Bausley with Criggion Community Council
/ Cyngor Cymuned Basle hefo Chrugion

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17th June 2024

Dear Mr Lloyd

Reference: Pre - Planning Application for a Residential Development Of 30 Affordable Dwellings on Land North of the B4393 and West of Oakland, Crew Green, Powys

As requested at our recent meeting on 10th June 2024, I have collated the views of the attending members of the public and that of the Community Councillors and have listed the issues raised, please can these all be included in your pre application response?

Planning Application

- Error – Land is shown as SY5 9FF but we believe it to be SY5 9AT?
- Error – despite being behind a hedge this development WILL be seen from the road if constructed?
- Error – We believe an existing footpath, may be affected by this proposal
- Error – Waste storage and collection – why do the plans not incorporate this aspect as most households require 2 – 4 separate recycling bins / wheelie bins – 30 houses equals possibly 120 assorted refuse bins?
- Error – the ownership certificates are shown as blank – but ownership must be known
- Error – The agricultural holding certificate has been left blank?

Planning Statement

- Background to Development – Although Powys have indicated Affordable Housing at this location is “policy compliant”, this also means that this land is NOT suitable for any other development, and our view is this application is trying to take advantage of a loophole
- Error – States Crew Green is on a “Strategic Main Transport Corridor” – we fundamentally disagree – A458 at least 6 miles East and A483 is at least 5 miles West?
- Error – States we benefit from a number of community services and facilities – we have a primary school and a basic bus service 10am – 2pm. NO Community centre, NO village pub, NO other services or facilities?
- The Recreation Allowance appears totally sparse and inadequate for potentially 30 young families with children, again no infrastructure benefitting residents suggested.

- Movement – as stated above, this statement is completely untrue. There are no community facilities other than a school, the daily bus service is totally inadequate for those needing to work, attend college or medical appointments. The encouragement of walking / cycling is not practicable as there is a lack of footpaths meaning pedestrians walk on the verges and the road is a 50mph limit – these are all safety issues,

- Access – The residents of Severn View object strongly to this entrance being used as all the traffic entering the development will pass by them 24/7. Any overflow will mean additional vehicles from the development will be left unattended outside the properties of Severn View. Furthermore, each day will mean approximately 50 vehicles trying to enter and leave Severn View at peak times onto a 50mph road.

Planning Policy Framework

Planning Policy Wales

4.2.1 - Planning Policy Wales Edition 12 was adopted in February 2024 and is the key national land use planning policy document for Wales. Planning Policy Wales (PPW) sets out the Welsh Government's land use planning policies with the aim to translate the Government's commitment to sustainable development within the planning system. This is highlighted in the Introduction at paragraph 1.2, which details that the "primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales", this should be considered during plan-making and decision-taking

Community Response - This development's location, does not seem to meet the "*Primary objective of the PPW to ensure the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales"* in that it stretches our community even further towards Coedway – virtually merging with it, thereby fracturing the identity of Crew Green and impacting on our social adhesion.

It does not clarify whether Barcud Housing Association will be catering solely for Powys residents and specifically those within our Ward or immediate local area (3 mile radius) and is likely to bring people across the border from Shropshire. This influx of people outside Powys may negatively impact on the social and cultural well-being of Wales.

4.2.2 PPW provides a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise (paragraph 1.18). In this regard, it details that Local Planning Authorities should ensure that the social, economic, environmental and cultural benefits of a proposed development are considered in the decision-making process, recognising that, in doing so, there may be occasions when one benefit of a development proposal outweighs others:

Key factors in the Local Planning Authority's assessment process include Economic Considerations, Economic considerations include the contribution the proposed development makes to job creation, the growth and regeneration of the local area and the achievement of a more prosperous, low carbon, innovative and resource efficient Wales

Community Response - How does this development offer any of this? – "*job creation, the growth and regeneration of the local area and the achievement of a more prosperous, low carbon, innovative and resource efficient Wales*"?

- The application clearly shows that NO local jobs will be created.
- There are NO facilities other than a primary school to be affected by "*prosperity*",
- The impact of potentially 60 more vehicles, the increase of recycling / refuse and Powys services to maintain them etc will impact on "*Low carbon and resource efficient"* requirements.

Social Considerations

Social considerations include "the contribution the proposed development makes to meeting society's needs (including housing), how people access employment, services and facilities and how they interact on a daily basis".

Community Response : –

Affordable Housing may be needed in the area however, it must be noted, that at this public and well publicised meeting, it did not appear that anyone who might be in need of affordable housing was present. It would not be unreasonable to expect those in desperate need of a house of their own, to either rent or buy, to come to argue their case in support of the development as did the large number who raised questions against it.

Consequently, this brings into question the argument made by Developers for the need for 30 additional affordable homes given there will be Affordable housing on Waterside Meadow, and 2 Affordable houses are supposed to be included on Severn View. Furthermore, Powys CC are building 12 Affordable houses locally in Llandrinio.

A large development at this proposed site effectively stretches our community out further, away from its core geographical location, in continued Ribbon Strip development thereby stopping a cohesive Village / Community spirit and stripping identity of an area (joining Coedway and Crew Green) which limits "Interaction on a daily basis" is NOT the way our Community want to proceed.

Our interaction with the Community clearly identifies a desire to interact within a closer, Village, Community based focus, drawing residents together not pushing them further apart, this development does not meet the society's needs of the Crew Green Community.

The access to employment can be only undertaken by private transport as the bus service is virtually useless to employees as it runs inside of employment times, thereby preventing people accessing employment, services, colleges, and medical appointments.

In addition to the responses to the documentation submitted, the community also raised the following issues:-

- Why was no one present from Barcud Housing association, we were informed there had been insufficient notice to find someone able to attend. (Berry's were informed of this meeting on 31st May 2024),

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- Attendees were frustrated that a representative from Barcud had not attended, as this Community meeting was a fundamental step in explaining the development and gaining support and suggested to the attendees that their views were unimportant to the process.
- This view is felt more deeply as since the meeting you have not even supplied the "Barcud" statement as requested – surely this is a public document having been read out at the meeting?
- Despite asking for contact details with Barcud – nothing has been supplied? These omissions do not support "working together",
- The figures quoted in the application regarding numbers of people seeking affordable housing were immediately questioned by attendees who had spoken with Powys CC regarding those on the waiting on the list which seemed to highlight discrepancies and did not make clear who was actually eligible from within our community or immediate close area i.e. within 3 miles of our Ward?
- It was not clear who was eligible for housing, and would these people come from within the community or immediate vicinity, or would families come from outside the area?
- Who had established what number of each type of dwelling was required, and based on what evidence?
- Why were there no bungalows included in the calculations, in view of the aging demographics?
- The proposed entrance being through the houses at Seven View which would mean a potential 60+ vehicles trying to exit one drive onto a 50mph highway at peak times,
- Why was there not an alternative entrance exit?
- Parking allocations appeared unrealistic with 1 car allotted to one bed properties when in all likelihood these properties could have two occupants?
- Overflow parking spilling out onto the road and verges in front of the properties at Seven View?
- No apparent visitor parking – causing more congestion?
- The allocated "open space" not being big enough for the amount of occupants?
- No play equipment / activities for residents?
- No offer of adding any infrastructure to the community?
- The road layout being obviously designed to end at the back of the development, thereby becoming easy access to the unused land behind this affordable housing – suggesting more development once the affordable housing was established as a precedent?
- Residents asked if Berry's or SJ Roberts had produced any plans at all - even rudimentary - that showed further development in the remaining northern half of the field, whether for more affordable housing, open market housing or indeed anything else?
- What was potential street lighting – affecting the "dark Skies" policy promoted by Welsh Government?
- Drainage – repeatedly informed that local sewage system is up to capacity?
- Water supplies, the reservoir at Bausley needed to be topped up by Bowsers, throughout summers to service existing housing at Crew Green?
- How are "new" properties safeguarded so that they are not bought and sold on at an inflated price. We are close to English border would future residents be from England rather than serving the people of Wales?

- Although the plan has given each house parking in line with current regulations, in a village that is half-an-hour by car to anywhere, a large percentage of these houses are going to have more than one car. In a household with older teenagers, there could be as many as four cars to a three bedroomed property?
- Concerns over the 'potential' for pollution to impact the River Severn, from run off, household litter / contamination etc?
- Existing footways between the proposed site and the school are available, but they are very narrow and not continuous (i.e, one has to cross the B road, in places, in order to continue along a designated footpath (sidewalk)?
- The B4393 road speed for that area is 50mph and will make no impact on drivers sticking to the limit?
- Neither the village's current wastewater system, nor fresh water supply, can cope with the extra houses?
- Social considerations: The proposed development may meet society's need for housing, but how does it meet society's needs regarding employment, services and facilities?

Land Ownership / History

Although the Community Council understands that this Pre-Application is seeking views on the development itself, we feel that the following issue is a fundamental one that ***must*** be considered in the responses as it underpins trust, intent and faith.

Land Registry at 10th June 2024, shows the owner to be Salop Leisure, the developer of the 8 houses (6 completed) on the adjacent site - Seven View - and from where the access to the new site would travel through. Neil Jones (SJ Roberts) confirmed that the land was NOT owned by Salop Leisure but belonged to a third party. This third party is Mark Bebb – a Senior Management figure at Salop Leisure

The ownership of the land is extremely pertinent to this application and the Community as during the application process for the adjacent site – Seven View, Community Councillors had met with Mr BYWATERS the CEO of Salop leisure in October 2020 to address several issues. Incidentally Mark BEBB was supposed to attend this meeting but was unable to due to heath concerns

The issues included: -

1). The attempt to divide two houses on the pretext of bigger gardens, but which in fact left a potential roadway to the land behind – the land subject of this Pre-Application Notice.
2). The attempt to reposition 3 bungalows - previously applied for to be sited at the entrance of Salop Leisure - to join on the end of the development at Seven View on the pretext this would make sense and reduce construction costs. If supported by the community Council it would have allowed 3 bungalows to be placed on land outside the Local Development Plan, thereby setting a precedent for this land to be developed further - the land subject of this Pre-Application Notice.
3). Community Councillors believed that development of 11 properties would need to incorporate Affordable housing, but by having 8 properties at Seven View and 3 bungalows on the adjoining land this meant that the development was 8 + 3, but NOT subject to affordable housing and appeared to be a deliberate attempt to bypass this requirement.

In addition to these issues Councillors informed Mr BYWATERS at the time and later in email to both Mr BYWATERS and Mr BEBB that: -

- This land was outside the Local Development Plan,
- Was a continuation of Ribbon Strip development, ultimately joining Coedway to Crew Green,
- Did not assist or improve in forming a cohesive community at Crew Green,
- Gave nothing to the Community that only had a school and no other infrastructure,
- And ultimately would not be supported by the Community Council.

Residents openly stated that this appeared to be a "back door" method of developing land that had been clearly shown to Salop Leisure and in particular Mr BYWATERS and Mr BEBB to be undesirable to the community.

In 2023 Powys responded to the Pre-Application, stating "*Open market housing could not be supported, affordable housing on the site is policy compliant".* Attendees highlighted that in effect, the only development and financial option for a developer / landowner, was Affordable housing, and therefore developers were seeking to financially exploit the only loophole available to them.

Attendees made it clear that they felt there was extensive history regarding this land and attempts to circumvent a process that was purely for financial gain of persons connected to Salop Leisure, who were living out of the area and did not benefit the wider Crew Green Community.

Homeowners of Seven View – developed by Salop Leisure and SJ Roberts stated they had specifically bought Executive houses with clear land around them throughout 2022 and 2023 and were now faced with 30 immediate properties that would be driving in and out of a driveway designed for 8 houses. They believe they should have been made aware of this potential development and that plans to sell / develop this land were clearly in place well before (Berry's site plan dated July 2022) they had completed their purchases and why this information was not made clear to their Solicitors during conveyancing by SJ Roberts / or Salop Leisure

A clear indication of this prior knowledge was the meetings with Mr BYWATERS in October 2020 and the date on the Berry's site plan showing July 2022, which clearly displayed prior knowledge of Salop Leisure / Mr BYWATERS and Mr BEBB, the new and recent owner of the land.

Attendees felt that this was clearly displayed in the actions listed and that it appeared in particular, that the residents of Seven View had been deliberately misled.

The community Council have also noted that concerns had been raised to Powys Planning Enforcement as it appeared that only 6 of the 8 properties had been constructed and amongst other things the site plan appeared different to that allowed, and there were concerns that the development had been built differently to that authorised. Notably the 2 missing properties, immediately border the new proposed Barcud development which led attendees to wonder if this was part of the long-standing plan to include them in the new development away from the 6 executive houses.

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As stated above, the Community Council understands that this Pre-Application is seeking views on the development itself, BUT in view of the information above, we feel that the history of attempted development of this land, and the attempts to circumvent planning safeguards, totally undermines community confidence and support in developments at this site, reinforcing the belief that there is minimum benefit to our community from financially driven property speculators.

In summary, the only positive comments made at the open public meeting was that affordable housing needed to be considered, but it should be primarily for local people in the Ward. It was agreed that a development would likely add to the School Student population which was regarded as a positive

However, the consensus was: -

- There was no wish to elongate the village any further, and that this location was not right to improve or develop a cohesive community feeling and spirit,
- Ribbon strip development did not improve the social, economic and cultural wellbeing of our community at all and offered no benefits,
- Furthermore, there is no infrastructure within our area to support this project, there are No immediate dental or GP Surgeries within our Ward, and doctors / dental surgeries outside our Ward are at capacity,
- The suggestion that Crew Green is on a “Strategic Main Transport Corridor” was seen by many at the meeting as laughable and very disingenuous for the reasons stated earlier.

It was suggested that if this development, or a form of it was considered on a different site within our Ward, it may get far more support, but this development seems to offer little to Crew Green and its residents and there are better sites to choose.

As stated, the overall consensus was that this was purely financially driven and attempting to force a project through via a policy loophole rather than being of benefit to our Community.

Crew Green would be elongated and more disjointed and lose any Community identity to residents who already have virtually NO infrastructure and historically have felt like the forgotten corner of Powys due to our proximity to the English border.

I hope you will be able to include all of this information in your Public Consultation Response.

Yours sincerely

Steve Eccleshall
Clerk to Bausley with Criggion Community Council