

Benson Parish Council Response to Elivia Homes Outline Application for 170 Dwellings on Land South of Watlington Road Benson – P26/S1811/O

Principles & Quantum of Development

- Benson Parish Council and Benson's Neighbourhood Plan Team OBJECT STRONGLY to this rerun of Elivia's 2016 application on the same piece of land (P16/S3441/O). This application was originally for 180 dwellings, but was reduced to 120 dwellings during the appeal process and a call-in by the Secretary of State. The appeal was subsequently dismissed.
- This latest application for 170 houses reflects the applicants' aim to ensure that the application, if SODC is minded to refuse, is referred to the Secretary of State under the Government's projected 150-dwelling threshold. The applicants' 'Illustrative Landscape Strategy' is vague in the extreme, but does suggest just how much more crowded the eventual layout is likely to be compared with the revised 120-dwelling version of the previous application. The site now proposed (unchanged from the previous application) cannot possibly accommodate 170 dwellings, plus all the associated green space and infrastructure required, without creating a very cramped and urbanised estate for its intended residents - and replacing yet more of Benson's surrounding countryside with intrusive and unattractive housing development.
- Specific concerns with the 'Illustrative Landscape Strategy' include the lack of usable public open space. It is not clear whether or how residents will be able to use the woodland buffer in any meaningful way. Otherwise, there are a mass of grand sounding features (community allotments, ornamental shrub beds, landscape feature garden, wildflower swathes, even the bits categorised "LEAP, LAP, Trim Trails and Informal Play areas"), but none of this offers enough open space for a kickaround or an informal game of chase. Every possible piece of green space that is not a private garden is labelled to suggest a recreational purpose - the SuDs are 'swales and grassland' and the scraps of green that nobody will care to look after are 'green amenity frontages'; but the truth is that this plan struggles from the outset because the housing number has been set so high.
- We are also very concerned that the applicants may believe they can achieve their housing quantum by building up. The Building Heights Parameter Plan clearly envisages ridge heights of up to 10.5 metres (slightly disingenuously described as 9.5m +/- 1.0m). The applicants appear to be wholly unaware of (or not interested in) the NP's Design Policy NP7 and its associated Appendix B Design Statement, particularly the Design Principles in Sections C (Benson in the Wider Landscape) and Section M (New Housing around Benson). This Policy NP7 and associated Principles stress the importance of the

perception of Benson as lying distinctively low in the landscape and the need for new development to respect this and not build above 2-storey. Principle C1 of Appendix B states:

“All new built development should maintain a low profile with standard provision for two storeys or less. Further occasional second-floor accommodation in the roof space may be acceptable but not where buildings stand on higher ground or adjacent to the landscape setting”.

Measured against Principle C1, this outline proposal would be completely inappropriate on rising land on the edge of a rural village, intrusively dominant behind the line of low historic houses on Brook Street and dominant too behind the bungalows here and on Blacklands Road.

Development in the Countryside

- The proposed site clearly lies beyond the boundary of Benson defined in our NP and is therefore subject to SOLP's policies for building in the countryside. These SODC policies are explicitly cited in NP Policy NP1 (Housing) and were afforded substantial weight by the Inspector (cf Para 120 of his report) for the most recent appeal decision in Benson at the Orchard, Braze Lane (P24/S3131/FUL, Appeal Re Q3115/W/25/3374232). These SOLP policies are explicitly engaged in our NP, as the applicant accepts.
- Likewise our NP's Policies NP27, NP28 and NP29 - in conjunction with SOLP policies ENV1, DES1 and DES2, which they also engage - aim to protect Benson's countryside setting. The Inspector for the Orchard also gave substantial weight to these policies in his decision (Para 121).
- This application for a large market housing development on this site in the countryside does not benefit from any specialist housing or exception status in SOLP policies. It is therefore in conflict with SOLP and NP policies, inappropriate, and unwelcome to the whole community of Benson.
- Benson village has seen a total of 831 new dwellings built since 2018 (of which 565 were allocated in our NP). This represents a 62% increase on Benson's existing housing stock of 1,350 dwellings in just 8 years and the growth has created huge strains on almost all Benson's infrastructure and core services:
 - the Relief Road originally planned to be fully open in 2024 is now unlikely to be open before Summer 2027 and many of the houses on the new developments remain to be sold/occupied, some are not even finished yet.
 - There are already insufficient places at Wallingford School and many parents are currently being refused enrolment there and being advised that their children will have to be bussed to schools elsewhere.
 - Our health services are close to full capacity too, even before occupation of the DWH and Bewley developments reach completion – absolutely no allowance has been made for this site.
 - And the major water management issues, particularly flooding and sewage leaks, which have dogged Benson residents for over 20 years, will inevitably ratchet up again. The land around Benson slopes down from east to west as it falls from the Chilterns to the River Thames and every time a new

development is added in the east, there are impacts on houses further down the slope. The most recent example of this is the Bewley development where, as a result of the flows passing down from the DWH site, work is currently stalled to enable a huge emergency overflow pond to be built, in order to protect the Cala site below!

- Benson needs time to absorb this growth and integrate its new residents before any further significant development is even considered.

Proposed Vehicle Access

- The proposed vehicle access onto the Watlington Road is in fundamental conflict with the policies and the logic of Benson's NP, which secured Benson's Relief Road, in order to draw traffic away from Benson's narrow, twisting and congested roads in the centre of the village. The Examiner of Benson's original NP recognised and endorsed this Relief Road as the 'Golden Thread' of the Plan. The proposed access point, if allowed, would create a traffic system that would encourage most drivers at peak times to turn left out of the site and wind through the village before heading out along Oxford Road or Church Road, rather than heading right to join the DWH roundabout and Relief Road (when fully open) just 150 yards NE.
- The actual position of the vehicle access point is not well defined, but the plan in the Transport Report suggests it will be only a few metres from the lower chicane near Sands Way. This chicane gets very busy in both directions at peak times and it is inevitable that drivers exiting from the proposed development at such times will be confronted by cars queueing to get round the chicane and into Benson. If they are turning left towards Benson, they will simply have to push into the queue; if they want to turn right, however, heading for the DWH roundabout and Relief Road, they will be forced to navigate across the queue in the near lane and then find a gap to turn right into the far lane, competing with all the traffic accelerating away from the chicane. As there is no room for any safety island or other measures, we do not believe this will be safe... and it certainly will not be efficient.
- The proposed access will inevitably discourage the use of the Relief Road by commuters exiting the site. It will be much simpler for them to turn left and crawl through the village towards the A4074 and Oxford or Reading beyond, thereby adding back traffic and congestion in the village centre that the NP sought so hard to reduce. The school in Oxford Road has always been a contentious, high-risk bottleneck and is certain to become even more fraught for both parents and drivers during drop off and pickup times, as impatient drivers try to get past parked cars and parking parents.
- The proposed access junction to the Watlington Road would be the eleventh such junction along a stretch of road that will be designated as 'Village only' when the Relief Road is fully open and the B4009 re-routed. There are already 10 existing junctions in the short stretch between the access proposed for this site and Castle Square ... the multiple turning points into and off this road makes driving inefficient, stressful and unsafe during peak periods, when traffic becomes very congested.

Pedestrian Routes

- The access options for the proposal site are quite tightly constrained by the neighbouring land parcels - private land to the north, housing all along Brook Street to the east and housing along Blacklands Road to the south. This renders the site curiously isolated from the village centre and makes sustainable access into the centre (and elsewhere) inefficient and unappealing. Residents will inevitably opt to use their cars.
- There are 4 pedestrian routes identified by the applicants in Image 2-2 of Transport Assessment Appendix A ('Walking Routes to Local Facilities') as providing "excellent level of walking accessibility to local facilities across Benson from the site", but the reality is that all of these routes are of poor quality and unsafe at many points. (Note the Image key designates the 4 routes 1-4, the text uses A-D; in what follows we use 1-4)
 - Route 1 to the Primary School would have children walking along the B4009, despite the fact that, for the narrow and very 'blind' 200 metre section of this road between Westfield Road and Crown Lane, this road has no pavements at all. The single pavement on the section from the blind Sun Inn corner down to Castle Square is also inappropriate, as it narrows at several points to 0.8 metres and the high hedges push pedestrians onto the road surface. There is never any room on this section for 2 walkers to walk alongside or pass each other on the pavement, let alone transactions involving accompanied children or pushchairs. The final sharp turn on entry to Castle Square requires pedestrians to walk round/over the doorstep to a cottage which has a history of being clipped by lorries. The route continues down Oxford Road, where the pavements are wider, but traffic at school pick-up and drop-off times gets very snarled, due in part to careless parking and impatient through traffic, so even this section can be hazardous.
 - Route 2 to the Coop (and the slightly extended Route 3 to Millstream Surgery) is not a single route but a set of possible route permutations. Rather than address each permutation, we would simply observe that all of them involve multiple road crossings and sections of footways that are enclosed by high fences or walls and not overlooked. The colour scheme is unclear on the start point for these routes, so we have assumed that this will be either via the cut-through path from the western edge of the site to Blacklands Road – which is an enclosed, unlit and unobserved path; or (presumably preferable for residents on the northern edge of the development) via the western exit to the site. This latter 'route' requires crossing and recrossing the Watlington Road (uncontrolled crossings) to avoid walking on the road to get to Blacklands Road – there is no pavement or room for a pavement on the nearside.
 - Other options involve use of the country footpath running along the western edge of the site down to Brook Street – this is unsurfaced, uneven and regularly becomes overgrown with bramble and nettles; the Brook Street end of the footpath is very narrow and often choked by vegetation. Alternatively pedestrians can use the high-fenced, poorly-lit and un-overlooked Renee Brogan Path down to Crown Lane; then walk up Crown Lane, avoiding the drivers using the lane as a rat run and the parked cars often on the pavement and always causing obstructions; turn right and walk the last 100m along the

High Street into the centre. In common with many of Benson's cut-through paths, the Renee Brogan Path can be quite intimidating after dark

- In summary, most of the pedestrian routes proposed for getting to village centre services are unsafe and none are appealing. The result will be that many of the residents will choose to use their cars.
- Please see [Appendix B](#) to view a supporting map of the applicants' proposed walking and cycling routes to the village centre and elsewhere

Cycleways

- Cycling is the second priority in the Government's Hierarchy of Users, after pedestrians and above public transport and shared vehicles. Private cars come last. Despite this, Benson has very few and poor cycleways – contrary to the inference of the Transport Assessment, there are no formal cycleways through the centre of Benson. The proposed development will not do anything at all to improve this situation. The applicants have proposed an internal cycleway parallel with the B4009, but the only dedicated exit point from this is at the eastern edge of the site by the chicane and, as proposed, cyclists would simply be expected to fall into the road at the point where the lines of cars will be queueing to get round the chicane. This exit is neither safe or sensible. Apart from the Emergency Access (kept locked) and the main vehicle access route (not advisable at peak times) out of the development, the only other exits from the site – both near the middle of the public footpath alongside Blacklands Road - are pedestrian only and too narrow and uneven in places to be used, even if cycling was allowed. In summary, cycling options for residents of the proposed site appear very limited and unlikely to attract many residents to leave their cars at home.
- Image 2-3 'Existing Cycle Routes' of the Transport Assessment Appendix A (Drawings) illustrates clearly that there are no appealing routes from the site to anywhere that do not require cyclists to use the B4009 at the start of their journey (and in many cases for the first mile until they hit the A4074). In peak hours, this means confronting heavy traffic (including many HGV's and articulated long vehicles) on a very crowded, winding road, with the total road width narrowing down to 4.5 metres at several points, and several completely blind corners.
- More curiously, the main routes shown in the Transport Assessment for cycling to Wallingford School (Route 1 Option 1) and to Wallingford Town Centre (Route 2 Option 1) are actually along the Thames Path, despite the fact that this section of the path (Benson to Shillingford) is a strict 'no cycling' section! It is worth noting too that the Thames Path is very uneven, particularly at the Benson end, and in winter very boggy and regularly under water for significant periods.
- The misconception above is one of many in the Transport Assessment and demonstrates the limitations of desk research when designing routes - pedestrian, cycling and vehicular – through an historic rural village. In our view, if the authors of the assessment spent enough time walking and cycling along their suggested routes, they might realise how unsustainable the proposal site really is.
- The alternative routes proposed for cycling to Wallingford School (Route 1 option 2) and Wallingford Town Centre (Route 2 Option 2) are more practical, but longer in the case of

the school and certainly not a pleasant ride. The route heads south along the Watlington Road through Benson and out on Church Road to the junction with the A4074. From here the route joins a tarmac cycleway running for 1 mile directly alongside the very busy and noisy 50mph road as far as the Recycling Centre opposite Benson Lane. At this point, the route proposed ceases to be a separate cycle route and the cyclist needs to drop onto the side of the road alongside the heavy traffic, and travel a further 0.7 of a mile down as far as the Crowmarsh Gifford Roundabout – an uncomfortable ride. From here the route into Wallingford is more straightforward but still needs care to navigate roundabouts, speed bumps, and traffic lights on the bridge and at the Castle Street crossroads. There is an alternative shorter route into Wallingford from the end of the formal cycleway and down Benson Lane, but this involves crossing the A4074 using an uncontrolled crossing with a small traffic island only deep enough for pedestrians, which some find alarming.

Harm to the edge of Benson and its countryside setting

- The Elvia outline proposal will be harmful to the landscape and Benson's rural setting. It will breach Benson's settlement boundary; replace the open green space that currently marks the edge of our rural village with a dense and dominant urbanising development; destroy the long-standing tall field hedges on its northern boundary; and obstruct or compromise the long views out to agricultural fields and the Chilterns beyond. In doing this, it will spoil yet another tract of Benson's rural setting and the edge of the village - carefully nurtured by policies in the NP - will become indeterminate and open the village to further expansion east. Our NP Vision, unchanged from the original version, starts with these words: "Benson will accommodate the level of growth required to meet our local housing needs while respecting its history and protecting its rural setting beneath the Chiltern Hills and alongside the River Thames." These words are still faithful to our intentions and our community's hopes, despite the huge amount of new housing Benson has recently accommodated, but further insensitive development beyond the boundaries now established will destroy the character of Benson as a rural village.
 - The proposed development would breach the settlement boundary established by Policy NP1 of Benson's NP, and eliminate the value of the clear settlement edges that have been set by historic development and the careful policy measures for recent development so far. These edges, and the relationship between the settlement and its rural surroundings, are important to the character of Benson as a rural village, as subject to Policy NP 28 and as set out in the Landscape Assessments in Appendix E Part 2. Sections 4 vi and vii of this Appendix note the value of this and neighbouring fields in this respect, while View 7 in Part 3 of the Appendix, looking out over the proposed site from the North end of the footpath, shows it as a field with the historic strip development of Brook Street set low down on the far south side. The southern boundary is an ancient one, marking the distinction between historic Port Hill Field and the ancient rear line of the Brook Street plots. Along the west side of the field the Blacklands Road bungalows provide a respectful low edge, while to the north the retained field hedge along the B4009 marks and contains the edge of the recent permitted development by David Wilson Homes. This application site is clearly outside these acknowledged edges and outside the settlement. It forms part of the rural setting of the village. Dense housing development here will violate the boundary and the rural character of the setting, and

is fundamentally in conflict with the NP, without any of the justifications that the SOLP looks to accommodate in its relevant policies for development in the countryside.

- In order to accommodate visibility displays for vehicles exiting the site and suitable measures for the pedestrian and emergency exits, the applicant is proposing to remove completely the majority of the long-standing field hedge on the south side of the Watlington Road and reduce the remaining (and replacement) hedging along the whole of the frontage of the development to just 0.5 metres high. This drastic proposal is in severe conflict with the NP's principle of retaining Benson's long-standing field hedges wherever possible and replacing any sections that must be removed with full-height hedging. This is particularly important here at the entrance to the village, as it is pivotal to the rural setting and character of the village. Benson's NP draws attention to the value of the existing status of the current site as a field and to its existing hedging (see Appendix E Part 2 vi and vii), and Policy NP28 of the NP requires that "*development proposals should preserve or where practicable enhance the local character of this landscape both in general and by reference directly to detailed assessments in Appendix E.*" To this end, Policy NP4 for the David Wilson Homes site opposite the proposed site requires "*Retention of the existing hedge forming the SE boundary of the site and its consolidation with a 3 metre wide landscape buffer to its immediate north subject to securing safe access and visibility*". DWH has observed this policy requirement conscientiously and has retained the vast majority of the hedging along the north side of the road. This current application makes no attempt to do this and will undermine the NP's intentions and efforts to retain the rural approach to the village. If this application is approved, Benson will present itself to everyone entering or leaving the village as a large suburban sprawl.
- It is important to note that all the policies in Benson's original NP took their direction from the views expressed by the community. The detailed questionnaire we conducted demonstrated that the community's number one strategic priority for Benson was that it should retain its rural character and setting. 92% of the 546 respondents to the questionnaire said they valued Benson's rural landscape and easy access to the countryside highly and just 3% saw little or no value.

Green buffers will not compensate

- Where development has been permitted, NP Policies 2,3,4, 22 and 29 have ensured that broad green spaces and buffers separate all new housing from the countryside, while allowing and encouraging access to it, and providing for wildlife and biodiversity. Ultimately, for the people of Benson, the green buffers enshrined in our carefully designed NP are far more than screens for development, or theoretical strips of unused land set aside on the edge of a dense development - they are green open spaces bordering open countryside, through which everyone can walk, from which they are able to appreciate views of the agricultural land beyond, and about which they can say "The village ends here".
- The applicants' Illustrative Strategy proposes a 'native woodland buffer' of about 20 metres depth with no detail provided at this outline stage. It is not possible to tell how this would attempt to meet our NP's expectations. While the NP requires vegetated buffers with trees and hedges, we note that Benson's edges are not generally 'woodland'. We

fear that the space, and its quality as green space, would come under pressure to accommodate requirements for other facilities (play provision, SuDs, parking, etc.) given the proposed density of development and minimal provision. Even if appropriate detail can be agreed, it certainly represents very poor recompense for the countryside setting that Benson will lose if this development is allowed.

For the many reasons given above, Benson Parish Council is clear that this opportunistic application is inappropriate on this site in the countryside beyond Benson's boundary. The application is in direct conflict with many NP policies and the access proposed is clearly unsustainable. Benson has already played a major part in supporting the need for more housing in South Oxfordshire and needs time to accommodate the impacts of this. Our whole community is united in opposition to the Elivia proposal – witness the volume of objection comments and letters of Representation on the SODC planning website. We therefore ask SODC to refuse this application.

Appendix

For completeness, here is a more detailed commentary on each of the pedestrian and cycling routes proposed in the outline proposal:

Walking Route Audits Annex C Section 2

Note – Image 2.2 of TA Appendix A (page 10) shows a different Route 1 to that shown in the Transport Assessment Image 3-3 (page 16). The section on Pedestrian Routes above assumes that Image 2.2 of Appendix A is the intended route; this detailed commentary addresses the Walking Route Audits in Annex C.

Walking Route A – To Primary School. In this section it states that “the most direct route between the site and Benson Primary School is via a paved link along the central western boundary of the site, connecting to Blacklands Road”. This route utilises a footpath that leads out onto Blacklands Road near to the junction with Newton way and requires pedestrians to cross 7 busy residential roads with only one controlled crossing (a Zebra crossing on the Watlington Road). The footways are only 1.5m wide in many places’ with no tactile or turned down kerbs at crossing points.

The proposed alternative route available via the northern site access has limited footways and in places requires pedestrians to share the space with vehicles, wholly unacceptable for school children.

Walking Route B & C – To Nearest Supermarket & Healthcare. The proposed ‘most direct’ route via Watlington Road and continuing south via Westfield Road, to Westfield Close & Aldridge Close, requires pedestrians to cross the Sands and Watlington Road twice as well as crossing over two road junctions before accessing the footway onto Westfield Road.

Walking Route D – To Nearest Bus Stop. A straightforward route accessing Blacklands Road from the site’s central access point with a single bench seat at the junction of Blacklands Road and Brook Street. This Bus Stop serves the No.33 hourly bus service to Abingdon and Henley with the last buses arriving/leaving Benson between 19:30 and 19:45, the No. 33A bus runs once a day from Benson to Henley Railway Station.

Walking Routes to Nearby Facilities – Figures Section: Reference: ITL200174

This drawing shows walking routes from the site to the Primary School, Nearest Supermarket and Healthcare and the nearest Bus Stop.

All these routes require pedestrians to cross the Sands / Watlington Road twice from the site, as there is NO direct Footway from the site to the Blacklands Road or Westfield Road. The strip of land along the Watlington Road just outside the site entrance is very narrow and the width is completely inadequate for a footway.

All of the proposed crossing points are shown as ‘Uncontrolled’ crossings with Tactile Paving. There are no proposals to improve the footway width along any of these

routes. In particular, the footway alongside Watlington Road from Chapel Lane to Castle Square.

Cycle Routes to Nearby Facilities – Figures Section: Reference: ITL200174

There are NO formal cycleways from the site through the village to the A4074, it is only on arriving at the A4074 that a shared Pedestrian/ Cycle Path alongside the A4074 becomes available, which only runs as far as an uncontrolled crossing on the busy A4074, which leads to Benson Lane and a cycle lane into Wallingford Town centre. The island in the middle of the uncontrolled crossing is only deep enough to accommodate pedestrians. There is no continuation of the shared Pedestrian/Cycle path along the A4074 beyond this point.

Other comments

To the Northern end of the proposed site there is a short 125metre cycle lane from the site onto the B4009 (The Sands). At present it is little used as it is short and does not yet connect to any extended cycleways.

Para 3.5 states “Watlington Road is lightly trafficked with low vehicle speed and therefore suitable for cycling.” This is not a true reflection of the Watlington Road, especially between Westfield Road and Crown Lane.

Para 3.9. says “an alternative route is available via the Thames Path public right of way, which provides a largely traffic-free connection.” The Thames Path is designated as a public footpath, not a bridleway or cycle path and cycling along it is not legally permitted.

APPENDIX B- If you click on the map link, a presentation appears. Click on the 'Present' button and a map with red arrows will show. Clicking on any of the arrows will bring up a photograph reinforcing the issues we have identified with the applicants' routes.

 [Benson Walking Routes_Elivia Homes_Read Only_Show.ppsx](#)