

Our Ref: 12-020

Mr Adrian Noon
Development Management
Council Offices
Brympton Way
Yeovil
Somerset
BA20 2HT

7th January 2014

Dear Mr Noon

**Re: Land at Goldwell Farm, Yeovil Road, Crewkerne (Application Ref: 13/02941/OUT)
Representation on behalf of Taylor Wimpey Homes**

This letter of representation is submitted in relation to the above planning application for 110 dwellings and associated uses at Goldwell Farm, Crewkerne on behalf of Taylor Wimpey Homes. Taylor Wimpey has significant land interests at Crewkerne and is the developer of the Crewkerne Key Site directly to the south of the Goldwell Farm application site.

The Crewkerne Key Site is allocated for development within the adopted South Somerset Local Plan (Policy KS/CREW/1) and also within the emerging Local Plan (Policy HG1). Outline planning permission for 525 dwellings was granted in January 2013 and Reserved Matters approval for the first phase comprising 200 houses approved in September 2013. Commencement of the site is expected in 2014. The development provides a significant amount of the housing provision for the town over the course of the next 20 year plan period.

This letter raises objection to the principle of the Goldwell Farm application having regard to the existing and emerging development strategy for the town and also raises concern with a number of detailed items with the proposal which collectively lead to Origin3 concluding that the application should be refused planning permission.

Principle of Development

The application site lies outside of the Crewkerne Settlement Boundary as designated in the adopted South Somerset Local Plan (2006). Policy ST3 clearly states that outside of defined development areas of towns, development will be strictly controlled and restricted to that which benefits economic activity, maintains or enhances the environment and does not foster growth in the need to travel. The Goldwell Farm application does not achieve these policy requirements and on this basis it represents development in the open countryside and a departure from the Development Plan. Therefore an in-principle policy objection exists.

Emerging South Somerset Local Plan and Prematurity

The emerging Local Plan for South Somerset covering the period 2006 – 2028 is at an advanced stage. The Plan was subject of public examination by an independent Planning Inspector in May-June 2013. The Local Planning Authority has since updated its evidence base in response to initial concerns raised by

the Inspector on issues which went to the heart of the soundness of the Plan. None of these 'soundness issues' related to Crewkerne and therefore it can be assumed the development strategy within the Plan for this settlement, which directs growth to the east and south-east of the town and not Goldwell Farm, is acceptable. The Plan is due to be re-examined in spring 2014 with adoption anticipated before summer 2014.

The Development Strategy for Crewkerne set out within the Submitted Local Plan outlines the significance of the Key Site to deliver the growth for the town over the plan period. The direction of the growth to the east and south-east of Crewkerne is established (Policy HG1). Of the 961 dwellings proposed over the plan period, 916 are already committed setting a residual requirement of 45 dwellings. Whilst Origin3 consider the housing provision for Crewkerne should be increased through the re-examination process, it concurs with the Plan that the residual amount of dwellings should be considered through the future Site Allocations and Development Management DPD process.

Approval of the Goldwell Farm application to the north of the town and north of the A30 is inconsistent with the emerging development strategy for Crewkerne set out within the emerging Local Plan which has been through a robust plan making and Sustainability Appraisal process. It is therefore premature when considered against the emerging development strategy which is due re-examined and adopted in the coming months.

Housing Land Supply

Recent appeal decisions indicate South Somerset District's five year housing land supply position is marginal. As such the Applicant has indicated that the presumption in favour of sustainable development set out in the NPPF (para 14) should apply and that relevant policies for the supply of housing should not be considered up-to-date in this respect (para 49).

Using the Applicant's planning approach, the proposal would still need to achieve sustainable development against the provisions of the NPPF. Origin3 conclude that this proposal would not represent sustainable development on the grounds that the adverse impacts of approving this development significantly and demonstrably outweigh the benefits when assessed against the policies of the NPPF on the following grounds:

- It is inconsistent with the planning making process whereby the South Somerset District Council has produced a clear development strategy for Crewkerne through a plan making process including Sustainability Appraisal which has guided development south of the A30 and east of Crewkerne; and not to the north of the town.
- Design, technical and deliverability concerns exist, particularly in relation to highways, which should carry significant weight in the decision making process and determining the sustainability of the site. These are expanded upon below.

It should also be noted that the emerging Local Plan sets out a strategy for achieving a five year housing land supply for the District. This strategy can be expected to be approved by an independent Planning Inspector in spring 2014 and therefore a strategy for meeting the need for development in the District in the next five years will be confirmed.

Access

Detailed approval of the proposed access from the A30 has been applied for within the Goldwell Farm application. The access shown on i-transport drawing ITB7206/GA/006B is on land outside of the redline application boundary and extends beyond the limit of the existing public highway on to land in the

ownership of Taylor Wimpey. The access proposal submitted is therefore reliant on land in the ownership of Taylor Wimpey and delivery of the approved Crewkerne Link Road (CLR).

The application fails to demonstrate how access could be delivered independently of the CLR A30 signal junction (using a three-arm-signalised junction) and how it can be provided without prejudice to the delivery of the CLR A30 junction by Taylor Wimpey. The submitted design and access statement does not refer to an alternative independent three-arm access and therefore the Applicant are not able to deliver the access without the A30 CLR junction in place.

The access proposals would require collaboration between the Applicant and Taylor Wimpey. Taylor Wimpey has not been approached by Gleeson to discuss delivery or funding of the four-arm signalised access junction.

The Transport Assessment and Design and Access Statement place significant emphasis on future vehicle, pedestrian and cycle links provided by the CLR to the new facilities within Taylor Wimpey's Key Site (Primary School, Local Centre etc) and to the south of Crewkerne including Blacknell Lane industrial area and train station. The provision of these links is dependent upon the delivery of the completed CLR by Taylor Wimpey. Given that they are strategic infrastructure links for the land to the north of the A30 then, to ensure timely delivery required to assist the sustainability of the Goldwell Farm site, they should be partly funded by Gleeson.

Upon the advice of Taylor Wimpey's highways consultants, Phoenix Design, there are also technical design reasons why the access is not deliverable in its current form. These are set out in a separate enclosed Highways Response, however in summary:

- The A30 access westbound non-hooking right turn arrangement is not safe;
- The arrangement has a high risk of 'rear end shunts' for vehicles turning right from the A30 into the site and is therefore not safe;
- The access arrangement shows two tight radius bends on a downhill slope with 25m forward visibility (based on Manual for Streets and 20mph speed), and bordered by 1.2m retaining walls with 1:2 embankment. Drivers will be unsighted on the approach to the traffic signals. The combination of the tight radii, steep gradient and poor visibility on the approach to the traffic signals is unsafe.
- Cycle links from the CLR site will be provided north to the Ashlands Road junction. The CLR A30 signalised junction does not include any cycle facilities except advanced stop lines. To provide a good quality safe cycle and pedestrian link from the Gleeson site to the Local Centre and Primary School within the CLR site, and to facilities to the south of Crewkerne (Station & Bracknell Lane), the junction would benefit from the inclusion of cycleways and a toucan crossing. The current layout does not allow for this;
- The northern arm of the access to the Gleeson site does not include any pedestrian facilities for pedestrians walking along the footway on the northern side of the A30 Yeovil Road.

It is concluded that a safe access from the A30 for vehicles, pedestrians and cyclists cannot be delivered without modification to the current proposals, without use of land under Taylor Wimpey's control and without additional costs. Any revised junction would need to be remodelled to ensure that the amended junction has adequate capacity.

Highways

A strategic requirement of the Crewkerne Key Site application was the timely delivery of the link road taking existing and new traffic from the A30 to the A356, avoiding the need for additional movements through the town centre. Following relevant highways modelling and assessment of the local transport network, Taylor Wimpey was required to complete the full link road by the 200th dwelling or within 4 years from first occupation in order for the development to be found acceptable by Somerset County Highways.

Clearly, the Goldwell Farm application introduces significant new vehicle movements to the north of the A30 and places additional pressure on the town centre routes. When combined with the 200 dwellings at Crewkerne Key Site, this now equates to 310 dwellings being delivered before the full CLR is completed.

The Applicants Transport Assessment concludes that the existing highways network can accommodate 310 dwellings without the CLR being completed. Whilst Taylor Wimpey has not undertaken its own transport modelling exercise at this stage, this conclusion represents a significant movement from what has been historically approved and encouraged by Somerset County Highways. It also raises doubt about the validity and robustness of Somerset County Highways existing requirements for the Crewkerne Key Site and the CLR delivery timescales.

Comprehensive Development

Our client is also disappointed that the Applicant for Goldwell Farm has not sought to actively engage with Taylor Wimpey Homes both during the pre-application process or once the application has been submitted. This is particularly disappointing given the sites are adjoining and considering the Goldwell Farm application seeks to modify the approved access to the Key Site. This is poor planning practice and at odds with guidance within the NPPF which seeks to deliver comprehensive development through stating that Applicants will be expected to work closely with those directly affected by their proposals and that this should be demonstrated in developing the design of new development (para 66).

Unresolved Consultation Responses

Finally, it is drawn to the Council's attention that there appear to be unresolved objections from the Town Council, Somerset County Travel Plan Officers and Somerset District Council Landscape Officer which if left unaddressed should be afforded weight in the decision making process.

Summary

The development represents a departure from the Development Plan and the emerging development strategy for Crewkerne set out within the Submitted Core Strategy which is due to be re-examined in early 2014. For this reason, the proposed development is not policy compliant and is also premature pending the forthcoming re-examination of the emerging Local Plan. In sustainability terms there are technical and deliverability issues which weigh against the development in the planning balance and override the benefits. On this basis, Origin3 conclude that the application is refused.

Yours sincerely,

Jonathan Orton
Director
(jonathan@origin3.co.uk/ 0117 927 3281)

HIGHWAY & TRANSPORT REVIEW

Documents Reviewed:

- Application Boundary: Floyd Matcham Drawing TD639/03
- A30 Access Plan: i-transport Drawing ITB7206/SK/006A
- Transport Assessment: i-transport
- Design & Access Statement: Floyd Matcham
- Planning Statement: Sellwood Planning

Highway & Transport Comments:

- Outline planning application is sought for: *residential development up to 110 dwellings, plus associated open space (including allotments and areas of habitat enhancement), foul and surface water infrastructure, internal footpaths, cycle routes and estate road, and an access on to the A30.*
- The only matter not reserved for future approval is the A30 access as shown on i-transport's drawing ITB7206/SK/006A (copy appended).
- The access shown on i-transport drawing ITB7206/SK/006A is on land outside of the redline application boundary, as shown on Floyd Matcham drawing TD639/03 (copy appended), and extends beyond the limit of the existing public highway on to land in the Ownership of Taylor Wimpey.
- The access proposal submitted is reliant on land in the ownership of Taylor Wimpey and delivery of the CLR A30 signalised junction by Taylor Wimpey.
- Contrary to Section 6.3.5 of i-transport's Transport Assessment the application fails to demonstrate how access could be delivered independently of the CLR A30 signal junction (using a three-arm signalised junction) and how it can be provided without prejudice to the delivery of the CLR A30 junction by Taylor Wimpey.
- The access proposals submitted would require collaboration between Gleeson Strategic Land and Taylor Wimpey. Taylor Wimpey has not been approached by Gleeson to discuss delivery or funding of the four-arm signalised access.
- The access proposals shown on i-transport drawing ITB7206/SK/006A are not considered to be safe, in particular the westbound non-hooking right turn arrangement. The arrangement shown is considered to have a high risk of 'rear end shunts' for vehicles turning right from the A30 in to the Gleeson's site. In our view a separate right turn lane should be provided; this would impact significantly on the layout of the junction and would need to be remodelled to ensure that the amended junction has adequate capacity.

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- The access arrangement from the land to the north of the A30 shows two tight radius bends (centre line radii of 20m), on a downhill slope varying between 4-6% (1:25 and 1:16.67), with 25m forward visibility (based on Manual for Streets and 20mph speed), and bordered by 1.2m retaining walls with 1:2 embankment. Drivers will be unsighted on the approach to the traffic signals; the combination of the tight radii, steep gradient and poor visibility on the approach to the traffic signals is considered to be unsafe.
- The Floyd Matcham Design and Access Statement refers to a 4-arm signal junction as the means of access to the land to the north of the A30; no reference is made to an alternative independent three-arm access. Gleeson are not able to deliver this access without delivery of the A30 CLR junction and collaboration from Taylor Wimpey.
- The TA and DAS place significant emphasis on the future vehicle, pedestrian and cycle links provided by the CLR to the new facilities within the CLR site (Primary School, Local Centre, etc and to the south of Crewkerne, including the Blacknell Lane industrial area and the Railway Station. The provision of these links is dependent on delivery of the completed CLR by Taylor Wimpey. If they are important strategic links for the land to the north of the A30 then, to ensure timely delivery, they should be partly funded by Gleeson.
- Cycle links from the CLR site will be provided north to the Ashlands Road junction. The CLR A30 signalised junction does not include any cycle facilities except advanced stop lines. To provide a good quality safe cycle and pedestrian link from the Gleeson site to the Local Centre and Primary School within the CLR site, and to facilities to the south of Crewkerne (Station & Bracknell Lane), the junction would benefit from the inclusion of cycleways and a toucan crossing. The current layout does not allow for this; to include provision would require significant amendments that would result in the loss of development land and additional costs to Taylor Wimpey.
- The northern arm of the access to the Gleeson site does not include any pedestrian facilities for pedestrians walking along the footway on the northern side of the A30 Yeovil Road.
- Taylor Wimpey does not believe that a safe access for vehicles, pedestrians and cyclists can be delivered without modification to their proposals, without loss of development land and without additional costs.

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- The suggested highway contributions identified in the i-transport TA are limited to:
 - Public Transport Improvements;
 - Walking & Cycling improvements between the site and the town centre from the north; and
 - Travel Plan measures.

- The S106 Heads of Terms identified in the Planning Statement produced by Sellwood Planning suggests the following provisions or contributions:
 - a contribution to off-site education facilities;
 - a contribution towards off-site playing fields;
 - a contribution towards off-site leisure provision;
 - off-site bus and cycle enhancements;
 - green travel vouchers;
 - smart travel information pack;
 - town centre improvements;
 - travel plan co-ordination; and
 - on-site affordable housing.

- The transport and highway contributions suggested do not include any contribution towards the delivery of the A30 Yeovil Road signalised access or the CLR from the A30 to the A356 Station Road on which the development of the land to the north of the A30 is reliant.

- The traffic modelling in the TA assumes that the CLR development in its entirety will be complete by 2018. This is unlikely and is considered to be a conservative assessment.

- At this time we have no reason to dispute the traffic flows or junction modelling included in the TA. The modelling shows that the development of the land to the north of the A30 will not have any significant impact on the capacity of the A30 CLR signalised junction (as shown on i-transport's drawing ITB7206/SK/0006A), or the Ashlands Road/A30 junction (current priority arrangement or future signalisation by SCC).

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Conclusion:

- The TA produced by i-transport concluded that it “demonstrates how safe and suitable access will be achieved” and that the land to the north of the A30 is “acceptable in transport terms and would not have a noticeable residual transport or highways impact”.
- We would strongly disagree with these conclusions on the basis that the proposed A30 access cannot be delivered by Gleeson in the form shown on drawing ITB7206/SK/0006A and that it has not been adequately demonstrated that an alternative independent three-arm signalised arrangement would not prejudice the delivery of the A30 CLR signalised junction.
- We have major concerns about the safety of the access arrangement proposed and do not believe safe access to the land to the north of the A30 can be achieved without modifications to the Taylor Wimpey CLR A30 access, resulting in loss of development land and additional costs.
- The A30 CLR junction would require significant modifications to provide a good quality safe cycle link to the land to the North of the A30. This would result in loss of land and additional cost to Taylor Wimpey.
- The development of the land to the north of the A30 is reliant on and benefits significantly from the CLR site. It would therefore seem reasonable for the development to contribute to the major highway and transport infrastructure being provided by the CLR development, assuming access arrangements can be resolved.