

# Comments for Planning Application 17/P/5545/OUT

## Application Summary

Application Number: 17/P/5545/OUT

Address: Land Off Bleadon Road Bleadon North Somerset

Proposal: Outline planning permission for the erection of up to 200 dwellings, a Health Centre, a Doctors Surgery, retail outlets and office/employment space with all matters reserved for subsequent approval

Case Officer: David Tate

## Customer Details

Name: Mrs Marian Barber

Address: Coronation Hall, Coronation Road, Bleadon BS24 0PG

## Comment Details

Commenter Type: Parish Council

Stance: Customer objects to the Planning Application

Comment Reasons:

- Affect local ecology
- Conflict with local plan
- Inadequate public transport provisions
- Increase danger of flooding
- Increase in traffic
- Out of keeping with character of area
- Over development
- Strain on existing community facilities
- Traffic or Highways

Comment:BLEADON PARISH COUNCIL: Response to planning application 17/P/5545/OUT  
Objection Part 1

## Summary

At Bleadon Parish Council's meeting on 4th May 2018 the Council resolved to object in the strongest possible terms to this planning application.

The objections are presented as follows:

Document 1 - this summary.

Document 2 - a comparison of the proposed development matched against the planning policies contained within the Core Strategy of North Somerset Council. It is noted that, in some instances, there is so very little detail contained within the application that meaningful comparison is inhibited.

Document 3 - A commentary on the proposed development as submitted to NSC which highlights errors and inconsistencies contained within the planning application. These fundamentally weaken

the case in favour of the development and cast doubt upon the accuracy and veracity of the claims made by the applicant.

Document 4 - A summary of the objections raised by Parishioners. There are in excess of 300 comments posted on NSC's Planning Website, with all but a small handful strongly expressing objections to the proposals. It would be neglectful of the Parish Council to not consider those viewpoints.

## Objection Part 2

Core Strategy comparison.

The Parish Council is aware of the effort that has been expended on creating a sustainable policy for development within the County of North Somerset through the development of North Somerset Council's "Core Strategy".

Bleadon Parish Council believes that a robust and well-considered policy for housing growth in North Somerset has been developed. Unlike the planning proposal with which this objection deals, North Somerset's plan is of an integrated nature embracing housing, employment, transport, and provision for education whilst attempting to protect "sensitive" environmental areas.

Bleadon Parish Council believes that there is sufficient objection to the planning proposal on environmental and ecological grounds to prove the proposal to be unwise in the extreme.

The Parish Council believes that the proposals are seriously flawed when set beside the policies embodied in North Somerset Council's 'CORE STRATEGY'.

The Core Strategy provides a useful framework to critique the planning proposal, and thus the following objections mimic the layout of that document although the arguments made are self-supporting.

(It is accepted that some sections of the Core Strategy may have no direct relevance to the proposal as it stands, and therefore no comment is made on certain aspects).

Bleadon Parish Council believes that a number of its objections are of sufficient strength, individually, to give grounds for the rejection of this proposal. Together they form a formidable argument against development of the inappropriate, unsympathetic, and environmentally damaging nature of this proposal.

### NORTH SOMERSET CORE STRATEGY:

The North Somerset Vision is set out in the "Sustainable Community Strategy" (SCS). "Vision 7 Infill Villages and Countryside Vision".

This states: "Rural areas will retain and enhance their countryside character where the quality of the natural environment is the prime objective and any new development will be small scale and strictly controlled. The infill villages will have maintained or enhanced their individual character, identity and sense of community", and "The surrounding countryside will have retained its open natural character, its distinctive landscapes protected from inappropriate development, agricultural use supported and valued for its biodiversity"

Clearly the grafting of 200 homes onto an historic village, whilst at the same time destroying an area rich in wildlife, is totally incompatible with this vision.

### SPATIAL POLICIES:

#### CS1- Addressing Climate Change and Carbon Reduction.

It would appear that the Applicant has not considered, or made apparent, a way in which to offset the long-term loss of the CO<sub>2</sub> absorption which is offered by the land earmarked for development. The development is at odds with CS1.8 "The re-use of previously developed land and existing buildings is preferred to the loss of greenfield sites".

#### CS3- Environmental Impacts and Flood-Risk Assessment.

The Parish Council believes that the proposal's lack of "Sequential Test" is a major flaw.

It is noted that the proposal has ignored, or failed to address, NSC's assertion that with increased sea-levels, a likely factor in coming years, Flood Zone 2 areas should be treated as Flood Zone 3a unless there is evidence to the contrary.

It is also noted that the site is close to a river draining into the nearby Severn estuary which has the highest fluvial discharge volume in England and Wales; and the third-highest tidal-range (15.4 meters), globally.

#### CS4- Nature Conservation.

Despite the developer's addressing of the issues to some degree, it is difficult to see how such a development in this location can achieve a positive impact upon biodiversity. "Mitigation" can never guarantee that the impact of such a large-scale project will not have a negative impact on the flora and fauna of such an area. The Proposal notes evidence of protected species (Greater and Lesser Horseshoe bats) and evidence of previous occupation (and potential return of) Water Vole.

Local residents attest to the presence of kingfisher, heron, egret, mallard, deer, otter, and newts, to name but a few. Clearly the great diversity of wildlife within the fields and watercourses of this site suggests that development is inappropriate on these grounds alone

#### CS5-Landscape and the Historic Environment.

Bleadon lies within a "Heritage Landscape" which is worthy of protection.

The Mendip Hills AONB is close to the development site, and the Coastal Plains and Moors (Bleadon Moor) are identified as a "Character Landscape" in the North Somerset Landscape Character Assessment (NSLCA).

The AONB is protected by NSC policy DM11 of the Development Management Policies.

The Applicant asserts that with increasing distance the visual impact of the proposed buildings will become less apparent. Development that can be seen from the AONB, or the West Mendip Way must be resisted. The developer also comments that people walking on the hills have only intermittent views of the site, as it is obstructed in places by vegetation; and thus the retention of the open fields is not of great value in this respect. It is to be stressed that these "intermittent views" are part of the very essence of an AONB.

If one were to accept these assertions at face-value then a case could be made for permitting quasi-urban development along the foot of virtually every range of hills in the country. Set against the context of an AONB and "Designated Character Landscapes" with a great ecological diversity, the Applicant's LVIA stated arguments become indefensible.

The Applicant also entirely misses the point that those "intermittent" views are of pleasant open landscape rather than roads and houses.

#### CS-9 Green Infrastructure.

This policy states "Priority will be given to ..... protection and enhancement of biodiversity". Villagers have noted a wide range of mammal and bird species. Indeed, the Applicant's own Preliminary Ecological Appraisal (PEA) identifies a wide range of fauna. Rather than attempting to mitigate the unavoidable, and potentially irreparable, damage the Parish Council believes that development should not be permitted at all.

#### CS-10 Transportation and Movement. CS-11 Parking.

The Core Strategy asserts "Through the development management process planning applications will need to address how they can deliver a choice of transport modes which could provide a realistic alternative to the car".

It is the view of the Parish Council that the proposed development will become in essence a dormitory annexe to the village. It is anticipated that, even only allowing for one car per dwelling (an extremely conservative estimate!), there will be upwards of 200 additional vehicles in and around the village.

The Applicant asserts that a Travel Plan will be put in place. Unfortunately this can only be done AFTER the build is complete and occupied and is dependent upon the new residents "buying into it". The Travel Plan, it would appear, is largely focussed on an information pack with little confidence that its contents would be heeded.

It is noticed that the relatively few cyclists who commute along the A370 frequently use the narrow, inadequate footpath rather than compete for space on the road with the high volume of fast-moving traffic.

The Applicant goes on to give details of bus timetables but fails to note that availability is seasonally affected e.g. 40% of the scheduled No. 20 buses are "Summer-Only".

In CS11 NSC notes that "while much can be done to encourage travel by other modes, there will still be high car ownership". In other words Bleadon will experience a vast increase in commuting and school-runs.

#### CS-12 Achieving High Quality Design and Place Making.

The Core Strategy asserts "The following aspects of North Somerset's character should be maintained and enhanced.....The historic rural settlements".

The grafting-on of 200+ dwellings to a village that has grown organically over the years will do nothing to maintain the character of Bleadon and everything to destroy it. The Parish Council again objects strongly to the proposal on these grounds.

#### CS13- Scale of New Housing.

"The Core -Strategy approach is to ensure that housing growth is better-related to employment growth (employment-led) than in the past". The proposal would seem to offer only minimal employment prospects over and above the employment already in existence in the village and its

environs. There can be no guarantee that the few jobs created will go to residents of the new development and indeed, further traffic may be created by these workers "commuting-in" to Bleadon. Consequently the proposal fails entirely by this criterion.

#### CS14- Distribution of new housing.

The Core Strategy asserts that "Settlement Boundaries define the area within which residential development is acceptable in principle".

In the LVIA the Applicant states "The proposed development will fit into the landscape pattern adjacent to the existing village"; thus lying outside the settlement boundary and ignoring the "infill" status of Bleadon.

The LVIA states that houses along Bleadon Road...and Bridge Road limit views toward the proposed development from the houses to the north and east of these roads "although oblique views and views between intervening properties towards the development site are possible". The Applicant misses the point that it is such views of open countryside rather than a housing estate that adds to the character of small villages like Bleadon.

The Parish Council is aware that "loss of view" per se is not in itself grounds for objection but, in this case, it is clearly demonstrable that the views are inextricably entwined with the "Rural Character" of the area.

#### CS25- Children, Young People and Higher education.

NSC has developed an integrated strategy of matching new schools to planned housing development and population growth; four primary schools and a secondary school are being considered.

Ignoring NSC's Education Strategy and creating a significant increase in the number of children in Bleadon will both a) Increase the volume of "school-run" vehicles on the roads and b) put undue pressure on local primary schools which are close to capacity. The latter may mean even longer trips to schools, beyond those of Lymphsham or Uphill.

#### CS26- Supporting Healthy living.

Bleadon Road provides a level walk with open vistas which is used during the day by many residents for the exercising of both themselves and their dogs.

Developing the fields will have the effect of removing a recreational amenity from the people of Bleadon.

The fields also provide a "buffer-zone" between the village and the busy A370. They contribute to the creation of a tranquil environment which may be conducive towards the maintenance of positive mental health.

#### C33- Area Policies. Infill Villages.

"Within the settlement boundaries of the infill villages....residential development of an appropriate scale which supports sustainable development will be supported providing that...

- The form of the development respects the scale and character of the settlement."

Clearly the proposal fails to observe this requirement.

For all these reasons (stated in terms informed by the NSC Core Strategy) Bleadon Parish Council urges North Somerset Planners to reject the proposed development on the fields adjacent to the village.

### Objection Part 3

#### Commentary.

Bleadon Parish Council notes that, within the submission, the Applicant exhibits at worst a fundamental lack of respect for the Planning Process, or at best a lamentable lack of care through a series of demonstrably inaccurate and misguided assertions.

In the Planning Access Design Statement, the Applicant asserts "the application site consists of approximately 8 hectares of pasture land".

In the Utility Assessment Report the Applicant asserts "The proposed development site consists of 10.6 hectares". This is a difference of some 25%.

If the Applicant has overlooked such discrepancies (or could not be bothered to update the plan) then it calls into question the veracity of other statements made.

It is evident from the information enclosed as support material (e.g. the LVIA) that whilst a great deal of generic information is provided on methodology the concluding statements with reference to the impact of the Proposal are largely subjective, rather than objective, in nature.

Comment has already been passed on the inaccuracy of information regarding frequency of public transport.

The Applicant also claims in the PADS :

"The village is close to Weston-Super-Mare (sic.) where services are achievable quickly and easily, indeed access to the hospital, the sea-front, the major shopping centre of Weston-Super-Mare (sic.) are all within a 20 minute walk or 5-minute bus ride".

From the designated development-site entrance to the hospital entrance is a distance of 1.4 miles (via the a370). To reach the hospital on foot, along a footpath too narrow in many places for two people to walk abreast, and adjacent to speeding traffic, within 20 minutes would require would require a steady pace of 4.2 mph. The hospital is a five minute bus-ride away. The nearest beach access point is a 40 minute walk. The shopping centre is a 17 minute (scheduled) journey; or a walk in excess of one hour.

A Community Consultation Event was held by the Applicant in September 2017. It was noted that those villagers who work normal office hours were effectively excluded by the 11:00 to 18:00 timing of the event.

The Applicant's representative appeared ill-prepared and under-resourced (being in possession of only two A3-size plans of the development proposal) and found it difficult to respond to the reasonable requests and observations of villagers. For example, when asked about the Flood/Precipitation Run-Off survey she was unable to give any information but insisted that this had been carried out. Documentation accompanying the Proposal shows that this was not completed until the following February - why say that it had already been done? Earlier in the summer of 2017 a team of surveyors (sporting the Sutherland's logo on their uniform) were seen using theodolites to establish levels for the site. When approached, one of the surveyors

responded to a villager's query by claiming to be conducting an Archaeological Survey. This matter was raised at the Community Consultation event and the Applicant's representative supported this assertion. If so, then where is the Archaeological Survey report? Many in the village regard this "consultation" as a cynical attempt to gain an insight into possible objections to the plan.

In the Statement of Community Involvement the Applicant claims that following the Community Consultation Event "The scheme was substantially redrawn as a result of the feedback received" thus "reducing the size by almost a third". This statement is disingenuous because the size reduction resulted from one of the landowners withdrawing from the scheme when the extent of opposition to the proposals became evident. Additionally, if the figures of 8ha and 10.6ha are accepted, it takes only a cursory glance to establish that the "reduction" is of the order of a little more than 20% rather than the 33% claimed. Given other examples quoted in the Parish Council's response, it is strongly recommended that any figures supplied by the Applicant are carefully and independently validated.

It is true that the "unwanted" Primary school was deleted from the original proposal but villagers are also aware that there never was any support (financial or otherwise) to be forthcoming from the NSC Education Department.

In the PDAS, the Applicant makes rather naive statements in an attempt to justify the plans. For example "The villages (sic)...aspired to better health care, retail offer, employment opportunity, and highway improvements". This statement could conceivably be applied to any community in the land.

The villagers have no realistic expectation that the Doctor's Surgery/Health Care Centre will ever become a reality.

The Applicant has consistently ignored the wishes of the overwhelming majority of villagers. It is hoped that more attention will be given to the 300+ objections to this Proposal.

Bleadon Parish Council reaffirms its stance on the proposal and requests, on the behalf of the apparent majority of Bleadon residents, that planning proposal ref. 17/P/5545/OUT should be rejected by North Somerset Council.

#### Objection Part 4

Summary of the objections lodged with NSC.

The Applicant refers, in the Statement of Community Involvement, to the fact that the "Village and community within Bleadon are vocal and engaged with planning." It is a pity, having established the veracity of this, that so little attention is paid to, and respect accorded to, the wishes of these people for the development proposed for their community.

There have been well in excess of 300 objections to the proposed development lodged with North Somerset Council; a remarkable number given the small size of the village. The overwhelming majority of these have come from village residents but it is pleasing to note that a few people from further afield, who know and love Bleadon, have been moved to respond in support of the village and in condemnation of the proposals.

Bleadon Parish Council takes note of the responses of its Parishioners and requests North Somerset Council to take heed of their requests to refuse planning permission for this proposed

development.

The objections to the proposed development can be broadly summarised under concerns of:

- North Somerset Council's Sites Allocation plan has been agreed with the Government inspector.
- The planned proposal lies outside the boundary of a designated "infill" village.
- The proposal is at far too great a scale for the size of the village.
- The proposal runs contrary to the principle of "Brownfield" sites being developed in preference to "Greenfield" sites.
- Detriment to the "Rural Character" of the village.
- Detriment to the "Rural Character" of the surrounding area, inclusive of the Mendip Area of Outstanding Natural Beauty, designated "Heritage Landscapes" and the West Mendip Way footpath.
- Detriment to the ecological well-being of the area, including diverse species of bird, mammal, and insect; and including species protected by law.
- There is concern for the loss of agricultural land.
- Flood risk. The land concerned is notoriously ill-drained. The hard-landscaping of a housing-estate development will exacerbate the problem by accelerating surface run-off of precipitation. This in turn will affect other areas. The rhynes, at present, struggle to cope.
- There have been instances in the recent past of existing properties being flooded.
- Wessex Water Authority has recently paid compensation to residents who have had property flooded by raw sewage due to the failure of the existing sewer network to cope with demands put upon it.
- There are justifiable concerns over the potentially large increase in cars in the village as a result of the development. The A370 has been the scene of frequent accidents, including fatalities. Drivers increasingly use the narrow rural lanes accessing the village as "rat-runs" to avoid the A370 and reach the Bleadon Hill/Oldmixon area of Weston-super-Mare or to access the A38 via Loxton and Cross.
- Vulnerable rural road users such as horse riders and cyclists may be at increased risk of accident from higher volumes of traffic. Cars frequently exceed the 30mph speed limit and HGV's ignore the weight restrictions on village roads.
- The fields have an amenity function for Bleadon next to level walks with open, rural, views adjacent to the village.
- The fields form a buffer zone between the village and the busy A370 road.
- Bleadon has an amenity function for Weston-super-Mare and the wider area. There is a fear that visitors, cyclists, and walkers/ramblers will be discouraged by the over-scale and out of character development and may no longer choose to visit the village.
- Concern has been expressed that the village shop/Post Office may close in face of competition from the more conspicuous (in terms of location on the A370) shop in the new development, with the resultant loss of the village Post Office. The nearest Post Office would then be 2.2 miles away. The Esso service station (with associated shop and workshops) has also expressed fear of closure with resultant job-loss.
- There is a concern that the "Dark Skies" currently enjoyed by the village will be lost as a result of illumination of the new housing estate (which impacts upon those residents enjoying astronomy



and may adversely affect protected species of bat).

- Villagers have also expressed a valid concern that the proposal runs contrary to the policies of North Somerset Council, whose councillors have been democratically elected and entrusted to develop and uphold sustainable planning policies for the county.

-o0o-