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Mr D Kenyon
South Somerset District Council
The Council Offices
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Sent by email to David.Kenyon@SouthSomerset.gov.uk and planning@southsomerset.gov.uk

18 April 2020

Dear Mr Kenyon,

Planning application reference; 19/03416/OUT Outline 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). Land at Manor Farm, Combe Hill, Templecombe Somerset.

Thank you for providing notification for the amended plans for the above application. I am pleased that the applicant appears to be making certain amendments to their proposals in response to the notices of objection raised by various parties, however I believe there are a number of fundamental arguments that remain unanswered, or unaddressed, which in my opinion must be resolved before the local authority deem any application on the above site suitable for planning consent.

In the content below, I make reference to my previous letter to you, dated 25 January 2020. For clarity, those references are shown in *italics*.

Highways

With regards to my previous objection relating to the visibility splays;

The visibility splays have been sized at 60m to suit an 85th percentile speed of 34.5mph for the A357 to the South of the proposed road entrance. The long sections of visibility splays on i-Transport drawing ITB14408-GA-030 show a visibility splay of this length passing just above the crest of the downward slope towards the traffic lights at the bottom of the hill. As quite rightly stated within this report, the current speed limit for this section of road is the national speed limit of 60mph. The applicant however does not provide any evidence of the speeds recorded on this section of highway to justify the proposed visibility splay of 60m.

It appears from the Highways Consultant response dated 7 April 2020, that they are happy with the proposed dimensions of the visibility splays to both the Northbound and Southbound carriageways of the A357 from the application site, as such have included this within their planning condition proposal to you.

As these visibility splays have been determined by the speed data (85th percentile wet weather) recorded between the 20th to 25th November 2018 (i-Transport Ref: MG/MS/PS/ITB14408-007A, 23 March 2020, Page 11), I trust that the highways department had sight of the recorded speed data in order to critique and base their agreement.

Can I request a formal acknowledgement and confirmation of this assumption please?

Regardless of any response to my assumption, this speed information being referred to in this planning application should be subject to the same level of public examination as all other aspects of the application, allowing diligent review of all the information contributing to the application and the local authority's determination of it. I therefore request that this information be presented for public examination, with the consultation period adjusted if necessary, to allow for review and comments to be made, as with all other planning related documents.

As a second item, regarding the potential to extend the 30mph limit zone;

The applicant does propose the possibility of extending the 30mph speed limit zone to the South. In fairness this would probably be a wise and welcomed change to the entrance of the village regardless of any proposed development. That said, a decision in favour of granting the vehicular access associated with this application on the speculation that the speed limit zone be extended South is unacceptable.

The merits of extending the 30mph zone to the South should only be used in the determination of this outline planning application once the traffic regulation order has been determined, adhering to all the required consultations. These consultations including the emergency services, the Freight Transport Association, the Road Haulage Association and such other organisations representing persons likely to be affected by any provision in the order.

To determine an outline planning application on assumption that the speed limit zone will be extended would be irresponsible, therefore if this is forming part of the proposed outline application, the determination should be deferred until the traffic regulation order has been completed and implemented.

Density

The amendments to the masterplan in response to the comments made by Historic England in respect to the proposal in the setting of the listed Manor House are noted, however the description of the planning application has not been altered to reflect the removal of dwellings to the rear of the listed building.

This could be mis-interpreted to suggest that numbers of dwellings have not been reduced at all, instead they are more likely to be relocated within the subsequently reduced buildable area, giving an even high dwelling density than originally proposed.

The current proposal of 80 dwellings on a development footprint of 2.44Ha calculates to give a dwelling density of over 32 dwellings per hectare. South Somerset HELAA 2018 suggests a reduced density for any development on this site due to conservation issues. To confirm, the HELAA suggests a yield of 35 dwellings for the entire site, less than half the proposed number.

Can the applicant please confirm the total number of proposed dwellings for this amended proposal and ensure these are clearly identified on the submitted masterplan, as there is some confusion about numbers shown on plan not matching that being applied for.

It is suggested in the applicant's letter for an extension of time, that the Council's HELAA number of 35 dwellings were based without undertaking detailed heritage assessments. If this were to be the case, it would be prudent for the Local Authority to undertake an independent detailed heritage assessment to determine the appropriate density of this site, rather than basing the decision on the applicant's assessment.

The following point raised in my previous letter still stands;

The proposed local plan for 2016 to 2036 suggests a suitable figure of 75 possible housing numbers to be provided within this 20-year period. Whilst it is perfectly understood this is only a guide rather than a target or ceiling, and it is respected that there is a demand for housing everywhere, members of the planning authority must take into account the cumulative effect of large-scale applications. This proposal alone could cater for the Local plan period of 20 years and that is on top of other large applications of 49 dwellings on West Street (19/01604/OUT), 19 dwellings on Throop Lane (18/00650/OUT), 70 dwellings at Slades Hill (18/02739/OUT).

Whilst the applicant's various correspondence have suggested that the density of the proposed reflects that of other parts of Templecombe, it is the duty of the Local Authority to account for the cumulative impact of this and other applications and consents within this rural settlement.

Finally, I refer to my closing remarks of my first letter to you. The first being the reasons for refusal for two previous applications on this site;

I therefore refer to the notifications of refusal of two historic planning applications on this site, 06/02405/OUT & 07/01308/OUT which state;

"The proposal would appear as an incursion of built form into the open countryside, to the detriment of the character and setting of Templecombe"

This raises the question why the determination of this latest application should be any different.

And secondly, my suggestion for any new development to restrict the development footprint to the immediate vicinity of the existing built form to be demolished would be a far more appropriate and acceptable solution.

Yours Sincerely

T Shepperd
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