

Planning Application - 11/01837/OUT

Statement of objection on behalf of

Bidford-on-Avon Parish Council

Outline application for mixed-use development comprising demolition of existing dwelling (18 Salford Road), erection of up to 137 no. dwellings and new medical centre. Provision of access road and associated public open space

At

Land to the rear of 18 Salford Road,

Bidford-on-Avon, Alcester, B50 4EN

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APS Avon
Planning
Services



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Introduction

Avon Planning Services (APS) has been instructed by Bidford-on-Avon Parish Council to undertake a review of planning application 11/01837/OUT submitted to Stratford-upon-Avon District Council on 11 August 2011.

The comments made in this statement are based on the plans and documents submitted to the District Council on 11 August.

This development represents one of the largest and most important developments the village has seen for a number of years and is likely to be the largest development to take place in the village during the lifetime of the Core Strategy once it is adopted. For these reasons, the Parish Council felt compelled to seek professional independent advice in order to inform themselves and aid the District Council in the determination of the application.

Policy and Principle of Development

The Parish Council would submit a strong holding objection to the principle of the development of this site at this current time.

The site is not allocated for development in the Stratford-on-Avon District Local Plan Review 1996-2011. The site lies outside of the built up area boundary as indicated on inset map 2.2. The proposed development therefore fails to accord with the provisions of saved policies STR.2 and STR.4 of the Local Plan Review.

The Stratford-on-Avon District Local Development Framework - Core Strategy Consultation (February 2010) allocates land north of Salford Road under proposal BID.3. Proposal BID.3 seeks to deliver about 75 dwellings on 3.7 hectares of land under phase II of the strategy i.e. beyond 2016.

The proposed development seeks 137 dwellings on 6.6 hectares of land. The proposal is therefore not in accordance with the emerging Core Strategy allocation. Moreover, it represents a significant deviation from this proposal being nearly twice the size in the allocation.

The Parish Council have attended workshops and made representations to the District Council (Paul Harris) on the emerging Core Strategy over the past few years. Copies of this correspondence can be provided upon request.

The February 2010 Core Strategy consultation outlined the RSS panel's recommendation for 10,500 dwellings across the district up to 2026. However, on 5th September 2011 Stratford-on-Avon District Council agreed a revised housing figure of 8,000 dwellings for the LDF period 2008-2028. This revised figure represents a reduction in 2,500 dwellings and an increase in the plan period by 2 years (up to 2028).

Stratford-on-Avon District Council will be publishing a third Core Strategy consultation in January 2012 which will take account of the reduced housing figure. It is reasonable to assume that the number of allocations and the number of dwellings in those allocations will be revised and more likely reduced to take account of the reduced housing figure. The more dispersed approach to housing allocations across the district will also have a bearing on these allocations.

The Parish Council would therefore strongly contend that the proposed application is premature and should not be determined favourably until such time as the appropriate and necessary consultation and independent examination has taken place. A development of this scale is considered to be a strategic allocation for a village the size of Bidford. The proposed development, if approved in advance of the Core Strategy, would significantly undermine the Development Plan process.

The Parish Council is aware of the requirements in paragraph 71 of Planning Policy Statement 3: Housing which requires Local Planning Authorities to consider applications for housing more “favourably” to assist in reducing the housing land supply deficit, even if this is against Local Plan policies.

The Parish Council is also aware that Stratford-on-Avon District Council cannot demonstrate a 5 year housing land supply at the current time and that the deficit (approximately 1.6 years) could arguably be considered significant.

However, despite the Council’s 5 year housing land supply deficit, paragraph 69 of PPS3 states that other factors should be taken into account before determining applications for residential development:

- Achieving high quality housing
- Ensuring developments achieve a good mix of housing reflecting the accommodation requirements of the community;
- The suitability of a site for housing, including its environmental sustainability and
- Using land effectively and efficiently.

When determining planning applications for residential development where the council does not have a 5 year housing land supply, the benefits of the development and its contribution towards meeting the supply deficit must be balanced against the criteria in paragraph 69 of PPS3 and other material planning considerations. It is acknowledged that a development of 137 dwellings would make a valuable contribution towards meeting the Councils housing land supply deficit.

It would appear that the applicants rely almost entirely on the Councils 5 year housing land supply position in the promotion of their development. As we have already established it does not accord with either the saved policies in the adopted Local Plan or the emerging Core Strategy allocation.

The Parish Council submit that the proposed development would fail to comply with the criteria outlined in paragraph 69 of PPS3 for the reasons outlined elsewhere in this report.

The draft National Planning Policy Framework (NPPF) was published by the Coalition Government for consultation on 25th July 2011.

The draft NPPF contains a number of references to the presumption in favour of sustainable development and the need to support economic growth through the planning system.

The presumption in favour of sustainable development is central to the policy approach in the framework, as it sets the tone of the Government’s overall stance and operates with and through the other policies in the document. Its purpose is to send a strong signal to all those involved in the planning process about the need to plan positively for appropriate new development so that both plan-making and development management are proactive and driven by a search for opportunities to deliver sustainable development, rather than barriers.

Despite this being only a consultation draft, Inspectors have been advised that it gives a 'clear indication of the Government's direction of travel' and as such is capable of being a material consideration. It is for Inspectors, and therefore Local Planning Authorities, to decide on a case by case basis what weight should be given to it, and consider its relevance to the issues.

The Parish Council is of the view that the scale and magnitude of the proposal would not represent sustainable development due to the site being located outside of the built up area boundary of the village. Furthermore, there are limited economic benefits, other than through construction, (the provision of the Medical Centre is considered later in this report) in the proposed development. The proposed development would therefore appear to be at odds with the draft NPPF, whatever weight it is given.

Part of the Parish Council's objection to the redevelopment of this site for housing stems from local knowledge that there is no evidence to suggest there is a need for a development of this scale to meet the needs of the local community in the parish or the village. Furthermore, the Parish Council has made repeated representations to the District Council regarding the declassification of the village of Bidford-on-Avon to a Local Centre Village from its current artificially inflated status of a Main Rural Centre.

Over a number of years the village has seen a general decline in the number of shops and services it has to offer. For example, the High Street is now dominated by non-retail uses. The village has seen a disproportionately large amount of residential development over the last 20 years without any investment in local facilities or services. This has led to the birth of a commuter village and the demise of traditional village life. The proposed development would appear to continue this trend.

Notwithstanding the principle of the development, the Parish Council would raise objection to the proposed development on the following additional grounds:

- Impact on Infrastructure
- Increased Traffic & Highway Matters
- Flooding and Drainage

Impact on Infrastructure

Schools

The Parish Council is aware that there are existing capacity issues at the primary school. Parents in the village cannot currently get their children into the school which indicates a real and concerning problem. When parents are unable to matriculate their children at the local school they have to transport them, almost always by the private car, to schools outside the parish thereby increasing their carbon footprint with its known adverse environmental effects.

Unlike other Main Rural Centres such as Alcester, Studley, Southam and Wellesbourne, Bidford does not have a high school. All children in this age group have to commute outside the village to attend high school. The proposed development would add to this commuter traffic and increase the unsustainable nature of the development.

The proposed development would need to mitigate against the increased demand on school places. The Parish Council would be interested to hear the view of the Local Education Authority on how they feel the development would impact upon the existing school and how this could be mitigated. The Parish Council would submit that the mitigation must be deliverable.

The Parish Council reserves the right to make further comments after discussions with the Local Education Authority.

Shops & Community Facilities

Over the years as the village has grown the level of infrastructure has not grown with it. The village has a limited number of facilities and services when compared to the number of residential properties. Additional large scale residential development without appropriate investment in infrastructure would continue this trend.

Of the remaining few facilities left in the village, the youth club is currently threatened with closure due to a lack of financial aid and expensive repair bills and ongoing costs. The library will also soon have to close unless community funding can be found because the County Council is no longer able to offer financial assistance.

The Buy in Bidford Group (BiB) consisting of local businesses was set up to raise the profile of the High Street. Ironically, the relocation of the medical centre will reduce the footfall through the High Street thereby worsening the situation.

Medical Centre

During pre-application discussions with the applicant the Parish Council outlined the need for a new medical centre in the village. At that time there was some doubt over the deliverability of the proposed medical centre on Friday Furlong. However, since those discussions the pending application on Friday Furlong (ref. 09/00247/OUT) has been granted planning permission. This proposal includes a new medical centre, which the existing village practice is committed to. Therefore, there is no need for the medical centre on the proposed site.

The Parish Council would request that S106 contributions are made available towards community facilities such as the youth club and the library, should planning permission be forthcoming.

Increase in Traffic & Highway Matters

It is an undeniable fact that the B439 Salford Road is an extremely busy road at peak times and a generally busy road outside those times. The proposed development would exacerbate this situation.

The Parish Council maintains that since there is limited (and declining) employment opportunities within village, the occupiers of the new development would be almost totally reliant on the private car for commuting to places of work. As previously discussed it will also be the necessary for children to commute to and from schools outside of the parish thereby increasing traffic movements.

The accident records obtained by the applicant stop at 2009 and there is an assumption in the TA that there have been no accidents since 2009. A TA based on assumptions is untrustworthy and unreliable. Up to date information should be sought from the Highway Authority.

The traffic data obtained is fundamentally flawed. It does not take account of the committed residential development at Friday Furlong. When this is built and the dwellings fully occupied, the level of traffic using the B439 will be significantly higher than at present. The TA must be revised to take account of the cumulative impact of Friday Furlong and the proposed development.

The TA does not take account of the gradient of the Salford Road and the position of the proposed access at the bottom of Marriage Hill. The transport consultants, being based in Bristol, do not have the benefit of local knowledge which demonstrates that traffic speeds are generally high as vehicles descend the hill and vehicles leaving the village in a westerly direction increase their speed as they reach the bottom of the hill in preparation of ascent of the hill. This is fact. Placing an access serving a development of this magnitude in this location is likely to significantly increase the risk of accidents and reduce highway safety.

The Parish Council would question the suitability and practicality of the proposed emergency access from The Meadows and Queensway. Emergency vehicles will struggle to navigate around these narrow residential roads. A more direct emergency access is required.

Paragraph 5.5 of the TA fails to acknowledge the distance of the high school from the site and the impact that additional vehicles will have on the local highway network at peak times as a result of the need to travel outside of the parish to access the high school.

The TA suggests that the proposed residential development would generate 162 trips during the 1 hour am and pm peaks. The Parish Council would respectfully suggest that this figure has been grossly underestimated given the tendency for rural villagers to rely on the private car. It is suggested that a more realistic figure would be double that which is published in the TA.

Interestingly paragraph 6.10 of the TA acknowledges the proportionally low number of pedestrian, public transport and cyclist trips associated with the development. The Parish Council would tend to agree with this.

The comments of the Highway Authority will be fundamentally important in the consideration of this application. The Parish Council would reserve the right to comment further following discussions with the Highway Authority.

Drainage and Flooding

The drainage strategy submitted by the applicant admits that no site investigations have been undertaken (paragraph 2.9). However, the underlying soil type is unsuitable for soakaways therefore appropriate measures must be taken to resolve surface water drainage.

The drainage strategy speaks of attenuation ponds as a means of sustainable drainage capture on the site yet these fundamentally important features are completely absent on the submitted master plan. However, it does appear on the submitted landscape strategy as an area of wet attenuation along the southeastern boundary of the site adjacent to existing residential properties.

It is unclear whether this pond will provide the necessary sustainable urban drainage on the site to achieve greenfield 'run off' rates. The design and capacity of the pond must be assessed by the Councils engineers to ensure that it is fit for purpose.

The Parish Council is aware that the site and the surrounding residential roads flooded in July 2007 and Easter 1998. Queensway has historically suffered from surface water flooding since Scott Close was built in the mid 1990's (Ref 94/00708/FUL) despite reassurances at that time that the proposed drainage measures would adequately deal with surface water flooding issues. It is imperative that the same does not happen again.

Summary of Objections

The Parish Council objects to the proposed development on the grounds that the scale of the development is not commensurate with the needs and service facilities of this modest rural village. The proposal fails to comply with adopted Local Plan policies and would fundamentally undermine the strategic objectives of the Development Plan process through prematurity.

A holding objection is submitted against the principle of the development until such time as the revised Core Strategy is published, publically consulted upon and independently examined by the Inspector.

Notwithstanding the principle of the development, the Parish Council would raise objection to the detail of the proposed development on the following grounds:

- The proposal would have an adverse impact on existing limited infrastructure within the village such as the school. Should planning permission be forthcoming S106 contributions should be provided to mitigate the additional pressures on school places. Furthermore, and without prejudice, the Parish Council would request that S106 contributions be made towards youth and library facilities in the village;
- The increase in traffic through the village would be significant and the assessment submitted by the applicant have a number of failings including the lack of reference to committed developments elsewhere in the village. The position of the access is deemed inappropriate and unsafe given its proximity to the base of Marriage Hill and traffic speeds;
- Surface water drainage has not been satisfactorily addressed given the known ground conditions and limited information obtained by the applicants. There are existing problems with surface water flooding in the vicinity. The proposed development fails to demonstrate that the proposed sustainable surface water drainage can be satisfactorily delivered and existing problems not exacerbated.

Conclusion

Bidford-on-Avon Parish Council, with the support of the residents of Bidford, respectfully requests that planning permission be refused and the rural tranquillity of this village be preserved by a more appropriate scale and form of development at a more appropriate time.