

PLANNING APPLICATION 15/02708/OUT

LAND TO THE NORTH OF SHERFIELD ROAD, BRAMLEY, HAMPSHIRE

BRAMLEY PARISH COUNCIL COMMENTS ON OFFICER'S REPORT

Bramley Parish Council and the community are very disappointed with the Officer's recommendation that this application be approved. This recommendation has been made in spite of overwhelming valid objections regarding the impact on the local community.

The greatest weight given by the Officer in the reasons for recommending approval is given to the inability of Basingstoke and Deane Borough Council to demonstrate a five year housing land supply. The Officer's report returns to this one point many times and lists many examples of planning applications which have gone to appeal and been allowed because of this lack of a five year land supply. In the closing part of the section on 'Housing Land Supply Position' the Officer makes the following statement; "In light of all the recent major residential planning application appeal decisions.....a refusal on these grounds would open the council up to a costs application on this ground alone". The community consider this stance to be weak and we expect the Borough to defend Bramley from inappropriate and unsustainable development rather than opening the door to uncontrolled and unplanned development throughout the Parish. It is clear that the Borough would set a very perilous precedent for Bramley, and indeed the entire Borough, if it this approval goes ahead. It leaves every green field in Bramley with no defence against development applications until the local plan is adopted, a prospect which is still many months away. A very good example of this is referenced within this report in the section on 'Response to Other Matters Raised in Representations' which states ".....that the applicant is pursuing this land as part of a larger site as a housing allocation site as part of the emerging Local Plan". This was reviewed by the Inspector under the Omissions Sites Submissions. The Officer goes on to say that ".....approval on this site would be a material consideration with any future planning application on the larger site".

As can be seen in the report, the Parish Council and many others submitted considered and relevant objections to this application which have all been disregarded by the Officer in the recommendation for approval; in particular we take issue with the following:

1. Under the 'Planning Policy' section the Officer states ".....this application must be assessed against the Development Plan which comprises the saved policies of the BDBLP 1996-2011." Policy D5 of the plan, as referenced in point 1 of the Parish Council's response to the application, states that Bramley has ".....the potential to accommodate additional development within its boundaries [Settlement Policy Boundaries] without encroachment into the open countryside.....". The Officer's report dismisses this in the 'Principle of

development' section with an unsupported statement that this policy and settlement policy boundaries are out of date, in fact Bramley's settlement policy boundary relative to this site is up to date.

2. References by the Officer to housing need being a justification for approval are flawed as the approval of the Minchens Lane site alone more than meets the acknowledged housing need in Bramley Parish. The S106 agreement for this site states a total of 53 in housing need and 26 requiring transfers which is already included in the Minchens approval. When the Officer refers to housing need in the "area" this is clearly not referring to Bramley's need but to the wider Borough. The development known as 'German Road' had a social and affordable build in excess of 40% which was primarily used to accommodate those in housing need from elsewhere in the Borough. It is a fact that integrating such a significant change in the village demographics is continuing to prove very difficult with current residents complaining that Bramley is unsuitable to meet their social and economic needs.
3. Having dismissed Saved Policy D5 (point 1 above) the Officer then deems it relevant in assessing the application under the section 'Sustainable Development'. The Parish Council's earlier response clearly demonstrates that this development would not contribute positively to Bramley either economically, socially or environmentally and therefore we would contend that both under the NPPF and the Local Plan, this is demonstrably not a sustainable development. This development would not add any long term employment opportunities and the statement in the report that it would "have a positive impact on economic sustainability" is without foundation. Regarding the impact on social sustainability (as defined in the report) this is in fact negative (see comments re social/affordable housing above). From an environmental perspective the Officer assess the site regarding accessibility to employment, education, etc. by a choice of attractive means of transport other than private car. The reality of life in Bramley as recorded in the 2011 census is that 74% of people travel to work by private vehicle. It is also a fact that the majority of children in secondary education have to travel to school by road. This site is therefore unsustainable as measured by the opportunity to travel to work or school etc. other than by private vehicle. Quality of education also cannot be ignored in assessing the sustainability of a community, and it is a fact that despite expansion of the local primary school the education standards have been consistently below acceptable standards since the last significant development in Bramley.
4. With reference to the assessment of 'Flood Risk and Drainage', again the recommendation is flawed. The entire site is frequently observed to be saturated or flooded, and this extends to the C32 and the adjacent existing Strawberry Fields development. The photographs attached to this response

irrefutably demonstrate the severity of the issues. The photographs taken of the current Strawberry Fields development show significant flooding even in summer months, this development would also have claimed that mitigation had been put in place and clearly this is not effective. The proposed landscaping and open space provision is all in flood Zones 2 and 3 and the Officer, whilst stating that the open space is generous also states that for some of the year the majority of the area would be unusable due to saturation and flooding. It is therefore a very hollow offer to the community as an open space and play area resource.

5. The 'Reasons for Approval' part 3 acknowledges that the proposed development would have an impact on the scenic quality of the area. Turning open green fields into housing is the worst impact possible for the community. The 'mitigation' proposed merely seeks to hide the development from view from the C32. The BDBC Planning and Development Manager has recently published, related to another green field site in Bramley, that "Due to the fundamental nature of the change proposed – from field to housing, it is unlikely that mitigation measures, or design quality, could reduce or compensate for the harm which is expected", he concludes that he would not recommend that green field site for development on those grounds and this surely can equally be applied to the site in question here (see document from M Townsend attached).

Part 4 of the 'Reasons for Approval' concludes that ".....the proposed development would have no adverse harm on the setting of the Bramley Green Conservation Area", this is untrue as the setting of the Conservation Area is all the agricultural land to the north of the C32. Additionally and of great further concern the Officer's report acknowledges the applicant is pursuing this land as part of a larger site and this would have a very considerably damaging impact on the Conservation area and its setting. Approval of this development is very likely to be the key to unlocking further development along the north side of the C32.

6. Part 6 of the 'Reasons for Approval' discusses the benefits provided by the Section 106 agreement. It allocates £77K towards a £180K project for the Village Hall. The Village Hall Treasurer has no knowledge of such a project. Also the S106 states that this is the 1st obligation to be pooled to this project with suggested predetermination that more development will occur to fund the balance of the project. A further allocation of £219K is made to Bramley Primary School; reference point 3 above it can be seen that merely expanding the school to accommodate numbers does not lead to an acceptable quality of education. We have addressed the affordable housing aspect earlier in the application. The final distribution of S106 to Bramley Football Club benefits a minority of the community and with a contribution of just £30K towards a

project of £255K how is the balance to be found?

7. In the section entitled 'Prematurity', the Officer uses the assessment of sustainability as justification to declare that the adverse impacts do not outweigh the benefits. In point 3 above and comments submitted in response to the application we demonstrate that this is not a sustainable development and has no benefits to Bramley. Therefore, under para. 1 in the Prematurity section it is clear that the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits. In response to para. 2 this development is indeed so substantial, and its cumulative effect so significant to Bramley, that to grant permission would undermine not only the current local plan but also the emerging local plan and the emerging neighbourhood development plan. It could be argued, as demonstrated by the Officer's report that the Borough's failure to demonstrate a five year land supply based on the current emerging local plan house numbers is predetermining the outcome of this and other applications.
8. In the section entitled 'Neighbourhood Planning' it must be noted that the plan is in fact well advanced contrary to the conclusions drawn.
9. Regarding the 'Highway Assessment' the Parish Council expressed its concerns in points e) f) and g) of the original Parish Council response. We would restate here our concerns particularly regarding the access in proximity to a blind bend, pedestrian crossing points and several other accesses onto the C32 in the vicinity. In the section entitled 'Impact on heritage assets' the Officer points out that the bend in the road also reduces visual impact/relationship [of the proposed development], which confirms the Officer's understanding that the development is just beyond this blind bend.
10. In the 'Conclusion' section the Officer notes that the Borough Council are experiencing a substantial need for affordable housing in the Council area. With Bramley meeting its own needs through the Minchens Lane development all the affordable housing resulting from Razors Farm and the likely Upper Cufaude Farm developments will mean that the Parish is contributing significantly to meeting the overall Borough needs.

In addition I quote our MP from a mail to BDBC's Chief Executive saying "Further, an emerging Local Plan has weight in the planning process, as does an emerging Neighbourhood plan. Bramley is producing the latter, so the intention of these documents should be respected by the planning process.". The Officers report includes statements which are in direct contradiction to our MP's statement.

In a letter to me (Tony Durrant) dated October 22nd 2015 our MP also stated that

“I have met and written to the Chief Executive of Basingstoke and Deane Borough Council on this matter, with particular concern to Bramley and my belief that the 200 home NDP allocation is met by the proposed 200 houses at Minchens Lane.”.

It must also be noted that in addition to the 200 homes on Minchens Lane five properties have been built at Bulls Down Farm along with a number of infill buildings plus a proposal to build more homes on the vacant Royal British Legion site. As you can see Bramley Village is already contributing in excess of 200 dwellings to the Borough's needs.

In conclusion this site is demonstrably unsustainable in itself, and if considered in the light of the cumulative effects of development in Bramley since 1981 it should under no circumstances be approved. The Bramley community expects its Borough Council to robustly reject this application, and to strongly defend that entirely supportable position should it go to appeal.

BRAMLEY PARISH COUNCIL NOVEMBER 2015