

Appendix

Broadway Parish Council

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PLANNING APPLICATION FOR HOUSING DEVELOPMENT ON LAND AT POUND FARM, BROADWAY: 18/01311.

RESPONSE BY BROADWAY PARISH COUNCIL

Broadway Parish Council considered application 18/01311 at a specially convened public meeting of the Council on 19 June attended by 33 residents and the developer's representatives, it has met the developer to hear about the changes made from the application for this site withdrawn in 2017 and councillors attended the applicant's exhibition at the Village Hall. The Council notes that the number of buildings proposed for the site has been reduced from 46 to 35, that a greater mix of dwellings has been included, that some open space would be created, traffic calming measures are proposed for Pound Road on its approach to the Broadway Road/Hare Lane crossroads and that a pathway is intended to be constructed for 210m towards the centre of the village from the proposed site. Despite these alterations from, and additions to, the previous application, the Council remains opposed to the development and accordingly objects to the application.

From the outset there has been significant opposition in Broadway to the development of the land which is the subject of this application. This was reflected in the Council's letter of 14 December 2017 objecting to the first planning application for this site. In its view, the arguments which the Parish Council adduced on that occasion are still valid.

The Parish Council's grounds for objecting to this application are as follows and are summarised at the conclusion.

The integrity of the village.

One of the Parish Council's key concerns is the impact the proposed development would have on the character and integrity of the village.

For centuries, Broadway was a small settlement of vernacular cottages and farms, often thatched, which was typical of the many villages which gave South Somerset its attractive and

historic character. Despite the addition of some local authority housing and minor in-fill, that remained the case until the 1960s. From that time onwards, new housing developments at Stoford Place off Suggs Lane (15 houses), Lamparts Way (15), Carlan Stepps (6), Tanyard (13) and St. James' Gate (16) off Broadway Road and Brookside (18) and Standerwick Orchard off Goose Lane (38) significantly increased the number of dwellings and, by their modern appearance, changed the character of the village. Although, at the eastern end of the village, development ended at the Village Hall, at the western end linear in-fill continued to extend the built-up area along Broadway Road towards the proposed development site, although much of this modern in-fill was separate from the older, traditional housing between Paulls Lane and Goose Lane.

At paragraph 2.7, the applicant's Planning Statement summarises this incremental process of development and enlargement thus:

Development in Broadway is largely linear in form, with housing fronting Broadway Road, Goose Lane and Hare Lane. Since the last half of the twentieth century up to the present day, there have been a number of small scale housing developments built to the south and north of Broadway Road.

This misrepresents the situation.

First, development in Broadway has seen a visible contrast between linear development on the northern side of the village, with only one cluster of 5 new houses built on a brown field site in Olivers Lane, hidden behind housing fronting Broadway Road, and a mix of predominantly clustered developments on the southern side. All of the developments since the 1970s mentioned earlier are on the south side. Thus the historic practice has been to in-fill lineally on the north and create housing clusters to the south, each accessed by its own roadway onto Broadway Road, Suggs Lane or Goose Lane. It is for this reason that the applicant's Land Appraisal Report states at paragraph 3.2 that the built environment on the northern side of the village extends back only 100m, while on the south it extends to twice that distance. A similar process of linear development continues in Hare Lane westwards from its junction with Pound Road and Broadway Road.

Thus, contrary to the assertion in paragraph 8.10 of the applicant's Planning Statement that the "proposed number of units would be commensurate to the scale and character of Broadway," the proposed Pound Farm development would not only be the second largest housing cluster built anywhere in the village, it would also be by far the largest housing development on the northern side of the village. It would also extend back north from Broadway Road further than the rest of the built environment on that side, with the exception of the 5 houses hidden away in Olivers Lane. Moreover, it would be entirely out of alignment and scale with all the bungalows and modern houses adjacent to it for over 300m east along Broadway Road towards the village centre.

Second, the applicant's Planning Statement refers at paragraph 2.7 to 'a number of small scale housing developments'. In the context of the national planning scene, 'small' is a relative term. In the context of a village the size of Broadway, which in 2011 had only 328 dwellings, some of the developments already built are large. One recent example stands out, that of Standerwick Orchard in Goose Lane. Approved in 1995, this added 38 dwellings to the village housing stock, or over 15% more at a stroke.

Developments such as this have seen the housing stock in the village increase significantly. The 1991 Census has Broadway with 232 dwellings. By 2001 this had increased by 33 to 265. By 2011, however, the rate of expansion had almost doubled, with 63 new houses, bringing the total to 328, a 41% increase over 20 years, but 23% over just 10. Ignoring the occasional single new house in the village, the recently built development at St. James' Gate and those approved on appeal at Varden's Field and the Bell Field, when completed, will bring the total up to 378. Finally, adding the 35 houses at Pound Farm would see Broadway expand to 413 houses, or a 50% increase since the beginning of the millennium.

While the Parish Council believes that there is advantage in providing an increase in housing in the village if it reflects local need, is modest in scale and sympathetic in design, it considers that these figures demonstrate that there has been too much modern housing development in Broadway in recent years, the Council having opposed the last 2 applications for this reason. It believes that the village is being swamped in a way which, by virtue of the scale and modernity of recently completed and approved developments, is robbing it of its character as a modest, historic and attractive south Somerset village. In the Council's view, it is time to halt the spread of relatively large-scale, modern housing developments in the village, but without preventing the construction of individual houses or small groups of houses built sympathetically. This view reflects opinion in the village. Responses to the Parish Council's June 2016 Housing Survey showed local support for housing developments of 10 houses or less, but no support at all for developments on a larger scale.

Relevance of District's housing 5 year plan

Section 6 the applicant's Planning Statement refers to South Somerset District Council's lack of a 5-year supply of deliverable housing land. It further states that the Government's National Planning Policy Framework's paragraph 49 means that, as a consequence, the District Council's policies for the supply of land should not be considered up to date.

The Parish Council endorses the District Council's approach to the supply of housing land, which is to focus development on the larger settlements and to ensure that development in village communities is restricted to those where sustainability can be clearly demonstrated and which do not overwhelm the character of the village. Any other interpretation of the District Council's approach and to the guidance in the Framework is, effectively, to give developers *carte blanche* to build outside the main centres, notwithstanding the District Council's adopted policy and the extent to which any particular village may already have contributed to the increase in the housing stock.

The applicant's Planning Statement reinforces this concern by its reference in paragraph 8.3 to the current gap in the supply of housing land and the estimated demand for housing. By claiming that the Pound Farm development would "*provide a valuable contribution to the districts housing supply and help to reverse this negative trend*" in the widening gap between demand and supply, the applicant ignores the extent to which Broadway has already contributed to meeting the district's demand for housing and will be contributing further via recently approved developments.

The applicant's Planning Statement refers (paragraph 7.3) to the District Council's own calculation that there will be a shortfall of 932 houses in its area over the 5-year planning period. The 35 units proposed at Pound Farm represent 3.7% of South Somerset's projected

housing completions deficit. That is a wholly disproportionate contribution for a village with less than 0.5% of the District's population or 0.5% of the District's housing stock (figures from the 2011 census). But if approved housing developments for the village are added to the figure for the Pound Farm development, Broadway's future contribution to bridging the deficit rises to 7.5%, entirely out of scale with the village's size.

The Parish Council is also concerned that justifying a large housing development in Broadway because it helps to bridge an otherwise increasing District-wide housing completions deficit, leaves the village open to similar over-large developments in the future. Given the extent of the existing and approved housing developments in the village, the Parish Council believes that Broadway has made much more than its fair contribution to meeting the demand for housing in the district, but at the cost of over-development. For this reason, the Parish Council believes that the Pound Farm development would represent in Broadway a disproportionate contribution to District housing needs and would be out of scale with the size of the village.

Housing Need

Two significant advantages of the proposed development cited in paragraph 4.1 of the applicant's Planning Statement are the provision of 5 bungalows and 9 affordable housing units.

So far as the bungalows are concerned, the Parish Council's June 2016 Housing Survey did reveal support for the provision of single-storey dwellings, in part to facilitate down-sizing by older residents from larger two-storey dwellings, thus freeing up the wider housing market. However, it is emphatically not the case that the applicant has introduced bungalows into the proposed development at the request to the Parish Council, which has made no formal suggestions as to features it would like to see included. It should also be noted that a significant proportion of the housing stock built in the village since the 1960s has included bungalows, whether as part of major schemes or as in-fill.

The Parish Council's June 2016 Housing Survey also revealed support in the village for the provision of affordable housing. However, this was at a relatively modest level, with only 8 respondents (out of 134) indicating a desire for affordable housing in the next 5 years. Since then, 6 units of affordable housing have been provided at St. James Gate. It is expected that around a further 7 or 8 will be provided at the housing development approved on appeal to the rear of the Bell Inn. The Parish Council believes that the provision of affordable housing is to be welcomed if it satisfies local demand and thereby enables families to remain in their communities. Given the affordable housing recently provided and planned for in approved developments, the Parish Council does not consider that its provision at Pound Farm is a compelling reason for permitting the development proposed there.

Sustainability and social benefits

Paragraph 8.8 of the applicant's Planning Statement claims that Broadway is a sustainable location for the proposed development because it has 4 of the services required to meet the sustainability standard. It also prays in aid the Inspector's view of this issue in his report on the Bell Field housing development appeal report. The 4 key services referred to are a primary school, doctor's surgery, village hall and public house.

It should be noted that all 4 key services are at the opposite end of Broadway from the proposed Pound Farm development. The School is 1 km away and the village hall and medical centre are 1.3 km away. While residents of Hare Lane and upper Broadway Road use these facilities, the addition of 35 families in one development can only increase traffic along Broadway Road and, so far as pedestrians are concerned, increase road safety risks. Both of these factors further argue against the sustainability of Broadway as a location for the proposed development.

It should be noted that there is no longer a scheduled or request bus service through Broadway. Residents' shopping is therefore done largely in Ilminster and Taunton by car, with the shop and Post Office on Goose Lane in Horton providing a much-valued but modest convenience outlet. The heavy reliance on cars for personal transport undermines the sustainability of the village and immediate local area, particularly as a location for relatively large housing developments.

Finally, the applicant's Planning Statement confirms that it is intended to make an area of open space available to the village in the development. This would be available because of the reduction in the number of houses intended for the site and the consequent release of land to the north of the built area. An increase in public open space is to be welcomed, but in this case is likely to have very limited value. The proposed site is at the far end of the village and thus far less accessible to residents than the village's own playing field next to Neroche Primary School. Moreover, in June 2018 the Parish Council started a consultation on the redevelopment of the playing field, which will make it a much more attractive facility for local children of all age groups up to age 16. While the proposed public open space at the Pound Farm site would no doubt be enjoyed by residents of the development, it is most unlikely to appeal to any but a small number of current villagers, even those living close by, who have ample access to the countryside via the network of nearby footpaths.

Inappropriateness of the site

The Pound Farm site is at the edge of Broadway before Pound Road cuts across Broadway Road and Hare Lane, the latter with its string of linear developments westward. Thus, from west of Olivers Lane in the village, to the end of housing/farms in Hare Lane, a distance of 1 km, there is no cluster development. All the properties access straight onto the highway. The proposed development at Pound Farm would be an incongruous exception to this pattern of housing, by being a rectangular block of modern houses, unrelated in scale or positioning to any of the houses in either direction. This is accentuated by virtue of the fact that the 6 dwellings immediately to the east of the proposed site are all bungalows, representing a significant contrast to the 2-storey buildings which would be visible from the entrance to the site.

Nor does the Parish Council accept the statement at paragraph 8.11 of the applicant's Planning Statement that *"the site is inconspicuous in both the wider and local landscape"* As paragraph 7.30 of the Landscape Appraisal Report makes clear:

"A new access to the development will require an opening in the hedgerow on Broadway Road about 30m long that will give a view of the four new housing buildings located adjoining the entrance to the site. The roofs of the buildings further back will also be glimpsed from this viewpoint."

The report also says (paragraph 7.31):

“The view of the development through the new road access on Broadway Road and the indistinct views through the hedgerows during the late winter and early spring months will change the character of Broadway Road over the 120m long frontage to the site. This change will be noticeable to road users.”

The Parish Council agrees that it will be impossible to hide the proposed development from road users, but believes that the impact of 35, mainly 2-storey houses on the site will be much more visible to passers-by, particularly in the winter months. As already indicated, the contrast with the nearby bungalows will be very evident. Furthermore, the District Council’s September 2017 5-year Housing Land Supply Paper describes the site as ‘visually prominent’.

The Parish Council believes that the development will in fact be an incongruous and visible addition to the landscape.

Design

Page 23 of the applicant’s Design and Access Statement sets out the ambition for the appearance of the development. In particular it says:

“Integrating the site into the surrounding area and establishing character is vital in delivering a successful scheme. This includes locally distinctive development patterns, landscape, culture, materials and biodiversity.”

To achieve this, the Statement continues:

“The development will adopt a style and character which draws on and interprets the key elements of the surrounding area of Broadway.....The scale and massing of the development will respond to the immediate built environment. The development will contribute to positive change to the image of Broadway and Horton through the design of a high quality housing development.”

These are laudable aims, but ones which the Parish Council believes are unachievable at the Pound Farm site. As already explained, the attempt to ensure that the scale and massing of the development responds to the immediate built environment will be undermined by the proximity of a line of bungalows. The screening of the development, but particularly its remoteness from the older parts of the village, will make successful integration into the visual character of the village impossible. This contrasts with the Standerwick Orchard development referred to on page 36 of the Planning Statement. Here, the use of materials including brick, stone and thatch derive from a Design Brief drawn up by the District Council in 1997 to reflect those features in adjacent traditional buildings. But at Pound Farm there would be no similar traditional reference points for the development to reflect and respond to. The result here would be the creation of a clearly modern development aping local character in an unconvincing and superficial manner. Nor is it apparent to the Parish Council how such an approach can do other than create an anomalous and isolated mass of housing, drawing attention to itself by virtue of its stylistic incongruity.

Road Safety

Page 30 of the applicant's Design and Access Statement indicates that it is proposed to create a pathway on the southern side of Broadway Road for 210m eastwards from the entrance to the proposed development, which the developer claims will be "providing a link to the main body of Broadway village". However, the proposed pathway does not link to the main body of the village. The Pound Farm site is 500m from the village centre at Goose Lane, where the pavements to the school and village hall/medical centre start. Any improvement to pedestrian safety along Broadway Road is to be welcomed, but the section of road along which the pathway is intended to run has clear sight lines and a grass verge, which is not the case for the remaining distance to Goose Lane. Its contribution to improving road safety is thus likely to be less than the applicant argues.

While the applicant's Transport Statement says that traffic flows along Broadway Road are low, the situation is complicated by uncertainty about the possibility that village access to the A358 from Broadway Road will be severed by the dualling of the main road, as indicated in the latest Highways England plans. Were that link to be blocked, Broadway Road and, then, Pound Road would be a tempting rat run for drivers wishing to reach Taunton via the road to Staple Fitzpaine or to the M5 via a new access to the motorway. That would be likely to significantly increase the traffic on Broadway Road.

The Parish Council is also very concerned at the road safety implications of creating an access from the proposed development close to the crossroads of Broadway Road, Hare Lane and Pound Road which would have the effect of increasing its use. Although the applicant's traffic safety report downplays the danger posed by this intersection, the Parish Council believes that increased traffic flows would make the intersection more dangerous. This is exemplified by the road traffic accident which occurred early in June 2018, which required the hospitalisation of one of those involved. The Parish Council notes that the applicant proposes traffic calming measures on Pound Road either side of the crossroads. The Council does not have the technical expertise to comment on the suitability of these arrangements. However, it does agree that improvements to the safety of the crossroads will be even more important if the development proceeds and that this should be a condition imposed if approval were to be given.

Concerns about pedestrian safety were a recurrent theme emerging from the consultation undertaken by the applicant and by the Parish Council. This is particularly so in the case of children walking to the Neroche Primary School and elderly people walking to the shop and Post Office in Goose Lane. The Parish Council does not believe that these concerns have been adequately addressed by the applicant, including by the proposed provision of a short section of pathway along Broadway Road.

Highway issues

The Parish Council does not consider that the existing road network is adequate to accommodate the level of construction traffic and the additional residential traffic referred to above. It is important that a construction traffic access plan is available to examine how disruption to traffic can be avoided were the application to be approved. For instance, one access to the site, off Pound Road, is over Whitebridge, a small stone bridge which is a dangerous pinch point on the road to and from Horton. The Council is unconvinced that all

the relevant traffic issues, including the danger posed by the short sight lines at the Pound Road/Broadway Road crossroads and the uncertainty about the volume of traffic likely to be using Broadway Road in the future, have been convincingly addressed. The Parish Council believes that the County Highways Department must be fully consulted on all highway safety and access matters.

Economic benefits

Paragraphs 8.4 and 8.5 of the Planning Statement set out what the applicant sees as the benefits to the local economy of the development. These are claimed to be approximately 53 direct construction jobs and 79 jobs created elsewhere in the supply chain. The Parish Council welcomes appropriate provision of new jobs in the area. But, even if the applicant's claims as to job creation are accepted, they are all temporary and are unlikely to have any impact at all on Broadway's economy after completion of the development, which of course would be permanent. Moreover, while the Government's National Planning Policy Framework advises that significant weight should be placed on the need to support economic growth through the planning system, no potential economic growth in the village has been demonstrated from the development proposed.

Conclusion

Paragraph 4.2 of the applicant's Planning Statement succinctly sets out the aspiration for the proposed development as creating *"a sustainable extension to the existing settlement with a scheme that maintains a traditional architectural style which respects the character of the settlement of Broadway."*

Broadway Parish Council believes that the application fails its own test. It believes that the development would be:

1. an anomalously large block of housing adjacent to an otherwise linear stretch of single dwellings in Broadway Road and Hare Lane;
2. a visible group of 2-storey dwellings out of scale with the neighbouring bungalows and the village at large;
3. an incongruous and visible addition to the landscape, particularly in winter;
4. a stylistically unconvincing and incongruous mixture of modern and traditional tropes unrelated to nearby dwellings or to the older, traditional buildings at some distance from it;
5. a wholly disproportionate contribution to meeting District housing needs for a village of its size and one which would accelerate the already excessive urbanisation of the Broadway;
6. a precedent for further large-scale housing developments in the village based on a District-wide housing need and not local demand;
7. liable to increase serious and unresolved concerns about road safety at the Broadway Road/Hare Lane crossroads;
8. unsustainable in respect of local transport;
9. of no significant long-term benefit to the village economy;
10. counter to the clear wishes of the village as expressed in the 2016 Broadway Housing Survey and the meeting on 19 June 2018;

11. and, in respect of those aspects which might otherwise have merit, including the creation of a pathway along Broadway Road, measures to calm traffic on Pound Road, provision of an area of public open space, a contribution to housing mix and the availability of affordable housing, insufficiently compelling to outweigh the many detrimental aspects referred to above.

The Parish Council therefore objects to the planning application. The Council would wish to put these points directly to the Planning Authority at the relevant meeting to consider the application.