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FAO: Mr Colin Begeman - Case officer

Ref: Outline planning application 20/03160/OUT

21st January 2021

Dear Mr Begeman,

I write in response to the Boon Brown "*Addendum to planning statement following the councils publication of their latest 5 year land supply document*" dated 15/12/2020. I think it makes several misleading statements.

Need and sustainability

Boon Brown have made no attempt to demonstrate actual need in Lopen in their application, but in this new document they appear to attempt to demonstrate over-arching general need in rural settlements. I do not understand the thrust of the argument around the figure of 2,242 dwellings. This is the number of new dwellings the SSDC adopted plan 2006 - 2028 allocated for rural settlements, which was exceeded some time ago.

In November 2020 SSDC produced a specific **Guidance Note for Applicants - Policy SS2: Rural Settlements – Residential Development**, which is very relevant to this application:

In particular:

"Following the publication of the Five-Year Housing Land Supply 2020-2025, November 2020 and the conclusion that SSDC can demonstrate a housing land supply equivalent to 6 years, it is considered that full weight can again be attributed to Policy SS2." (my underline)

and

"Policy SS5: Delivering Housing Growth

Policy SS5 identifies a target of 2,242 dwellings in Rural settlements between 2006-2028, this target has already been exceeded." (my underline)

As you can see that this clearly states that this target for rural settlements has already been exceeded, with 8 years still to run, so even viewing it as minimum, there should be no great pressure to push housing into marginal locations.

The SSDC document then goes on to re-iterate and explain the S62 policy requirements, which further serves to demonstrate that this application meets few, if any of them, especially when the actual distances and geography of allegedly "easily available amenities" are properly examined. I note this point is raised repeatedly in objections from villagers, who are well placed to know the reality!

Boon Brown then refer to the local plan review (draft) as identifying need and stating "*for new housing in rural settlements and proposes that these qualifying rural settlements 11% of all future growth for the district*". (my underline)

What is not pointed out is that when doing this review SSDC produced a document, dated November 2018, entitled "The Potential for Rural Settlements to be Designated 'Villages'". This document seems to be where this 11% figure comes from and where the criteria for "qualification" are examined. The thrust of this document is that the relative lack of success of hitting overall housing targets in the SSDC region is caused by a shortfall in numbers being brought forward (not necessarily a lack of permissions granted) in the major centres. Meanwhile, numbers in smaller settlements have exceeded targets, so it explores the possibility of boosting the overall numbers by increasing development in smaller settlements.

However, they are alert to the risks of overdevelopment in unsuitable locations and their document outlines the rigorous process used to assess the suitability of villages, currently designated as rural settlements, for further development in terms of scale, amenities, transport links and so on. The document is 59 pages long, but the key points for this matter are (actual quotes in italics):

- *"It is intuitive to think that the largest of the Rural Settlements, with the highest existing populations and numbers of existing dwellings, would be most able to 'absorb' additional growth without their scale and character being fundamentally altered."*
- *"Existing levels of retail and community facilities help in defining whether a settlement already acts as a local service centre. It is obvious that those settlements with the higher level of service provision could be considered the most appropriate for growth."*
- No settlement with a population under 900 (as of 2011) was considered.
- *"In order to ensure that development should be permitted in only the most sustainable locations, it is also proposed to require at least four of this revised list of facilities to be present in a settlement if new housing is to be provided."* (My underline, Policy SS2 only required 2).
- None of the 32 villages considered worth examining in detail were Lopen.

Therefore I think it is safe to say that very small rural settlements with minimal amenities, such as Lopen, were not what SSDC had in mind for the 11% figure!

Also, when Boon Brown bemoan the low levels of development in Lopen (one just built, one in-build and two further permissions existing), I suggest that far from being low, these are actually quite high, considering the small size of Lopen and the fact that under the properly applied terms of SS2, it shouldn't be having any at all without proven need. It should be noted that all four are amendments to or replacements for existing structures and not green field sites.

Employment potential

The Boon Brown letter also makes this statement:

"but importantly it has a considerable employment provision for a community of its size offering an unusual degree of self-containment. This level of employment provision provides opportunities to live and work within the same village."

It is true that Lopen parish has a disproportionate amount of industrial development for its size and location. Mill Lane is to the south and partly in Merriott parish, though all access is via Lopen. This is a long standing industrial area based around an old mill, which has grown incrementally over the years by fair means and foul, in spite of its flood risks and very poor access. It has a reasonably diverse range of small industries, but I'm only aware of one Lopen village resident actually working there.

The Lopen Head industrial area to the north is a much more recent addition and something of a planning oddity, owing more to land ownership and influence than proper development principles. Originally it was "sold" to the village on the promise that it would provide small-scale starter units for local business, built on the site of a redundant plant nursery. In fact it has spread to neighbouring green field site and morphed into a series of giant hilltop boxes owned by just two companies, one of them a large multi-national. Thus

it offers no home for small local business at all and I am not aware of anyone living in Lopen being employed on that site.

So, a score of just one employed from the village across the two sites doesn't support the claim of self containment. Further, neither location convenient realistic, safe pedestrian links to the village.

The Mill Lane estate, though just 500m from the application site, would require a pedestrian to walk on the carriageway of the former A356 for 90m with the remaining 400m on a single track lane closely enclosed by thorn hedges and frequently used by full-sized HGVs accessing the estate.

The Lopen Head site is 1.5 km from the application site, and once again, local geography dictates that (as with the farm shop, cafe and takeaway trumpeted as easily accessible amenities!) pedestrians have the choice of:

- taking public footpaths, with stiles, gates, nettles, steep slopes, brambles and mud,
- or walk up the carriageway of the busy former A356 with its blind bends between steep banks - thoroughly pedestrian-hostile!

Then there is the question of how many of those employed at either estate might be able to afford a detached 3 or 4 bedroom house in a "sought-after village location"? Not many, one suspects.

Phosphates and Ramsars on the Somerset levels.

Boon Brown had this to say about the Ramsars phosphates situation in Somerset

"This will inevitably have a considerable impact on the delivery of new homes for the coming years therefore it is vitally important that alternative sites, such as this, are considered to help support the future land supply and sufficient provision of new homes."

I am unclear how this could be considered an "alternative" site when it sits within 200m of Lopen Brook, which is a tributary of the Parrett, which flows right through the affected areas? I'd think this site would be affected too and be subject to the same controlling criteria.

In summary, I consider that the application fails to demonstrate any local need, benefit or desire for the proposed housing. It fails to make a valid sustainability case in even while misrepresenting the local geographical realities. It fails to show any good reasons why SSDC should fail to give full weight to their adopted policies.

I'd be grateful if the above points can be taken into account when considering this application.

Yours sincerely



Nick Jones