

The Parish Council have asked that this be registered as their comment:

**Application Reference:** 25/02687/FUL **Location:** Land to the East of Willersey Business Park, Willersey **Proposal:** Erection of 60 Dwellings

This is one of two current planning intentions for a total of ninety houses in Willersey and we are expecting another application for thirty shortly. Although we realise that each planning application is considered separately, we would ask that CDC consider the impact of cumulative approvals for build on the village.

We would also like to engage with the Council regarding the proposed Local Plan and understand that current planning applications will not be considered as part of the future proposed allocation. Willersey Parish Council requests CDC to pause any further planning decisions whilst the Consultation on the Local Plan takes place, so local people and their representatives can discuss future development with CDC and make strategic, rather than damaging piece meal decisions.

Willersey Parish Council is aware of the above application and, having engaged with the developer and considered the proposals in light of community concerns, hereby wishes to register its **formal and robust objection** unless fundamental infrastructure and safety concerns are fully mitigated.

While the Parish Council acknowledges this site is identified within the Local Plan (W7A/WIL-EC1) and welcomes the amendments made—including the proposed housing split and the allocation of bungalows, social, and affordable housing—we assert that the application fails to meet key tests within the National Planning Policy Framework (NPPF 2024) and the Cotswold District Local Plan (CDLP).

#### 1. Flooding, Foul Sewage, and Surface Water (NPPF 170; CDLP EN14)

The Parish Council deems the lack of capacity within the existing sewage and water systems to be of **primary importance** to the health and wellbeing of our residents.

- **Foul Sewage Capacity:** Frequent flooding of both rainwater and untreated sewage is experienced in all parts of the village. Foul sewage has, on many occasions, reached the watercourses of Badsey Brook and its culverts.
- **Inadequate Pumping Station:** The **Badsey Lane pumping station is completely inadequate** for the existing housing stock, let alone a further 60 properties. Severn Trent has already instigated a **Grampian Condition**, confirming their present inability to upgrade the system necessary to service this development.
- **Water Supply Network Capacity:** The Planning Statement is silent on this critical issue. The **Thames Water Comments** on a comparable local application (25/02983/OUT) officially confirmed the *"inability of the existing water network infrastructure to accommodate the needs of this development proposal,"* requiring network upgrades **before** occupation. This confirms that the necessary infrastructure is **not currently available**, placing an unacceptable risk of no/low water pressure on existing residents and directly contravening planning policy.
- **Non-Compliance:** The lack of essential infrastructure is **detrimental to the health and wellbeing** of residents, and unless fully remedied, the application fails to meet the needs of **NPPF 170** and **CDLP EN14**. Evidence of flooding has been previously submitted.

## 2. Highway Safety and Burdensome Traffic (NPPF 96; NPPF 109)

The issue of Highway Safety, raised by both the Parish Council and residents, represents the second critical barrier to this development.

- **Hazardous Access Location:** The proposed access route is situated on the B4632 at a **blind bend** with no current footway. The B4632 is known for considerable speeding, with traffic often exceeding the 30 mph limit approaching the village.
- **Poor Visibility:** There is a poor line of sight in both directions. Approaching the village from the Stratford direction, vehicles travelling at speed will have **little or no visibility** of a vehicle attempting a right turn into the development. Conversely, traffic exiting the village frequently accelerates towards the 40 mph zone, creating risk for vehicles turning left. The application does not **fully address** this safety deficit.
- **Conflict with HGV Movements:** This stretch of road is also designated for the egress of large HGVs from the adjacent Autosleepers site (under granted planning application 22/0654/FUL). The proximity of the proposed access road to the Autosleepers egress will lead to a **direct conflict** between HGV traffic and the development's residents.
- **Traffic Burden:** With 60 properties, there will likely be at least 120 additional vehicle movements per day along a section of the B4632 that is already **overburdened** with HGVs avoiding the congested A44 and A46, using Willersey as a **rat run**.
- **Unsustainable Transport:** All essential facilities (shops, health, secondary schools) are at least two miles distant, necessitating car use. Public transport is infrequent and the nearest stop is over 500 metres away, requiring residents to cross the **Badsey Lane/Pike Corner roundabout**, a known accident blackspot. This contradicts sustainable transport policies and fails to comply with **NPPF 109**.

## 3. Design, Community Facilities, and Noise (NPPF 104; NPPF 134; CDLP H1, INF7)

While the design is generally compliant with CDC guidance, significant concerns remain regarding the deployment of amenity space and the impact of adjoining land uses.

- **Misuse of Amenity Space:** The proposed playground is considered redundant, given the village already maintains a comprehensive play area within 500 metres. Furthermore, its placement adjacent to a SUDS pond poses an **inherent danger** to small children.
- **Loss of Allotments:** The proposed development has resulted in the loss of much-used allotments for village residents. The Parish Council suggests the amenity space could be better utilised to replace these lost allotments. This loss of facility is a further erosion of community amenity which should be addressed.
- **Noise Impact:** Concerns regarding **Noise generation** from the expanding Willersey Business Park (Autosleepers) remain **unmet**. The Noise Impact Assessment provided is insufficient as it was undertaken *prior* to any expansion work. The proposed 'bund' and non-overlooking windows are not felt to be sufficient protection from the noise, which, under certain climatic conditions, is already audible across the village. The imminent expansion means the noise impact will rise, which is likely to be **detrimental to the health and wellbeing** of residents.

#### 4. Wider Infrastructure and Sustainability (NPPF 96, 98, 100 101; CDLP INF1)

- **Reliance on Neighbouring Authority:** The lack of employment opportunities and essential services within the village necessitates that many residents must travel into the **neighbouring local authority area of Wychavon** in order to shop, work, and access medical services (such as those in Broadway and Evesham). This reliance on cross-border travel, almost exclusively by private car, highlights the unsustainability of the location.
- **School Capacity:** The local primary school is **approaching capacity in most year groups**. Consequently, the influx of families from 60 new dwellings will likely exceed remaining capacity, necessitating that children be transported by vehicle to the nearest available location (potentially out-of-county). This adds strain to educational transport budgets and increases vehicle movements on an already stressed network. The nearest secondary school, Chipping Campden, is also heavily oversubscribed.
- **Health Access:** All necessary health facilities are at least 3 miles distant. Accessing the nearest doctors in Broadway requires crossing the A44 (a 60 mph road), which is not safely accessible on foot.
- **Cumulative Effect:** This development, coupled with applications at Folly View (25/02983/OUT) and the expected proposal at Willow Green, will **almost double the size of the village**. Given CDC's position that Willersey is **not a principal settlement**, the Parish Council asserts that this is **not a sustainable location** for large-scale greenfield housing.

#### 5. Landscape, Heritage, and Biodiversity (NPPF 187, 189 & 190)

- **AONB and Landscape Impact:** The Planning Statement correctly notes that the site is *outside* the AONB but, given that the AONB is immediately to the south, it does lie **within its setting**. The development should be assessed with **great weight** given to conserving scenic beauty (NPPF Paragraphs 189 & 190). While the proposal includes a landscaped edge, the scale and design must be rigorously scrutinised to prevent the **gradual, irreversible erosion of the AONB border** and avoid coalescence with Broadway, which threatens to turn Willersey into an "**urbanised satellite**."
- **Heritage and Archaeology:** While the site is distant from Listed buildings and the Willersey Conservation Area, and the applicant states that archaeological investigations found "nothing considered to be of archaeological significance," the application **lacks a full Heritage Statement** to address the site's setting adjacent to the historic settlement. Furthermore, the Parish Council disputes the dismissal of archaeological potential; the 2017 assessment recommended on-site work which does not appear to have been satisfactorily completed. Given recent finds in the locality (including swords and potential Roman remains), this oversight must be rectified.
- **Biodiversity Net Gain:** The proposed net gain appears **overstated**. The land is currently greenfield used for rural domestic activities (including the lost allotments). To replace this with limited planting, while tarmacking large areas, is not considered a genuine environmental or wellbeing gain for the village.

- **Dark Skies:** The majority of the village has no street lights. We are concerned that lighting associated with this development will add to existing light pollution, conflicting with the AONB's promotion of the **Dark Sky ethos**(NPPF 15). Any lighting must be strictly low-key to retain the village's rural character.

In summary, while the Parish Council wishes to support the provision of housing, the substantial, unmitigated concerns regarding **sewage and flooding capacity, highway safety, and the lack of essential social infrastructure** constitute clear contraventions of the NPPF and outweigh the principle of development at this time.