodate any additional traffic. The development would therefore have an adverse impact on congestion and road safety in the area contrary to policies DM04 and DM06 of the emerging Local Plan.
* The site and surrounding area have been enjoyed by the community of Pilton and beyond for informal recreational purposes for generations. It is a cherished historic landscape with significant cultural associations that qualifies for consideration as Local Green Space under Para 76 of the NPPF. It should therefore be protected for the benefit of the local community.
* In view of the foregoing, the site does not represent sustainable development in the terms of NPPF paragraph 14, since the adverse impacts of granting planning permission significantly and demonstrably outweigh the benefits. Accordingly the site is not suitable for development and the question of whether the LPA can show a five year supply of housing land in accordance with para 47 of the NPPF does not arise.

*FMP objection 15 March 2017*

*Version 3.2*