

WALTHAM ST LAWRENCE PARISH COUNCIL

The Old School, The Street, Shurlock Row, Berkshire RG10 0PR

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To: RBWM 15th January 2018
BELLMANS HANGER SHURLOCK ROW - APPLICATION No 17/03903

This site is wholly unsuitable for a development with this number of houses due to its rural location and dangerous junction. Development should be restricted to the existing permission for 3 houses on the site.

Before detailing specific concerns there appear to be two major discrepancies which need immediate clarification:

First HEIGHT, there is no information given as to whether or not the height of any part of the development exceeds that of the existing hanger, although it clearly does of the ancillary full length single storey building. As such it conflicts with the all-important openness of the Green Belt GB2 A.

Second FOOTPRINT, para 3.11 states "No buildings are proposed outside the footprint of the hanger", whereas Information Plan shows that over half of the full height dwellings 6-12 lie within the single storey building (i.e. not the hanger) with 1 & 18 half outside and now closer to boundary firs/Ielandii and the neighbouring farm, not shown on artist's View 4, so limited "reducing the spread of built form across the site" GB2 A.

The Parish Council strongly oppose development outside of the existing footprint (ie plots 1 and 18) and any development being higher than the height of the existing hanger ie plots 6-12, 1 and 18. This highlights a conflict with paragraph 4.28 of the Planning, Design and Access statement which suggests that very special circumstances exist as the proposal would have an impact on the openness of the green belt.

Our 'specific concerns' relate to the 500% increase in the number of residential units as compared to the existing permission resulting in:

1. The previous warehouse vehicular use was restricted by condition 6 of 99/34780 to one round trip per user per day i.e.18, the proposed residential use assumes an average of 5 trips per dwelling i.e. 90 a day which is a 400% increase, added to which would be delivery vans and refuse trucks whilst HGVs were specifically prevented from entering the site. Current storage use generates no more than 2-3 visits per day and it is now admitted that "the building is not fit for purpose", so would no longer be viable as a commercial undertaking. At 3 visits per day the developer's estimates would represent a 30 times increase in vehicle movement, mainly at peak hours/rush hour.
2. Visibility sightline to the south on a bend is shown to be inadequate for a 60mph speed limit on an unclassified road with no pavement and a very limited bus service - taking one hour to travel 4.5 miles to Maidenhead and no return journey from Bracknell.

Visibility splays of 2.4 x 215m are required in both directions for a road subject to a 60mph limit (TD 9). This site has less than half of this in both directions (100m to the North (to the opposite side of

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the carriageway – this should be to the same side of the carriageway to allow unobstructed views of an oncoming vehicle) and 75m to the South).

The Highways Authority drew reference in their assessment 16/02861/MAJOR to previous applications (416986 and 417577) to concerns about increased traffic along a road containing several bends with restricted visibility, narrow verges, some of which contain drainage ditches. The applications were dismissed by the inspector. Application 99/34780 included restrictions on vehicle movements which would not be possible with a residential development.

An amended submission by the highways authority on 16/02861/OUT noted that the applicant's commissioned speed counts indicated 85th percentile speeds of c48mph in both directions requiring visibility splays of 139.3m, still significantly more than the visibility splays at the site (75-100m). The Highways Agency though suggested that they were prepared to take "a pragmatic view" and accept the reduced visibility splays due to relatively low traffic levels. There was no explanation or rationale assessment of the reason for the unjustified change in stance by the Highways Authority which conflicted with the views of the Inspector in the previous cases. The Project Centre response to the current application accepts this revised assessment without question or reassessment.

A local resident traffic survey undertaken in March 2017 for the previous application on this site highlighted 249 vehicle movements along the road between the hours of 8am and 9am which was 50% above the figures quoted by the applicant. A development of 18 houses might be expected to generate, say, 36 vehicles leaving the site on to a fast running road at this peak time which the Parish Council do not consider to be "low traffic levels" at the junction and would result in an extremely dangerous site for a junction with inadequate visibility splays.

There is a further constraint which is only going to increase the traffic flow along Shurlock Road from current levels. A new proposal to site 3,500 residencies in adjoining Ruscombe parish which, if implemented by WBC to any extent, will mean a huge increase in commuter traffic from the B3024 through to Bracknell (and back) via Shurlock Road.

A development of this size and nature would result in a large number of families and children on the site. There is a lack of footpaths along the main road and children will undoubtedly use bicycles from this remote rural location. With the reduced visibility splays a development on this scale would, in the opinion of the Parish Council, result in a significant risk to life.

An independent local authority commissioned survey of traffic volumes and speeds along this fast running road must be undertaken as part of the assessment of this planning application.

It should be noted that any suggestion to reduce speed limits to address reduced visibility splays would be ineffective due to the lack of enforcement of speed limits in this rural location. In addition, any suggestion that the junction should be revised to accommodate the development with roundabouts and road signs would harm the character of the countryside (GB2 B).

3. The submission version of the 2013-33 RBWM Local Plan makes clear under policy SP3 "character and design of new development" that it should "respect and enhance the local character of the environment: encourage walking and cycling, deliver easy and safe access, maximise use of sustainable modes of transport, minimise the visual impact of traffic and parking, protect trees,

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provide high quality amenity space and have no unacceptable effect on the amenities of occupants of adjoining properties in terms of privacy, light, disturbance"; of which there are half a dozen who appear not to matter. "Smell" could be particularly relevant with the immediately adjacent intensive cattle rearing farm and adjoining access.

4. The applicant's assessments make no mention of the neighbouring farm. It is of note that a new building intended for or used by livestock, slurry or sewage sludge housing is not permitted within 400m of the curtilage of a dwelling. The curtilage usually means the physical boundary of the land surrounding a dwelling. It is understood that the restriction does not exist in reverse but permission for a development of this scale makes a mockery of planning legislation. This matter is considered in GB2 2.1.17.

This proposal pushes the development immediately to the perimeter of a pedigree breeding working cattle farm that is understood to have existed on the site for 50 years. A development of this scale would put the livelihood of the farmer at significant risk. It would harm the character of the countryside because of the scale and siting of the development (GB2 B1).

Any residential development on the site would need to be completely secure to prevent dogs from straying on to the farm with a minimum 6 foot barrier fence. Neosporosis is an infectious disease of cattle caused by a parasite transmitted in dog faeces, and is the most commonly diagnosed cause of abortion in cattle in the UK. With a breeding cattle farm neighbouring the site, a development of this scale clearly greatly increases risks to the herd. It is understood that cattle are affected by loud noises (such as fireworks etc), which would undoubtedly increase with a development of this scale.

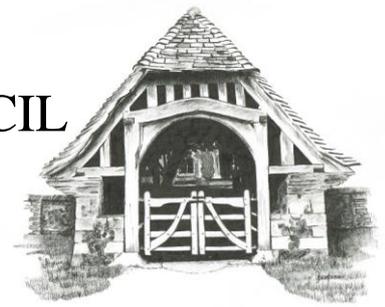
The proposal states that there are only a few adjoining residents who may be affected by the development and therefore the impact associated with the proposals is likely to be minimal. This would definitely not be the case for the neighbouring cattle farm, a key characteristic of open and rural character of the Borough's countryside (GB2 2.1.15).

5. Other matters to note:

- The Environment Agency online flood map illustrates that the site is located within Flood Zone 3. A late submission commissioned and paid for by the Developer argues that the site should be reclassified to Flood Zone 1. Given the undue influence which would be placed on the project manager, Odyssey, to reach the desired conclusion of the Developer, only a detailed assessment by the Environment Agency should be relied on when considering the reasonableness of the reclassification of the site.
- It is understood that local schools in the catchment area are either full or soon to be full with planned intakes in September. The local school infrastructure would therefore not be able to cope with the number of children that would be expected in a development of this scale.
- A development of this scale would result in increased lighting, impacting the rural green belt. GB2 2.1.15 highlights that the use of lighting may have a damaging and urbanising effect on the rural character.
- The application highlights "the previously approved scheme for 3 dwellings proposed the dwelling houses and the hardstanding completely within the footprint of the existing building, however, due consideration has been given through a marketing exercise as to whether such dwellings would be appropriate in the current climate. Further investigation has been

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done since the submission of the last application, and it is still felt that the approved 3 dwellings are not practical for the requirements of the location.” It should be noted that a poor commercial decision by the developer, where a change in economic circumstances means that a scheme is less profitable than first thought, is not a matter to concern the Borough or Planning Officers or a reason to deviate from planning policy.

- On the previous application (no submissions yet received) the submission from Thames Water stated that they had no objections to the development of 20 houses as the infrastructure would not be impacted by such a small additional number of new houses. Unfortunately Thames Water based their response on a paper analysis rather than reality. The villages suffer from overflowing sewage into roads and rising back into houses during periods of heavy rainfall. Thames Water acknowledge the issue and blame the problem on ground water entering the sewage system but have made little attempt to address the problem. As a result any development of this scale would worsen an existing significant problem for the area.

It appears that the “scale and massing” of this housing development in such a cramped and enclosed location (most unlike Honey Lane, Hurley) does not accord with the Borough's SP3 criteria to achieve a satisfactory living environment. It is noted that the 80 square metres of garden area exceeds the built footprint and could result in further domestic development. A TPO on the remaining trees and removal of PDR would be essential to any planning permission which at present conflicts with existing policy GB2 (b) as it represents a "**material intensification in level of activity on the site**", as such cannot gain our approval. It is of note that the protection of trees set out in 99/34780 has been ignored by the applicant with the extensive felling and pruning of trees on the site.

In summary, this site is wholly inappropriate for this number of residential properties for the above reasons, the most compelling being its impact on the openness of the green belt, its impact on the character of the rural location, proximity to a pedigree breeding farm and the position on an inside of a curve in the road which provides insufficient visibility splays and therefore would represent a danger to life.

NB if this application is recommended for approval we wish it to go to Panel and our representations be recorded in full.

Waltham St Lawrence Parish Council
15 January 2018