

## **Planning application 21/01918/FUL**

This is the response of Martley Parish Council to the letter sent to you on the 26<sup>th</sup> January by Joe Bennett of RCA Regeneration, relating to the proposed development by Lioncourt Homes of 85 dwellings in open countryside near Martley.

We are pleased that RCA Regeneration have taken so much care to read the original response by Martley Parish Council to this planning application, but believe some clarification is needed on the points they raise. Their letter confirms that the drainage issues have yet to be resolved, and that the applicants believe they need take no account of the pressure on local services that would arise if the development were to be approved. It is a matter of regret that the LVIA has still not been clarified and includes no photographs of landscapes or visualisations of the proposed development. Subsequent reports by the Landscape Officer and the Urban Design Consultation confirm the Parish Council's criticism of the visual impact and design of the proposed development.

There remain some points that need clarifying, as follows.

### **1. Biodiversity**

Large housing estates of brick, wood and concrete offer little opportunity for biodiversity. The main argument otherwise (and made by RCA Regeneration) is that they can retain existing trees and hedgerows, and provide additional trees and diverse green space. The Landscape Officer's report on the application (2<sup>nd</sup> February 2022) notes that: "the proposed layout shows an incursion into the root protection area of one of the best trees on the site", and inadequate protection for other existing trees during the proposed construction. These trees would therefore be imperilled by development. The Parish Council (together with many similar communities) has bad experience of the landscaping proposals made by developers of previous housing estates. We found that a few trees were indeed planted, but many died and were not replaced. In one case, a developer proposed a substantial green space, which was subsequently proposed for an additional dwelling and has now been left as waste ground. Rather than a range of biodiverse habitats, development usually seems to result in closely-trimmed grassy plains.

### **2. Vehicle travel**

A long section of the letter concerns data on bus services and travel to work and school. The original response from the Parish Council demonstrated that the proposed development would be unsustainable, and used DEFRA data to estimate that it would result in an additional 165,750 motor vehicle journeys/year. The letter from RCA Regeneration claims that the impact of building 85 dwellings in a country village "would not be significant" in generating additional motor vehicle journeys. However, the Transport Statement which accompanied the application was concerned with only with estimating additional traffic in peak periods and includes no clear statement of the expected annual increase in vehicle usage. The argument in the letter that COVID will result in an all-time reduction in travel to work is unconvincing. ONS data shows that previous episodes in which restrictions were lifted resulted in a rapid decline in the number of people working from home<sup>1</sup>, while many people who work *from* home (such as self-employed tradesmen) do not work *at* home.

A further argument made in the letter is that building a large housing development in Martley would be 'sustainable' because it is a category 1 village, with schools "within easy walking distance from the site". The Parish Council's response noted that both schools are 1.2 kilometres from the site, beyond the 800 metres which is usually taken as ordinary walking distance. Roadside journeys would be by a narrow pavement alongside a road in which traffic surveys conducted by the Highways Authority have found "85th percentile speeds of 45.2mph and 47.4mph northbound and southbound respectively". The junction in the centre of the village is hardly suitable for either pedestrian or cycle traffic at peak times, as can be seen in the photograph below. Most of the alternative footpath route suggested in the letter (Hollins Lane and Church Lane) is along narrow lanes with no pavement. In these circumstances, most children from the proposed estate would travel to school in their parents' cars.

The photograph also shows that the letters is incorrect in stating that "there are no overriding concerns" about the safety of the Worcester Road during the times children go to and from school. Road safety in Martley is a major concern among residents, and the



Parish Council has completed a Road Safety Strategy which has been submitted to the Highways Authority. The Strategy identifies several problems, including parking near the T-junction in the centre of the village. At peak periods, this extends along Berrow Green Road around the curve. An additional 85 dwellings further along Berrow Green Road

would worsen this problem, and it is a matter of regret that this is not addressed by the Transport Statement.

The letter challenges the Parish Council's data on bus times. This seems to be a result of the applicants relying on the Traveline website, which like many centralised databases fails to take account of local complexities. Some buses from Martley run only on school dates, while others (at different times) run only in the rest of the year. The morning bus which takes students to the Sixth Form College in Worcester is not available to the general public. The local timetable confirms that none of the direct services to Worcester stop at the Crown site. By failing to take account of these factors, Traveline and RCA Regeneration overestimate the number of services available to residents.

### **3. Planning policy**

The letter from RCA Regeneration agrees that the proposed development would be on best and most valuable agricultural land, but argues that it would not be possible to build 85 dwellings elsewhere near the village without using land of similar value. This of course assumes that 85 new dwellings must be allocated somewhere in Martley Parish. However, the application includes no estimate of housing need in the Parish or the neighbourhood plan area, and bases its case on the lack of a five-year land-supply in Malvern Hills District. The latter is almost certainly a short-term phenomenon and centrally-determined housing targets may in any case be amended in the forthcoming Planning Bill. It would therefore be unwise to approve a large and unsustainable housing development on the basis of short-term administrative factors. Nor does the letter provide an explanation for why so many dwellings are required for the site. There is a striking contrast between the 85 dwellings on 3.9ha of land in this application with the much lower density of 52 dwellings on 4.25ha in the proposed development at Sandyfields in Martley (21/2245). This suggests that many of the problems with the design are the result of a desire to maximise income at the expense of the quality of life. The result, if approved, would be a large unsustainable estate of closely-packed houses devoid of the 'tree-lined streets' favoured by the NPPF, and with a population dependent on motor vehicles for shopping, socialising, work, and education<sup>2</sup>.

11 February 2022

### **Endnotes**

1. Office of National Statistics (2022) *Coronavirus and the social impacts on Great Britain: 4 February 2022*.

2. See a recent critique of housing estate design: Transport for New Homes (2022) *Building Care Dependency. The Tarmac Suburbs of the Future*.