

David Kenyon
Planning Consultant – Development Management
Service Delivery
South Somerset District Council
Yeovil
BA20 2HT

Sent via Email

10th March 2020

Dear David,

RE: Formal Request for Extension of Time – Outline Planning Application for the demolition of existing buildings and residential development of up to 80 dwellings including the creation of a new vehicular access and pedestrian accesses, open space, landscape planting and surface water attenuation (all matters reserved except access) – Ref:19/03416/OUT

Thank you for your email of the 28th February and for the opportunity to meet on site on the 3rd March. It is clear that the target date for determining the application, which is the 13th March, will not allow sufficient time to satisfactorily resolve the outstanding issues, which based on our conversation are related to the following:

1. Heritage,
2. Highways,
3. Scale of growth; and
4. Landscape & Visual Impact.

As set out below we believe concerns raised by Historic England and Somerset County Council (SCC) Highways can be resolved promptly and have already made significant progress with both of these statutory consultees.

Further detail is set out below however it is our contention that the above matters can be resolved with a short extension and therefore in accordance with Article 34 of The Town and Country Planning (Development Management Procedure) (England) Order 2015, we are formally requesting an extension of time until the 8th May 2020, to determine this application. Such a request is not unusual and given the progress we have made in a short space of time, an extension would represent a positive approach to planning as advocated by the NPPF and we would look to work actively with yourself through this extension period.

1. Heritage

You have suggested that heritage issues should have been resolved at pre-application stage. However, the Council's pre-application letter dated 22nd October 2019 states that the planning officer would consult Historic England and the Conservation Officer on receipt of a revised layout (which we submitted 13th November 2019) but it is not clear whether this consultation ever took place. We did

actually seek input from the conservation officer directly ahead of submission but unfortunately no feedback was received. We therefore submitted on the basis of our own heritage advice.

The Historic England concern focuses on the potential impact of the proposed development on the setting of the listed Manor House and considers that the layout will result in harm, contrary to paragraph 194 of the NPPF. In their recommendation, Historic England recognise that this identified “harm” could be lessened with a revised layout stating that they *“are convinced that a less harmful layout can identified within the application site that will allow for a more meaningful buffer to be created to the grade II* listed Manor House. In our view, alternative layouts, avoiding development in the north-west section while retaining views through the wider countryside, would significantly minimise the impact to the highly designated asset (Para 190, NPPF)”*. Historic England are quite specific about their concern but do not consider that development of the site is not inappropriate.

Following receipt of their representation we have been liaising with Historic England and have revised the layout to take into account their concerns regarding the impact on setting. This is attached and is formally submitted as a revised drawing. As you will note, we have removed units to the rear of the listed building and now propose a substantial buffer around the listed building to protect its setting. Historic England have verbally advised they are comfortable with these revisions and they are now awaiting their formal opportunity to comment on the revised layout through the application process. On this basis, we consider that this outstanding matter can be progressed to a positive outcome with an extension of time allowing the statutory consultee to formally comment.

2. Highways

As with Heritage, in your email you have suggested that we should have sought to resolve issues raised by SCC before submission of the planning application. However, our highways consultant liaised with SCC extensively throughout the pre-application stage and the Transport Assessment Scoping was agreed. Indeed, the design of our proposed access and our submitted Transport Assessment & Traffic Analysis and Travel Plan reflected the input we received from SCC during that pre-application stage. Unfortunately, it appears that what was agreed in scoping was not acknowledged by SCC initially resulting in the consultation response received. However, since receiving the consultation response, we have continued to work with SCC and the progress to date is positive – indeed, SCC have themselves requested an extension of time to enable us to complete the necessary work and enable them to consider and comment.

In summary the County Highways department raised two concerns with the proposed development. The first centres around traffic data/modelling which inputs into the Transport Assessment (TA) and subsequent mitigation and the second is in relation to the proposed access to the site.

Regarding traffic modelling, we are confident this can be undertaken and submitted to you by 23rd March.

In terms of access, SCC now accept that the spacing of the two accesses does not constitute grounds for an objection and no further work is required to be undertaken in respect of this point.

I trust this demonstrates that these outstanding highways matters can be progressed to a positive outcome swiftly.

3/4. Scale of Growth and Landscape & Visual Impact

Whilst these are separate matters, they are somewhat interlinked.

In relation to the scale of growth at Templecombe itself, whilst I note your point with regards the views of the members of Area East Committee, as set out in the application submission, the settlement is considered sustainable taking into account local facilities including for example the school and forthcoming convenience store, railway station and significant employment generator and this has been recognised by the Council. As such, we do not consider the scale of growth proposed at Templecombe to be unreasonable. Indeed, no issues regarding capacity have been raised by statutory consultees that cannot be dealt with through contributions.

In relation to the scale of growth at the site itself the Council's own HELAA assessment initially suggested 78 units. This was revised to 35, due to 'conservation issues' however, we would suggest that this was without actually undertaking detailed heritage assessments. We have undertaken detailed assessments as part of the application submission and have now revised the layout to respond to Historic England comments so are able to demonstrate that a level of housing similar to the Council's own (original) HELAA assessment is achievable. Density wise this reflects that existing within other parts of the village and ensures the site is optimised.

In relation to landscape we acknowledged from the outset that this would need careful consideration in the design of any proposals. As such we sought early landscape advice and the scheme is landscape led taking into consideration both short and long-distance views of the site. The scheme has been sensitively designed and includes significant areas of open space incorporating tree planting and SUDS ponds allowing for a transition between the countryside and built up area. Final details would be secured at reserved matters stage and we are comfortable that landscape is not a reason to withhold development at the site, as reflected in the Council's own landscape study (albeit on a smaller part of the site).

Summary

Of the four concerns raised we believe those relating to highways and heritage having essentially been overcome. This leaves outstanding issues relating to the scale of growth and landscape / visual impact. These are subjective issues and we would look to discuss further with you during the extension to help alleviate any outstanding concerns you may have.

It is our intention to submit the additional highways modelling by Monday 23rd March and are therefore requesting an eight-week extension to determine the application, giving a revised target date of the 8th May. This should allow sufficient time for the additional information to be consulted upon and the application determined.

I look forward to hearing from you shortly regarding this request.

Yours Sincerely

J Manley

Joanna Manley
Associate