

Martley Parish Council

Response to planning application 21/01918/FUL

Martley Parish Council strongly opposes this application to build 85 dwellings on a field South of the playing field on the outskirts of the village. We do so for the following reasons:

1. The development would be unsustainable

The development would result in the loss of 3.9ha of land classified as Grade 2 on the Agricultural Land Classification and which therefore counts as 'best and most-valued agricultural land'¹. The loss of good agricultural land of this kind results in increased food imports and a reduction in biodiversity. Because of its proposed location, almost all journeys made by residents to work, shop and even to take their children to school would be made by motor vehicle. Sustainability is a prime consideration for approving development in the National Planning Policy Framework (NPPF)², and this requirement has been emphasised recently by the increasing rate of climate change, which has seen thousands of square kilometres of the world on fire, with increased droughts and food shortages.

Loss of biodiversity

The proposed development would replace a field surrounded by hedges that has a long history of arable cultivation. It includes two ancient oak trees much used by raptors which feed on small mammals and farmland birds which feed on the corn. Although the plan proposes to retain the oak trees, it is difficult to believe that raptors would continue to use them in the midst of a housing estate. The proposed development does not include any proposals that would promote biodiversity, and it is probable that any front gardens would, like those in other residential developments, soon be paved over to provide parking space for cars. It should be noted that recent Government policy emphasises the importance of food production while also changing farm payments to protect the environment³. This is expected to increase biodiversity in arable farmlands.

Increased travel by motor vehicle

People living in rural areas travel twice as far each year than those in towns, and that 88% of all travel in rural areas is by car compared with 69% in most urban areas⁴. This is largely because of the greater distance to work, shopping and entertainment facilities, as well as the limited availability of public transport. DEFRA data indicates that each rural inhabitant makes 780 trips by car/year⁵. The majority of new householders will have two or more cars, so that a development of 85 houses with a mean occupancy of 2.5 indicates that the proposed development in Martley will result in an estimated additional 165,750 car journeys/year. To this must be added journeys by delivery drivers, which are particularly frequent in rural areas. The estimated number of current journeys by motor vehicle is higher than that in the Transport Assessment produced for the application,

which carried out a traffic survey at a time of major travel restrictions because of the COVID outbreak, and which failed to make any adjustments to these estimates for a return to normal travel patterns ⁶.

There is very limited local employment in Martley and the surrounding rural area, and it is difficult to reach this using public transport. Local surveys carried out for the Neighbourhood Plan found that only 4% of residents used a bus to travel to work. Martley does have limited bus service to Worcester, which is mainly used by students attending the Sixth-Form and Technical Colleges. However, the last bus leaves Worcester at 1740 and the service only operates for six days/week. The Transport Assessment is therefore incorrect in concluding that Martley has a 'reasonable' bus service⁷. There are further inaccuracies in that report:

- ▶ There are only three services/day from Martley to Worcester on the 310 bus route, not "approximately every hour".
- ▶ The 308 bus route travels through many widespread villages and takes 45 minutes to reach Worcester. It is therefore little-used by Martley residents. There are only three services/day, not "every hour to hour and a half"⁸.
- ▶ Buses on the 310 service to and from Worcester do not stop at the Crown bus stop, but leave from the junction of Mortlake Drive and St Peters Drive. There is no direct footpath access to this stop from the estate.
- ▶ The 420 bus service does not pass through or stop in Martley Parish.

All the evidence indicates that the design and location of the proposed development would promote car travel even for visits to the shop and schools in Martley. This is because the footpath route is via a narrow pavement along Berrow Hill Road, which varies between 1.8 and 1.5 metres in width. This can be seen in the picture below. It is difficult to imagine parents feeling safe taking young children to school along this footpath. This is particularly the case given that both the Primary School and the Chantry Academy are 1.2 kilometres from the proposed estate.



The application does propose footpath access to Hollins Lane (a lane the width of one car and with no pavement) and to the playing field from the North-East corner of the site. However, the plans do not propose a direct footpath link from the estate to the bus stop used by residents travelling to and from Worcester, at the junction of Mortlake Drive and St Peters Drive. This is also the location for GP clinics and the local pharmacy. Residents of the proposed estate would probably therefore use their cars to reach this location.

Conflict with planning policies

The proposed development conflicts with the NPPF, which states that:

“Planning policies and decisions should contribute to and enhance the natural and local environment by:

- (a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- (b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland...”⁹

The proposed development falls outside Martley village development boundary, and therefore fails to meet the requirement of Neighbourhood Plan policy MKD6, which states that:

“New housing development in the open countryside, outside the Martley village development boundary (Map 3), will be only supported when it is:

1. A dwelling clearly necessary for use by rural workers including persons employed in agriculture, horticulture, forestry or a rural enterprise; or
2. Affordable housing on an exception site to meet identified local need; or
3. A replacement of an existing dwelling with established use rights and where the replacement dwelling does not exceed the original footprint by 30%; and
4. Securing the future of a heritage asset, or is of a design that is of exceptional quality or truly innovative.”

2. The development would exacerbate travel problems

Martley is in the middle of a network of narrow winding lanes with limited capacity for extra traffic. The proposed development would result in a major increase in motor vehicle traffic through the centre of the village and along the narrow lane between the Chantry Academy and the Primary School. Martley has hardly any parking space near the shop and garage, and there are major traffic problems at the main T-junction and on the lane between the schools at the times when schools open and close. There is some parking space at the schools, but this is inadequate to meet demand, and the result is congestion with coaches and cars posing a danger to children and contributing to air pollution.

The Transport Assessment completed for the application estimates that 63% of all car journeys from the proposed estate would be through the T-junction in the centre of the village and 50% from there to Worcester along the lane between the schools¹⁰. As noted above, the estate would be further than the recommended 800m from local schools, and the path along Berrow Green Road is narrow and the road is busy at the times schools open and close. The great majority of children living on the estate would therefore be ferried to and from schools by car, thus worsening an already difficult situation. The photograph below shows the narrowness of the Worcester Road, leading from the shop and garage to the schools.



The Transport Assessment also estimates that 13% of journeys would take a Southerly route from the proposed estate, across Ankerdine Hill to the A44 at Knightwick. This route includes a section at Collins Green where the road is the width of a single vehicle and is unsuitable for current volumes of traffic.

3. The development would blight views of the local landscape

The proposed development would be of predominantly two-storey houses on a field rising five metres from the playing field, and would dominate views from nearby houses, from the playing field and from the Southern side of the Hopyards estate. When playing football or cricket, people would no longer look across fields and hills, but instead see the brick side-walls of house and rows of parked cars. People travelling towards Martley from the South would see the edge of a housing estate instead of a small village clustered around an ancient church. The photograph below shows the site of the proposed development in the middle distance, around an ancient oak tree.



The visual impact of the development would be particularly severe for residents in the existing village houses to the East of the site, who now look across fields to Berrow Hill, but would in future be confronted by two-metre high back-garden fences immediately in front of their houses.

The Landscape and Visual Impact Appraisal (LVIA) accompanying the application notes that the development will be visible from the village housing to the East of the site, from the road to the West of the site, from the playing field to the North of the site, and from the public right of way to the South of the site. The report notes that the impact of construction would have a severe impact on visual amenity from most views of the site, followed by a medium impact once construction has been completed, falling to a lesser impact after 15 years because of the growth of intervening vegetation¹¹. However, this is incorrect because the site plan shows that new vegetation would only be planted in the North West and South West corners of the site. It would not therefore, even after many years of growth, screen the new buildings from village housing to the East of the proposed site, or from the playing field and the Hopyards estate beyond.

It is disappointing that the LVIA generally seeks to minimise the landscape value of Martley's setting. As an example, it concludes that the view South from the playing field: "has a semi-open and rural character and is moderately pleasant. Overall, the view is low value as it does contain some detractors and it is unlikely to be visited in order to experience the view itself". These 'detractors' are the skate park and the playing area, which are within the playing field and not in the site proposed for development!¹² It is striking that the LVIA fails to include any photographs of this and the other views that it so

dismisses. This is not in accord with the GLVIA3 method used for the LVIA, which states that judgements about landscape value should take account of “recognition through designation, appearance in guidebooks, facilities provided for enjoyment of the view” and that the views which contribute to the landscape setting enjoyed by residents in the area.¹³ The fine scenery surrounding Martley has often been appreciated by guidebooks¹⁴. It is also much enjoyed by local residents, who voted to approve our neighbourhood plan. This included policy MKD1, which stated that:

“To be supported development proposals must: demonstrate they are sited, designed, and of a scale so as not to substantially harm the Significant Views when seen from locations that are freely accessible to members of the general public”...

Relevant protected views are No. 2 (outside the Conservation Area) “Looking South from Martley Recreation Ground towards the iron-age fort on Berrow Hill and the outskirts of Berrow Green”, and No. 3 (outside the Conservation Area) “Looking North from the top of Hollins Lane across the fields to Martley village with the range of hills leading up to Woodbury Hill in the background”.

4. The development would strain drainage and other local services

Martley village occupies low-lying ground with hills on three sides, and frequently experiences surface-water flooding. The most persistent floods are in the North-East corner of the field proposed for this development. The picture below shows a sight which occurs every Winter, and is considerably more extensive and frequent than that identified in the *Flood Risk Assessment* enclosed with the application¹⁵. Water from the field annually floods gardens in neighbouring houses. This problem would be exacerbated by the proposed development, which will reduce the capacity of the field to absorb floodwater. The application proposes to construct a large drainage pond with a pumping system to divert water uphill to the main storm drain on Berrow Green Road (to the West). It also proposes a new sewage pipe to the North across the playing field¹⁶. The developer has yet to approach the Parish Council (which owns the playing field) for permission to do so. These proposals for alleviating floods and for disposal of sewage are not acceptable to the Local Flood Authority and the Land Drainage Partnership¹⁷. Martley has at times experienced power cuts during severe storms, and there is therefore a danger that a pumping system would fail at times of greatest need.



The Parish Council is concerned that the application does not include any estimate of the possible impact on the local water supply and the local sewage farm. Our experience with previous developments has indicated that new developments of this scale may present problems for water supply and sewage-processing facilities which can take years to rectify. We therefore recommend that the application include an assessment of these services to enable the relevant agencies to anticipate the need for additional capacity.

One further impact that needs to be considered is on local health services. The SHELAA assessment for the proposed site noted that this development would have a “large and/or cumulative impact on health services including ability to register with a GP practice. Community health care may be impacted. Acute trust provision would need to be addressed (including shortfall in allocation of beds/staff for the financial year in which the development is built)”¹⁸. The *Infrastructure Study and Delivery Plan* completed for the SWDPR notes that severe underprovision of primary care services will result and that the Clinical Commissioning Group has estimated that the Great Witley Surgery (which serves Martley and much of the Teme Valley) is ‘Assessed as lacking capacity to meet current growth’. Current list size is 6800, which is expected to expand to 7291 by the end of the Plan period if all the proposed developments are implemented. The gross internal area (GIA) of the practice in Great Witley is 381m², while the needed GIA is 706m².¹⁹ Underprovision of primary-care services can become a major problem in rural areas because the unavailability of registration with a nearby GP practice may require extended travel.

5. There are problems with the design of the proposed estate

The design of the proposed estate is suburban in style, similar to those being built by Lioncourt in Oldbury, Telford and several other places. It includes straight roads of closely-packed two-storey houses with tiny front gardens, and a design of house that could be built in any town in England. The design is for a self-contained estate which does not take account of the characteristics of the site, the village environment or the impact on its immediate neighbours. The proposed estate would look away from the rest of the village. There would be a single access road on the opposite (Western) side of the proposed estate from the rest of the village, while those houses on the Eastern side would present their back-garden fences to the existing residents. The design lacks permeability. There would be two access footpaths: one to the narrow Hollins Lane and one to the North Eastern corner of the playing field. But as noted above, there would be no direct footpath access to the main bus stop and the GP and pharmacy outstation at the corner of St Peters Drive and Mortlake Drive.

This design does not therefore meet the requirements of the NPPF, which recommends a high standard of design with a preference for tree-lined streets²⁰, “street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods”²¹, and housing that is “sympathetic to local character and history, including the surrounding built environment and landscape setting”²². It also does not meet the requirements of the Neighbourhood Plan policies MKD3 and MKD4. These state that:

“All new development proposals must meet the following requirements:

1. New development should enhance and reinforce the local distinctiveness of the area and proposals should show clearly how the general character, scale, mass, and layout of the site, building or extension fits in with the ‘grain’ of the surrounding area. Care should be taken to ensure that building(s) height, scale, and form, including the roofline, do not disrupt the visual amenities of the street scene. Generic house styles that do not reflect the distinct local character will not be acceptable...”

and:

“To be supported development proposals must meet the following settlement design principles:

1. Proposals for new build residential development must demonstrate their scale (in terms of number of dwellings) responds to local character and development history; and reinforces local distinctiveness in particular including open spaces between buildings, and irregular layouts.
2. New developments must be fully integrated into the existing settlement through layouts which promote permeability and accessibility to neighbouring residential areas, open spaces and facilities...”

Conclusion: an unsustainable development

This site was included as a non-strategic allocation in the SWDPR Preferred Options

report. Despite the stated disadvantages of the proposed development in the SHELAA assessment, the SWDPR report presented no reasons or evidence in favour of the site nor any estimates of the need for further housing in this parish.

Martley village has a population distribution similar to that for Malvern Hills District as a whole, but has grown at a faster rate than the District in the last decade. The SWDP allocated 65 dwellings for the village, all of which were completed within two years of the publication of the Plan. Since then, a further 12 dwellings have either been completed or have received planning permission. The latter are scattered over five different sites. This pattern of incremental growth helps preserve the rural character of the community. If a future local plan decided to increase the amount of housing in the village, then the most suitable sites would be on Eastern side of the village within easy walking distance of the schools and sports centre. This would be preferable to the current planning application for an unsustainable suburban housing estate far from the centre of the village, which would increase traffic and spoil our views of the beautiful English countryside.

References

1. *SHELAA site assessments: Martley* (2019).
https://www.swdevelopmentplan.org/?page_id=14734. Accessed 7 December 2019.
2. Ministry of Housing, Communities and Local Government (2021) *National Planning Policy Framework*, para 7.
3. Dimpleby H (2021) *National Food Strategy. Independent Review. The Plan*. Department for Environment Food and Rural Affairs (2021) *Policy paper. Sustainable Farming Incentive: how the scheme will work in 2022*.
4. DEFRA (2019) *Statistical Digest of Rural England*, pp85-86.
5. *Ibid*.
6. Whitelow M (2021) *Lioncourt Homes. Land to the south of Martley Playing Fields, Worcestershire. Transport Assessment*. Cotswold Transport Planning, Cheltenham, pars 2.15 to 2.17.
7. *Ibid*, para 3.15.
8. *Ibid*, para 3.13.
9. Ministry of Housing, Communities and Local Government (2021) *op cit*, para 174.
10. *Ibid*, Table 6.3.

11. Brindle & Green (2021) *Landscape & Visual Impact Appraisal. Land adjacent to playing fields, Martley, Worcestershire. Report Reference: BG21.190.2, pp76-77.*
12. Brindle & Green (2021) *op cit*, p50.
13. Landscape Institute (2013), *Guidelines for Landscape and Visual Impact Assessment. Third Edition*, paras 6.37 and 6.33.
14. Eg Brook A and Pevsner N (1994) *Worcestershire. The Buildings of England*, Yale University Press, New Haven and London; More J (1980) *The Welsh Marches*. In Hadfield J (Ed) *The Shell Book of English Villages*. Michael Joseph, London.
15. Grady J (2021) *Berrow Green Road Martley Flood Risk Assessment*. RPS Consulting Services Limited, Birmingham p13.
16. *Ibid*, pp19-21.
17. See comments on the application.
18. *SHELAA site assessments: Martley (2019) op cit.*
19. Ove Arup (2019) *Infrastructure Study and Delivery Plan*, p67.
20. Ministry of Housing, Communities and Local Government (2021) *National Planning Policy Framework*, para 131.
21. *Ibid*, para 92a.
22. *libid*, para 130c.