

Reference planning application 17/00936/FUL - Land to the North of Sherfield Road, Bramley

To whom it may concern.

Below is Bramley Parish Councils response to the above application complete with appropriate attachments.

The original application was 15/02708/OUT: an outline application for 50 dwellings on this site. The Parish Council raised concerns over flooding, providing the data from an independent survey. We also stated that there was/is not a local need for the 20 additional social and affordable dwellings that result from development. There are very real issues regarding the volume of traffic passing along the C32.

The Parish Council commissioned independent surveys on both traffic and a flooding last year. The relevant results of these are addressed in this communication and the attachments.

There are many inaccuracies in the new application (17/00936/FUL) and associated studies and conclusions, and the Parish Council is very concerned that some of these inaccuracies are fundamental.

The Parish Council are aiming to present you with the true and correct detail generated recently, and give reasons why the application should not be approved.

This application quotes throughout that it is in accord with outline planning permission for 50 houses 15/02708/OUT. The PC feels that this is misleading.

The Design and Access Statement and the covering letter with the application states that the “development of the site is acknowledged in the Bramley Neighbourhood Plan (NP) and forms part of the 200 at least as required in the Local Plan.” This is in paragraph 6.12 of the Neighbourhood Plan, but is completely misquoted in this application.

The views of the community were from a survey quoted in paragraph 6.10, that the majority did not want housing development on sites to be more than 50 houses. This was quoted in the pre-submission NP but the external examiner requested this be taken out and replaced with the wording below:

- Policy H1: New Housing Development.
New Housing Development outside the Policy Settlement Boundary will only be supported if it is in accordance with the relevant Local Plan Policies for new housing in the countryside.

In the Local Plan this is:

- Policy SS6: New Housing in the Countryside
Development proposals for new housing outside the settlement policy boundary will only be permitted where they are:
 - e) small scale (4 dwellings or fewer (net)) residential proposals of a scale and type that meet a locally agreed need.

Paragraph 6.12 quotes the “fait accompli” that Bramley was faced with at that time, no NP, no Local Plan, with 200 houses at Minchens Lane, 50 houses on Land north of Sherfield Road, 65 houses on land adjacent to The Street, and 15 houses on the Royal British Legion site. This was all in addition to 460 houses in Cufaude Lane at Razors Farm, which met easily the “200 at least”. Not the choice of Bramley residents.

There is no mention throughout the application of Policy H1 in the Neighbourhood Plan.

To say that there is “flexibility” in achieving the 200 at least regarding the 50 being increased to 55 houses is wrong. The 330 agreed by BDBC is enough flexibility!

Affordable housing - contributing a further 2 affordable houses for Bramley is unnecessary. With the 330 houses already approved the needs for Bramley have been more than met at 40%. Yet again it appears that Bramley is already contributing to the wider Borough need without regard for the adverse impact on the Bramley community. The figures in the NP state that the requirement in Bramley at the time of producing the plan (2016) for those people that have a local connection was 33 households. Policy H2 of the NP states that “occupancy of all affordable homes will be prioritised for households with a local connection with the parish of Bramley, as defined by the Basingstoke and Deane Borough Council housing allocation scheme and any relevant planning policy guidance”

The 200 houses at Minchens Lane at 40% gives 80 affordable homes, the 50 houses as agreed in the original outline planning permission for Land north of Sherfield Road gives 20 affordable homes, and the 65 houses for The Street gives 26 affordable homes. The extra 2 suggested as a result of increasing to 55 is irrelevant.

As reported in 2016, there were 45 homes requesting home swaps, with 23 located on the German Road Estate, the newest estate which accommodated residents from Popley. Social housing tenants in Bramley want to get back to Basingstoke. Facilities available in Bramley and financial considerations do not make Bramley a viable location for these tenants!

The density of housing is quoted as 28 dwellings per hectare, and is higher than the surrounding area. Strawberry Fields bordering the site is 24.5 per hectare; The Smithy/Farriers Close opposite the site is 17.4 per hectare. The proposed increased density is not in keeping with the area.

Transport - there is going to be increase in traffic with the extra housing. This will contribute to the already unacceptable level of traffic on the C32 and the congestion throughout the village as a result of railway level crossing down time (see traffic study comment later in this communication).

Quoted within the application is the statement that the “National Cycle Route No 23” runs along Sherfield Road directly south of the site through the village. The cycle route runs partly along The Street from Cufade Lane to go up north along Minchens Lane. This is nowhere near this site!

Facilities - there is no Public House in the Conservation Area near St James Church, as stated in the application.

Conclusion - whilst the outline application for 50 houses was approved by BDBC against the wishes of the Parish Council and residents of Bramley, to allow permission for this application for 55 houses against the original outline approval is not acceptable.

More social/affordable houses are not required in Bramley.

The Neighbourhood Plan does not acknowledge this site, but quotes the fait accompli.

The density is greater than surrounding areas.

The design needs to improve with softer rooflines to fit in with the area.

If this application is allowed to be approved with the NP “made” at the full Borough Council meeting on 30th March 2017 and commended by the Portfolio Holder to sit by the Local Plan, then BDBC are

not abiding by their support for Neighbourhood Planning which reflects the wishes of the Community.

Transport - Bewley have submitted a rebadged Transport assessment in 2 Volumes. All the core elements of the 2015 assessment have been reused for the 2017 assessment for 55 dwellings.

Points to note:

- Section 4.2.3 discusses the merits of the pedestrian refuges on the Sherfield Road in the vicinity of the site. These refuges offer little protection and are actually too small for a standard sized pushchair.
- Section 4.3.1 states that many residential roads and lanes in the village of Bramley are lightly trafficked and suitable for cycling. The independent transport survey of 2016 (attached) does not back this up. The application has no provision for sustainable non-motorised transport options.
- Section 4.5.4 indicates existing traffic flows dated back to surveys in 2014. The Parish Council have conducted an independent Highways approved survey of traffic flows within Bramley Parish. The surveys were conducted over a 7 day period with electronic and ANPR Highways Agency approved equipment methods, and indicates that the figures used in the Transport Assessment are 42%, a considerable volume of additional traffic for a 'C' rural road.
 - The 2014 data indicates a northbound flow along Sherfield Road of 2275, yet the independent survey data of 2016 backed up by ANPR cameras shows 3241.
 - The 2014 data indicates a southbound flow along Sherfield Road of 2172 yet the independent survey data of 2016 backed up by ANPR cameras shows 3193.

The core set of figures collected by the independent consultants are attached. The calculations take into effect all the other Bramley developments and their impact on the C32 and the Level Crossing, the Bewley submission does not.

- The submitted traffic assessments make no provision for any 'Safe routes to school' for any children living on the proposed development.
- Table 6.1 indicates options for non-car modes and that the following locations are considered within reasonable cycling distance; Sherfield School, Sherfield-on-Loddon Post Office. All Sherfield locations require the cyclist to use the C32, which is already indicated with a daily traffic volume exceeding 6000 cars and no dedicated cycleway, and must be considered unsafe for children or even adults to risk cycling.

Therefore, the Parish Council reject the submitted Transport documentation from Bewley Homes as valid and up to date documentation.

Flooding - Attached is the final report by the consultants, so in terms of the flood assessment the Parish Council have looked at the site overview for the original 50 and the new 55 homes, and Bewley are correct in that they are using exactly the same layout.

However, the flood assessment they have submitted is the original one back to 2015. As you can see from the attached drainage image almost all of the open space areas for the application lie in flood zones 2 and 3. Bewley have also included a flood assessment addendum. However, there is serious error in this addendum in referring to the application being located in the 'Anglian River Basin District.' This is wholly incorrect and therefore all associated fluvial allowances and the flood zone extents in this addendum are incorrect. The application is located in the Thames Basin District

(image attached). The Planning Officer should request the correct flood risk assessment addendum to be submitted based on the correct UK river basin district.

The PC also disagrees with the statement in the addendum concerning finished floor levels. The Bewley consultants quote Environment Agency guidelines being 300mm; however, our consultants have advised the following:

- "In accordance with standard Environment Agency requirements, the finished floor level of the proposed dwellings should be set at least 0.6m above design flood level which as discussed under the 1 in 100 year scenario (1% annual exceedance probability) fall from 56.70m AOD (upstream) to 56.55m AOD central and 56.33m AOD on the downstream site extents. These levels will increase over time with increased river flows resultant from climate change and so should be considered by the applicant."

The Parish Council therefore believes that the proposed 0.3m level is insufficient protection due to the lack of accuracy and proximity to flood zones 2 and 3 for the dwellings.

Thames Water have indicated no objection to sewerage capacity to this new application. For their benefit, they have increased the sizes of the SUDs, but these are mainly to cope with the revised EA predictive figures for surface water and storm events

Our overall conclusion is that this application be rejected.

Bramley Parish Council.