

# RESIDENTIAL DEVELOPMENT ON LAND OFF WYRE HILL, WYRE PIDDLER, PERSHORE FOR 40 DWELLINGS

Application number: W/14/02399/PN

## Wyre Piddle Parish Council OBJECTS TO THE APPLICATION

These are the comments of Wyre Piddle Parish Council in response to the application resubmitted on Wyre Hill, Wyre Piddle under reference W/14/02399/PN. We would ask that our earlier comments made in respect of W/13/01255/PN, insofar as they relate to the resubmission, are also taken into account.

### **Site Description**

This is a greenfield site in the open countryside.

The site is not adjacent to the settlement boundary of Wyre Piddle. It is in fact separated from it by the Piddle Brook which is a Local Wildlife Site.

### **Local Policy**

This site was put forward for consideration as a location for housing development during the SWDP Consultation Process. However, the request to identify this as a Preferred Options Site was dismissed at an early stage.

This informs us that emerging policy (the SWDP) is consistent with existing policy, specifically Local Plan Policy GD1, and confirms that this site is not suitable for development.

The proposal is therefore unacceptable when judged against local policy considerations.

### **National Policy**

The National Planning Policy Framework (NPPF) provides a starting point in favour of sustainable development unless any adverse impacts would significantly and demonstrably outweigh the benefits.

In assessing impact the NPPF identifies three dimensions: economic, social and environmental, which should not be taken in isolation. Development should seek to positively improve the quality of the built, natural and historic environment as well as improving peoples' quality of life.

#### *Economic Impact*

One would anticipate short term economic benefits in the construction of any development but this would be outweighed by the negative impact upon the Pub, Hotel and B+B's which currently benefit from tourism. This element of the economy would be irrevocably damaged if this small Worcestershire Village were no longer an attractive destination as a consequence of becoming an urban extension to Pershore. The possible short term benefits are far outweighed by the damage and harm to the local economy in the longer term.

#### *Social Impact*

The proposal is separated from the vast majority of Wyre Piddle and is relatively isolated from the few properties on Wyre Hill, with only a single, shared pedestrian and vehicular access into

and out of the Estate being shown upon the plans. This highlights an exclusive rather than an inclusive development which is likely to cause harm to the social cohesion of the locality which has been hard fought for in recent years.

This social dimension will be explored further within our comments under the heading Sustainability.

#### *Environmental Impact*

This site is not environmentally sustainable. Development will lead to a (further) loss of biodiversity and an increased risk of flooding.

Before the Developers decimated the site, it was made up of an old Orchard and an undisturbed floodplain. Given that no Surveys were undertaken before the Orchard was grubbed out, the evidence of the biodiversity of this site was also 'grubbed out'. However, eyewitness accounts tell of deer, badger, hedgehog, fox, bats, slow worm, grass snake, sparrow hawk, woodpecker, kingfisher and heron all being seen on the site, as well as numerous other creatures. Many of these creatures are slowly returning to the site as the vegetation grows back.

It is well documented that otters frequent Piddle Brook in the vicinity of the application site and there is evidence of water voles in close proximity. *Applications W/14/00045/OU Otter and Water Vole Survey and W/14/02571 Ecological Scoping Survey* refer.

More than 12 months have elapsed since the Surveys were carried out on this site and it is considered essential that new Surveys are undertaken to investigate the impact the development would have on protected species currently using the site. This should include Surveys for otter and water vole.

It is noted that no Habitat Management and Maintenance Strategy document has been supplied but this is quite understandable as, until meaningful Surveys are carried out, the Developer is in no position to produce such a document.

The Ecological Report is most confusing as to what access will be permitted to the 'biodiversity area'. If public access is allowed then this is likely to lead to an increased disturbance to wildlife in this area.

The development would lead to a net loss of biodiversity in the locality and would have a harmful effect on the Piddle Brook which is an important wildlife corridor, categorised as a Local Wildlife Site. For these reasons alone the application should be refused.

#### *Impact upon the Historic environment*

It is obvious the developer has little interest in this. This is a resubmission of an application made in July 2013. It was surprising in the earlier application that the desk based archaeological study was only in draft form and it is even more surprising that the resubmission, over a year later, includes the same study, again still in draft form and with no updates.

Whilst the Parish Council is concerned about important material omissions from the study, we do agree with the summary on page 4 of the document which acknowledges the potential presence of Prehistoric and Roman remains on the site.

*“In April 2013 Cotswold Archaeology was commissioned by Bovis Homes Ltd to carry out an Archaeological Desk-Based Assessment of land in Wyre Piddle, Worcestershire. The objective of the assessment was to identify the nature and extent of potential buried archaeological remains within the proposed development site and its immediate environs.*

*This report demonstrates that there is a potential for unknown buried archaeological features to survive within the limits of the site, especially for remains dating to the prehistoric and Roman periods. The proposed development could therefore have an adverse impact on any archaeological assets that do survive within the proposed development site.*

*Based on the available evidence it is unlikely that the development of the site will not lead to ‘substantial harm’ or ‘less than substantial harm’ to any designated heritage assets as defined by the National Planning Policy Framework (NPPF; paragraph 133 & 134)”.*

Unfortunately the study failed to take account of a number of Heritage Assets. It allegedly listed Heritage Assets within 500m of the development site, but it is apparent that a number of Listed Buildings were not identified and also, no mention is made of the Preaching Cross at the junction of Main Road and Church Street. The Preaching Cross is a Scheduled Ancient Monument approximately 250m from the development site.

The application as a whole omitted to take full account of the bridge over the Piddle Brook which is also a Scheduled Ancient Monument and situated in close proximity to the site. The application fails to address how the setting of this Scheduled Ancient Monument will be affected by the proposal or what damage could be done to the bridge during development and post development by the potential increase in flooding caused by it.

*FIGURE 1.1 : Wyre Bridge during 2007 flood event*



As the study has failed to show that the archaeological interest of the site can be preserved in situ and without damage to the setting of a Scheduled Ancient Monument, the development is not in accordance with Wychavon policy ENV 10.

## **ENV10 SITES OF ARCHAEOLOGICAL SIGNIFICANCE**

*Proposals for development affecting national, regional or locally important archaeological sites and their settings, whether scheduled or unscheduled, will only be permitted where proposals can demonstrate that the archaeological interest is capable of being preserved in situ and without damage to its setting.*

The development also has the potential to cause harm to Heritage Assets and as such does not accord with the NPPF.

In the event that this was deemed to be a sustainable location as envisaged by the NPPF, we suggest that the adverse economic, social and environmental impacts significantly and demonstrably outweigh the benefits of the proposal.

## **SUSTAINABILITY**

Notwithstanding the above, the fundamental question arising from the NPPF is whether the site can be considered as being in a sustainable location.

Wyre Piddle has been assessed and categorised as a 4b Village. This means it is not a sustainable location and is in fact, the lowest categorisation of village in Wychavon where development should be resisted. Evidently, the golden thread of sustainability does not run through this settlement.

As we set out within our comments on the original application;

- there is a limited and indeed reducing bus service;
- there is no village shop;
- one cannot easily or safely cycle or walk to shops/services/employment and;
- whilst Schools are within prescribed walking distances, a bus service has to be provided for the children of Wyre Piddle as the routes have been assessed as too dangerous to walk.

There is no contention that there are shops/services/schools in the vicinity but, there are none which can be easily or safely reached by any other means than the car, which is wholly in conflict with the *User Hierarchy* championed by *Manual for Streets*.

The Developer has, quite understandably, shown these services in relation to the site in 'map view' which makes them appear accessible. However, this does not reflect the reality on the ground.

Once again, we ask the decision makers to walk upon the inadequate footpath over the Railway Bridge at the top of Wyre Hill as if walking to School in Pinvin; from the site to the Co-op, the Trading Estate or High School via Wyre Road or endeavour to take the route to the Railway Station. We suggest the Developer should try this too in order to produce accurate data.

There is a Bus Service (the 551 between Worcester and Evesham) and the Developer indicates that there is a Bus every half hour. This statement is mis-leading. Upon studying the Bus Timetable it is apparent that the service is inadequate to easily facilitate Monday to Friday work start and finishing times in Worcester or Evesham. The bus service has reduced and there are

significant gaps in service throughout the course of the day. For example, from Wyre Piddle there is a 7.29 bus to Worcester. The next is at 9.19. Returning from Worcester there is a 17.20 service, which is the last bus to Wyre Piddle. The picture is similar if heading to work in Evesham.

- Please see 550/551 bus timetable at Appendix G of the applicant's Transport Statement

The mainline railway station (Hereford to London Paddington) is in reasonably close proximity however, accessing this by foot is arduous and includes a 30-45 minute walk from Wyre Piddle. If driving to the station, which can take less than 10 minutes, there are serious parking issues which act as a deterrent to this mode of transport. Furthermore, we understand that there are planned reductions to this service also which will limit its efficacy.

The site is not located within a sustainable location and accordingly development should be resisted.

We note that in this resubmission, unlike the original application, the Developer has now acknowledged that Wyre Piddle is a Category 4b settlement. In an effort to overcome this fundamental objection, Appeal Decisions have been highlighted where Inspectors have allowed development in category 4b locations within the District.

However, these Appeals do not relate specifically to sites located close to the settlement of Wyre Piddle and therein they do not provide a sufficiently similar 'sustainability' comparative.

In an effort to compare 'like with like' in terms of understanding the sustainability, or otherwise, of this particular location, we refer to Appeal Decision Ref: APP/H1840/A/14/2214592 which requested consent for residential development close to the settlement of Wyre Piddle, on the same bus route and in the vicinity of the same services.

As the document shows, the Inspector considered the main issue as being whether the site was appropriate for new residential development, bearing in mind national and local planning policy in relation to the location of sustainable development.

Much rested upon whether the *social* dimension of sustainability could be satisfied.

Turning to paragraph 7 the Inspector noted there were some limited services available which could potentially be accessed on foot or bicycle but that these were not of a sufficient range to remove the need for regular car use.

It was noted that the site was very close to a bus stop but even with such ease of access to it, the Inspector thought the 551 bus service to be insufficiently regular to prevent personal car journeys.

Furthermore although other services may be reasonably short in terms of car travel, the Inspector did not consider that these would be easily accessible by more sustainable modes of transport.

This clearly supports the points we have raised above in relation to this location.

As acknowledged in a comparable Appeal, this is not a sustainable location and thus is not appropriate for residential development.

### **FIVE YEAR HOUSING LAND SUPPLY**

Given that the proposal is clearly contrary to local policy and can be seen to be located within an unsustainable location placing it at variance with the NPPF, we suggest that this speculative proposal seeks to exploit the uncomfortable position experienced within Wychavon as a consequence of the on-going debate regarding the Council's Five Year Housing Land Supply. Consequently, close attention must be paid to the golden thread running through the National Planning Policy Framework (NPPF) in an effort to assess if exploitation overrides principles.

Considering paragraph 10 of APP/H1840/A/14/2214592; in this comparable location at a time where some doubt regarding a deliverable five year housing land supply remains, it is apparent that principles do prevail insofar as the Inspector concluded that the location does not represent the sustainable development in respect of which there is a presumption in favour.

The NPPF provided us with a starting point in favour of sustainable development unless any adverse impacts would significantly and demonstrably outweigh the benefits.

This proposal falls at the first hurdle as it has been found to be in an unsustainable location.

Furthermore the adverse economic, social and environmental impacts would significantly and demonstrably outweigh the benefits of it, if it had been found to be in a sustainable location.

### **OTHER MATERIAL FACTORS**

Whilst we suggest that it is conclusively presumed that this is not the sustainable development envisaged by the NPPF and, even if it were the negative impacts significantly and demonstrably outweigh any perceived benefits, there are other significant factors to be taken into consideration.

### **FLOOD RISK**

The flood risk assessment and drainage plan submitted as part of the application has been updated in an attempt to address the wholly unworkable scheme previously proposed, although it appears that the design has not been looked at in any detail and that the ideas are merely principles subject to a detailed design. Therefore the Parish Council still considers that the scheme would cause harm by increasing vulnerability from climate change and increasing the risk of flooding, which is already problematic to Wyre Piddle and Pershore.

The Developer's emphasis appears to be on avoiding flooding **on-site** whereas there is a fundamental requirement to ensure that they do not increase flood risk **off-site**.

Point 5.9 of their Flood Risk Assessment and Drainage Strategy does not reflect reality. The sump at the bridge floods at relatively minor rainfall events, in all likelihood due to a rise in the level of the Brook preventing free flow from the drains. If the Avon backs up, resulting in the Piddle Brook backing up, then any additional run-off will make the situation worse on the only road into and out of the village.

5.11 is again focused on mitigating the **on-site** risk, implying at the expense of the off-site situation; *“Generally any floodwater will be conveyed by the carriageways within the site, and during detailed design, flow routes would be developed and then maintained to ensure that off-site flooding does not increase flood risk on-site...”*

The success of their drainage solution will depend on long term maintenance of the gullies and underground storage and who will have ultimate responsibility for this is unclear? There is an assumption that, should this on-site storage/drainage system fail, the water can run along the road to the east and into the Piddle basin. Though this may solve on-site flooding issues, it is at the expense of moving the problem off-site. To illustrate this point it is worthy of note that the block paved area between Plot 27 and 28-30 has the second storage crating beneath it. This appears to be under un-adopted carriageway and if it overflows it will discharge in an uncontrolled manner (like a waterfall) into the Piddle basin raising the risk of flooding off-site.

6.6 - 6.11 show that all drains still discharge into the Piddle Brook. It is implied that the controlled run-off of 5l/s is a massive improvement on the required standard, however, 5l/s is very widely adopted as the maximum allowed compared with greenfield run-off.

6.8 confirms that the storage tanks are sized to deal with run-off from the roofs and access road only. They suggest that the driveways will be dealt with by using permeable paving, however, 6.5 indicates that soakaways won't work due to ground conditions.

Furthermore they refer to Node references which are on the Avon and do not appear to have any relevance or reference to the Piddle Brook, which is a material omission.

They also indicate (3.2/3.3) that they are building 40 units on 2.2ha implying a low density of about 18.2 dph. In fact the developable area is approx. 1.42ha such that the resultant density is closer to c.28 dph; i.e. it is **not low density**.

We therefore suggest that this is not a workable proposal and if adopted, it will add to the flooding risk and harm already suffered by residents both within Wyre Piddle and beyond.

*FIGURE 2.1 : Proposed “Biodiversity Enhancement Area” during flood event, 2007*



## SAFETY

It is considered that the development would have an adverse effect upon safety due to its location. It would also be fair to say that, following a detailed review of the documents available, the original objection by the Highways Agency and Network Rail's comments on both this and the original application, the developer appears to be comfortable to *further* reduce safety.

### *Highways safety:-*

Reason 5 for refusal of the previous application was that "the scheme fails to preserve highway and pedestrian safety." The Parish Council consider the revised application still fails to do this.

The Developer appears to have ignored the initial Highways objection around access to and from the site. It is difficult to be specific due to the lack of measurements and scale on their plans but the site entrance remains in the same position and of the same size. Their speed surveys were taken over a 3 day period (in spite of them citing this as a "7 day average" figure) in high summer when traffic is somewhat reduced, but even then, the day on day figures show an increase in speed as drivers become aware that the road strips are not designed to catch speeding traffic; in fact, if the figure were extrapolated over a week, the average speed under the 85<sup>th</sup> percentile rule would increase beyond 40mph. It is also worthy of note that during the past year Wyre Piddle Parish Council have had month-long, quarterly use of a vehicle-activated speed awareness sign on Wyre Hill which shows a daily average of 1150 cars travelling in excess of 30mph.

In an attempt to support sustainability as an argument, the Developer has compromised pedestrian safety completely. Their suggestion for a bus stop places the westbound stop in an area where commuters cannot wait as the frontage is privately owned with no footpath at all (see Fig. 3) To further reduce safety, to cross from this bus stop to the proposed site would require a pedestrian to cross at a point with no visibility in the eastbound direction due to both a bend and downward gradient in the road. It is at this very point a cyclist was killed by an HGV in June 2001 due to lack of room and poor visibility on the bend.

*FIGURE 3.1 : Proposed location for westbound bus stop*





In addition to this, in order to try to persuade the planning authority that the PROW is an effective footpath, they expect pedestrians to stand on the driveway of 'Sunnymead' to cross the road at a point east of a curved humpback bridge where motorists and HGVs are travelling from a 40mph speed limit (we have already established they are travelling at least 38mph further down the road where they are slowing) on a downhill gradient whilst watching for oncoming traffic due to the narrow nature of the bridge. This supposedly appropriate and safe crossing point was, earlier in 2014, the scene of an accident whereby a Light Goods Vehicle was unable to traverse the bend effectively and ended up in the hedgerow.

*FIGURES 4.1 – 4.2: Proposed crossing point to access public footpath to industrial estate*



*FIGURES 5.1-5.3: Accident site, opposite 'Sunnymead', 2014*



If the pedestrian can successfully cross the road, they then have to be capable of climbing a stile, before descending the proposed steep steps (currently a muddy, sheer drop embankment-see fig.6.2 at Appendix) which has no lighting at all and following an unlit, un-surfaced path into an industrial estate that has two large haulage companies operating. In addition to this their Transport Statement refers to a 1m wide footpath at the front of the development; the footpath from 'Lyncroft's boundary to the site entrance is actually 90cm, including the 10cm kerbstone.

This is difficult enough for an able bodied person to walk, impossible for either two people or a dog walker without stepping into the gutter and it cannot accommodate a pushchair or wheelchair at all. To widen the footpath would mean to infill a culvert that currently alleviates some of the surface water running down Wyre Hill.

*Please see photographs of the public footpath from Wyre Hill to Pershore Trading Estate in the attached Appendix.*

#### *Rail safety:-*

Reason 7 for refusal of the previous application was that “The proposed development will cause an increase in the use of the level crossing at the adjacent railway line which will have the distinct possibility of importing additional risk to railway safety.” In attempting to mitigate this, the developer claims that Network Rail “has since reviewed its previous comments and has withdrawn its’ objection” yet Network Rail have commented on this resubmitted application, upholding their objection as they consider that development here WILL cause an increase in pedestrian usage which WILL import additional risk to railway safety. Network Rail clarify that, contrary to the claims within the Transport Statement, the crossing is NOT solely for vehicular use and point out that the route across the railway line is a designated public footpath. Network Rail estimate that the crossing is currently used around 10 times per day; with a 600% increase of households on Wyre Hill this figure is bound to rise significantly.

#### **DESIGN AND SOCIAL IMPACT**

The proposed design is more suited to an urban setting than a rural one and does not appear to take account of or be in keeping with the predominant local and existing building style of Wyre Hill which dates back to the beginning of the last century and in the case of May cottage to the mid-17<sup>th</sup> Century.

The proposal would result in a cramped, poor quality environment where the amenity for the intended occupiers will be compromised in terms of light and privacy.

Contrary to the findings in the LVIA report and Update, the introduction of open ground on site to locate the underground water storage tank has been to the detriment of the scheme. To accommodate this storage tank, many of the original larger plots have been divided and reduced in footprint to achieve the mix of forty units. This has overall resulted in a more cramped internal environment, less private space, smaller gardens, less opportunity for off-street parking and an unnecessary reduction in amenity. With the increased density of units being concentrated along the perimeter of the site the visual impact has changed and is not in keeping with the rural character of the area.

Issues regarding sound pollution and vibration from the immediately adjacent preferred HGV route and railway track along the majority of the boundaries to the site should also be a cause for concern as should air quality and summer airborne pests due to its proximity to the Throckmorton landfill site.

The flats and smaller rental properties are concentrated in the most confined and problematic portion of the site in terms of proximity to both noise and vibration, being closely boarded by the B4083—the preferred HGV route—and the railway line which is raised at this section. They are divided from the rest of the site by the access road and screened away with planting (zoned). At

the opposite corner of the site are the only other rental properties along with the Shared Ownership properties with delineation from the market housing properties. This approach to laying out the site clearly creates internal segregation.

There are no bungalows and any ground floor accommodation which may be suitable for disabled persons unable to manage stairs is limited to the flats in the rental only area and these have no private gardens.

The stock building approach and use of materials that the Developer proposes is so insensitive and nondescript that it would only detract from the uniqueness of this tourist attracting rural location. An example of this can be found in the proposed buildings which comprise Units 1- 4; flats would be a departure not in-keeping with the existing houses directly across the road, being taller at the ridge line by a metre and larger in mass. These Units are set almost directly on the verge instead of being set back approximately 15m as all the existing houses on Wyre Hill are. This will have an unacceptable negative impact upon the amenities of existing neighbouring properties and the prospective residents alike. Bedrooms, living rooms and kitchens will be directly overlooked from the development with loss of privacy and natural light.

The site section drawing, which has mislabeled sections, does not show the site contextually in terms of scale and massing of the proposed units in relation to the existing built environment and the general overall cramped layout fails to reflect the rural character of the site. It should also be considered that a previous application on this site for *only three houses* was refused and again turned down at appeal due to the fact that development here “would harm the rural setting of the settlement.” (Ref: Application no. W/88/1166/0).

The boundary along Wyre Hill (B4083) is a fence indicated to be between 0.9 – 2m high; this shows a lack of active street frontage and detailing which is particularly highlighted at the entrance to the development. Proposed fencing and screening to the boundaries of ‘Lyncroft’ and ‘Elm Croft’ are not clearly indicated and are not currently possible because of existing planting. An example of this is Unit 36 which sits next to the boundary of ‘Lyncroft’-no space has been allowed for the existing conifer trees in this location.

No indication of street lighting has been provided; a proposed lighting scheme should be provided and needs to demonstrate that the amenity to existing properties will not be affected. However the site entrance would certainly have to be lit and would directly affect the residents of ‘Windy House’ as this junction is directly opposite all principal rooms of the house. This residence will be particularly affected by headlight illumination and noise from vehicles entering and leaving the development. Further light spill and noise originating from the site should not affect the existing residences and the Developer has failed to address satisfactorily.

*Indicative examples of poor quality design and approach to planning solutions:-*

Units 1 – 11:

All units will receive poor natural light especially into the ground floor because of the short distance to site boundaries and the height of existing screening.

Units 1, 2, 3 & 4 are shown at a distance of approximately 1.5 metres away from the boundary fence. Construction of these units would require the felling of existing established trees.

Units 8, 9, 10 & 11 are North-facing and are shown at a distance of approximately 2.3m away from a 1.8 – 2.5m-high solid fence.

Units 3,4,5,8 & 9:

The close proximity of the kitchen windows of these units to the communal bin stores raises a clearly unacceptable health hazard to residents year-round and particularly during warm and wet conditions. There is no guarantee as to whom or to what standard all on-site communal bin sites will be maintained; this should be of concern.

Units 1 – 5:

These units are shown at approximately 2m from the site boundary; this is adjacent to an unmaintained field drainage ditch which is not included in the development.

Units 7 - 11:

Disturbance from vibration and noise caused by the close proximity to the railway line has been acknowledged and whilst requirements have been put in place for sound reduction, this will only be effective when windows to units are closed. No consideration has been given to future planned improvements to the rail network which are likely to include an additional track line closer to the settlement.

Units 8 – 23:

Undirected runoff water from these units will drain towards the Northern boundary and the railway embankment. This raises concerns with regard to the long-term possibility of erosion and destabilising of the embankment.

Units 22 – 25:

Fence treatment to the rear of the properties is unclear-are they to be left open to the railway embankment and the biodiversity area?

Units 23 -30:

Buildings, garages and gardens fall within 10 -20m of Flood Zone 3a.

Units 1 – 11, 14, 15, 17 – 20, 28 -32, 38 & 39

These Units all appear to have only single car parking provision which would necessitate the need for on-street parking for additional cars. This need is particularly concentrated in the area at the entrance to the site. There will be a number of additional unconsidered family cars, trailers, caravans, visitors and servicing on the development that will also lead to inevitable on-street parking. This, in turn will reduce lines of sight which will be problematic, given the width of the road, for access to driveways - especially where driveways to properties abut one another - and for articulation through the site, which may not be sufficient to provide safe access and turning circles for emergency and service vehicles. Furthermore we question whether the garages provided on site are of an adequate size for a modern car. Are they more likely to be used for storage space rather than for off-road parking?

We therefore suggest that the Design of this development is ill-conceived and of poor quality and would consequently be harmful to the rural setting and to future and existing residents of the area.

## CONCLUSION

When balancing the impacts of this proposal against the Developer's assumed presumption in favour of it we ask whether the Developer has:

- engaged in a creative exercise in finding ways to enhance and improve the places where people live their lives;
- sought to secure high quality design and a good standard of amenity;
- recognised the intrinsic character and beauty of the countryside;
- taken full and appropriately measured account of the flood risk; and
- realistically considered the use of sustainable modes of transport;
- sought to positively improve the quality of the built, natural and historic environment as well as improving peoples' quality of life?

The answer to all of these questions is 'no'.

The District Council is under an obligation to deal with planning applications in a positive and proactive manner. However, Bovis Homes is apparently under no such obligation, judging by its total lack of engagement with the community in connection with this application.

Whilst the Developers have attempted to overcome the previous objections and 9 grounds for refusal on paper, it is apparent that little, if any, work has actually been undertaken. Some of the suggestions put forward in the application appear ill-considered and could in fact put peoples' safety at risk.

In accordance with the National Planning Policy Framework, once again we find this application to be severely lacking in accuracy and integrity, falling contrary to all core principles set out within the NPPF.

This is not a sustainable development proposal and, even if it were, it provides no discernible benefit in terms of the economic, social and environmental roles against which it must be judged. Indeed, our findings have shown that it will cause significant harm.

There is nothing within the proposal which will improve the quality of life within our community or within the locality. Here again, our findings suggest it will cause significant harm.

There has been a total disregard of local policy and no account has been taken of the core principles of the NPPF.

The major concerns of Wyre Piddle in relation to this proposal are that:

- It is a green field site in the open countryside
- It is outside any development or settlement boundary
- It is in an unsustainable location
- It has a negative impact upon the local economy, society and environment
- It presents a flood risk
- It is of poor design
- There are Highways safety implications
- There are Rail safety implications

This resubmission remains fundamentally flawed and Wyre Piddle Parish Council trusts that Wychavon District Council will not waste limited time and resources on this poorly conceived application and refuse it at the earliest possible opportunity.