

RESPONSE

TO

DESIGN & ACCESS STATEMENT

(APPLICATION 22/01720/OUT)



SHOCK

Comments on LVA Design and Access Statement

The design and access statement prepared is to support and explain the outline planning permission application. It is therefore intentionally broad, with details of layout, scale, appearance and landscaping reserved. The comments below are reflective of this.

Layout/Movement

Much of the Masterplan is described in terms of the routes it offers and ranging transport modes it promotes. SSDC is also reminded that the King's Hill site appears not to have the necessary legal rights over the village hall lane to permit the Masterplan to be lawfully implemented.

Cul de Sac

The cul-de-sac nature of the development by definition does not integrate itself or contribute to the transport circulation of the village, and further establishes itself as a distinct and disconnected appendage beyond the outskirts. It neither forms a 'Green Gateway', or entrance to the village, as claimed by the authors (1.5 *Summary of Proposals*), as it only serves its own residents, does not offer a new route, or fall on an existing connection in accessing the village core. All the Masterplan does is retain the existing footpaths that traverse the site and rear pedestrian access route for the village hall - these are existing and not new offerings.

Village Hall Access

This proposed access to the village hall was put forward as a 'new community facility' after blocking vehicular access from Chistle's Lane. In fact it is nothing of the sort. This again would benefit only residents of the estate. For residents outside the estate, it would provide a rather protracted and counter-intuitive route to take to the village hall and play areas and would only serve to increase the traffic along the High Street (B3153). Moreover it would add to the hazard of turning right from the proposed housing estate to join the B3153. Therefore this would prove detrimental to the general rural community of Keinton Mandeville, not beneficial, and fails to appreciate that users of the recreational areas around the village hall come there from the village school, often on foot with parents, having been collected when lessons end for the day.

Scale/Location

The scale of this development and number of proposed dwellings far exceeds what the existing (and already over capacity) village facilities can cope with. This increases the number of journeys and embeds the reliance on cars in accessing the facilities in the wider area, increasing traffic activity around the adjoining dangerous road segment, and local air pollution levels.

The above points all run counter to the National Design Guide guidance on movement network characteristics, in terms of offering safe, accessible and efficient streets, genuine choice of sustainable transport modes, limiting impact of car use, and in improving air quality.

Masterplan

Character Areas

An analysis of the village is carried out to define the scale and characteristics of the existing character areas and to ensure the development integrates with its context and the existing grain (3.3 *Identity*). The proposed Masterplan is then defined by 3 separate character area types, subdivided into smaller areas and arranged around the site (4.6 Character Areas). It is clear that these defined areas are of a completely different scale (and method of arrangement) compared with the existing village character areas defined by the analysis that it supposedly draws from, ie the plan shows one thing and the commentary another!

Density

The densities of the existing character areas are given as Area 1: 32 Dwellings/Ha, Area 2: 16 Dwellings/Ha, Area 3: 30 Dwellings/Ha, Area 4: 25 Dwellings/Ha. The proposal offers less than 12 Dwellings/Ha (120 dwellings in 10.26Ha). It is therefore hard to see how the existing densities have been used to inform the proposed layout (3.3 *Built Form*). It would suggest that the site is of inappropriate size (sprawl), the dwellings too widely and evenly spread, and its overall location too far removed to really integrate itself with, and offer the diversity, of the existing village densities, organisation and grain. But the Masterplan drawing contradicts this.

Masterplan Illustration

The Masterplan drawing shows only the house frontages sitting upon fully grassed areas. This is intentionally misleading and clearly done so that the viewer cannot get a sense of the actual areas of 'built footprints' of the dwellings, and thus, the true effect of the density and developed areas over the existing agricultural land.

Sustainability

Given that sustainability and tackling climate change forms part of the mission statement on both the LVA and the Urbanists website, it is surprising not to see a dedicated section or document on the development's sustainability and low-carbon ambitions. One would expect to see a commitment to achieve a particular level of renewable energy generation, and to declare at this stage which sustainability/carbon metrics and benchmarks the architectural components will achieve (e.g Passive House, NZEB, Net-Zero, BREAAM Ratings etc.). Many of these requirements have already been applied by other local authorities in the UK, are championed by

the RIBA/ARB, and should constitute the bare minimum given the context of our global climatic emergency.

Document Quality/Research

These documents provide the only evidence we have on the care, quality, attention to detail and ambition of the development itself and the consultant team that will deliver it. It is therefore quite alarming to see the litany of errors throughout these documents, from grammar and spelling mistakes (throughout), incomplete sentences (e.g. 3.3 p.32), inaccurately measured distances (see Schedule to the SHOCK response) through to photographs keyed in entirely incorrect locations (e.g. 2.2 p.15). It is not entirely clear based on this whether those preparing the documents and developing the design have even visited the site. The generally poor and misleading quality of the work makes it questionable whether the Urbanists should be responsible for delivering such a substantial, over-developed, and inappropriate scheme in this highly sensitive location. This is compounded by the Urbanists' references to "urban design" and "townscape" in the Masterplan text, which makes one wonder from which city suburb design the text was cut and pasted from !