

Milborne Port Parish Council

**Response to South Somerset District Council Consultation on Local Plan 2016-2036
Preferred Options Report**

September 2019

A. GENERAL OBSERVATIONS

A1. The Parish Council is generally supportive of both the goals of the Plan as drafted, and the policies set out to deliver upon those goals.

However, we can only support one of the two sites identified as preferred options for Milborne Port, and that support would be subject to a number of conditions.

We reserve the right to provide additional comments once we have received feedback from a number of SSDC cabinet officers following questions raised through Councillor William Wallace.

We reserve the right to comment further once the results of the Preferred Options Consultation have been digested and published.

We do note that many of the observations made by the Parish Council in the previous iteration of Preferred Options Consultation were not taken up by SSDC, nor followed up upon for further clarification.

A2. Numbers

A2.1 We are concerned by the overall number of dwellings being expected of South Somerset. We understand that this is a centrally imposed figure derived from national algorithms, but it does set the context for all guideline allocations to settlements. It is, however, decisive in measuring whether a 5 years housing supply exists. ONS figures provide the following projections for South Somerset (see Population Projections by District, 2016-2041).

For South Somerset this shows growth of 12,800 over the lifetime of the Plan. The Draft Plan states (see figure 5.5) that 15,538 new dwellings are needed for the same period, approximately 1.2 new dwellings per additional resident. Whilst the calculations almost certainly follow the protocols imposed centrally, they do not make a lot of sense to most residents from a 'man in the street' perspective.

A2.2 We are concerned regarding the calculation of a 5 year housing supply. Figure 5.5 states that, as of 31 March 2018 completions and net commitments over the lifetime of the Plan to date (two years) total 6,992. Against an expectation of 15,538 over twenty years it would seem odd to argue that a 5 year housing supply does not already exist. Figure 5.2 of the draft Local Plan states that an annual minimum delivery of 716 houses is required across the lifetime of the Plan. A straight line derivative of the total 15,538 twenty year target would generate 777 new houses each year. With 6,992 already (in March 2018) built or committed (with more since then) it would seem that the required level has been achieved, indeed significantly exceeded, for each of the years 2016, 2017 and through to March 2018.

Once again, the mathematics no doubt follow protocols, and we are aware the calculation is prospective, but residents are confused as to how, with nearly half the houses for 20 years already built or approved after 2 years of the Plan, this still equates to South Somerset failing to deliver a five year housing supply.

Population Projections by District, 2016-2041

	2016	2021	2026	2031	2036	2041	% change 2016-41
Mendip	113,100	116,600	120,300	123,300	126,000	128,200	+12%
Sedgemoor	121,300	127,000	132,200	136,600	140,400	143,700	+16%
South Somerset	166,500	170,300	174,000	176,900	179,300	181,500	+8%
Taunton Deane	116,000	120,800	125,300	129,100	132,300	135,200	+14%
West Somerset	34,500	34,600	34,900	35,400	35,800	36,200	+5%

Source: [Office for National Statistics](#)

A2.3 There is therefore a logical disconnect between the level of housing being demanded, the level of housing being delivered, and the analysis that a five year housing supply is not being achieved. This analysis may well still be accurate within the technical calculations set out by the NPPF, though this should be checked very closely, and a document better than the “Why we do not have a 5 year housing supply” placed on the SSDC website. However, it does not pass the sense test of the so-called “man in the street”. The failure to achieve a 5 year housing supply makes South Somerset vulnerable to predatory residential planning applications which can largely ignore the actual Plan. This means that “good” applications which satisfy the constraints and aspirations of the Plan may be sidelined in favour of more commercial, but less sustainable, or appropriate, developments.

A2.4 We have entered into correspondence with various SSDC officials regarding the methodology of allocation of guideline targets for development across the various settlements of South Somerset. We note from the 2017 Sustainable Development report that this is effected through a Red/Amber/Green analysis of various potential sites both to establish the overall guideline numbers of anticipated new dwellings in a settlement, and the specific preferred options within that settlement as to where that development might come. This is also supported by the HELAA program

However, we have been unable to elicit the mathematics through which these judgmental RAG ratings and HELAA outputs are converted into actual guideline settlement and site allocations of new dwellings. Rather we have been advised that this is effected by means of SSDC “exercising its professional judgment”. This does not seem to be a transparent or fair means of effecting Planning. We recommend that the process be made very much clearer; that there be iterative algorithms put in place to link the data to the numbers; and then a review, subject to public scrutiny, to confirm or alter the mechanical results.

Figure 5.5 Detail of Housing Requirements

Local Plan Review	Completions 2016-2018 as at 31st March 2018	Commitments - net as at 31st March 2018	Completions 2016-2018 as at 31st March 2018 plus net commitments as at 31st March 2018	LPR Housing requirement 2016-2036	Residual Requirement (any pending planning applications, planning permissions granted after 31st March 2018 and new LPR allocations are included within this number)
Yeovil	564	1640	2204	5,091	2887
Chard	31	474	505	1995	1490
Crewkerne	9	705	714	1194	480
Ilminster	14	105	119	839	720
Wincanton	62	281	343	563	220
Ansford/ Castle Cary	7	559	566	727	161
Langport/ Huish Episcopi	25	146	171	351	180
Somerton	80	354	434	574	140
Bruton	11	76	87	152	65
Ilchester	4	157	161	361	200
Martock/ Bower Hinton	45	75	120	330	210
Milborne Port	29	76	105	245	140
South Petherton	20	41	61	116	55
Villages	121	471	592	1314	722
Rural Settlements	157	653	810	1686	876
Total	1179	5813	6992	15538	8546

A3 Access to Appropriate Technical Expertise

A3.1 We have found, repeatedly, that it is extremely difficult to obtain access to appropriate officials at both SSDC and Somerset County Council levels with whom to engage regarding technical matters connected with planning. This includes (but is not limited to) areas such as health, environment, education and, in particular, roads. Whilst the exact reasons behind this are not clear, it appears that it is a combination of a lack of resource, and a degree of satisfaction at the district and county level that staffing to a planning level only is adequate, and there is limited or no need to have technical expertise in the various subject matters to hand when considering the merits of individual Planning applications, or when responding to public questions regarding, for example, whether a road junction is safe or not, or the level of likely negative environmental impact that a development might inflict, and how either of these might be mitigated or improved.

The Parish Council is frustrated regarding the lack of transparency in this area, and feels it could be improved significantly with limited effort or expense.

A3.2 We would therefore recommend that the Preferred Option Document, and the wider Plan articulate, as a matter of policy, that there will be an up-to-date, and easy to access via the SSDC website, list of the appointed official who is responsible to provide liaison regarding technical matters on applications regarding any given area of policy, and their contact details. This list should be confirmed or updated at least every six months, but we would prefer that it be updated following any change in roles, or where the official concerned is to be absent for a significant period of time (eg: health issues; maternity/paternity leave etc) with the temporary cover contact added for that period.

B. MILBORNE PORT – GENERAL OBSERVATIONS

B1. Conservation Area

B1.1 An extension to the existing Conservation Area has been proposed and was in principle approved by SSDC in the spring of 2018. There was a minor technical point which held up the formal approval, which we understand was cleared by summer 2018, and yet the final sign off on the extension has not, at the time of responding, occurred. We would like to see this finalised as soon as is practicably possible.

B.2 Poor Self-Containment; high levels of Out-Commuting; low Employment

B2.1 The Parish Council agrees strongly with the points made in 8.55.

B2.2 From a nadir in circa 2015-16, recent Employment development has been positive, with the Queen's Head site re-opening; the fish & chip shop opening a restaurant; the new, larger Co-Op under construction; and the Old Village School site being redeveloped into a restaurant opening October 2019. These are in part offset by the relocation of the Remous printing facility to Sherborne. However, Milborne Port will likely, by the end of 2019, have achieved its 2016-2036 target (0.1 hectares – see Fig.5.6 Employment Land Justifications) for net employment land increase.

B2.3 We believe that, despite this, the village should continue vigorously to pursue further appropriate, commercially viable, self-contained employment land development.

B2.4 We recommend that SSDC consider the undertaking of a more detailed study process, consulting with local (and indeed other) businesses, landowners, our elected representatives at both South Somerset and Somerset levels, and the Parish Council to determine whether there is a case for nominating further sites for Employment Land.

B2.5 The land at the site of Remous Printing should continue to be designated as Employment Land. This is consistent with point 8.62 regarding the vital status of the limited commercial units. We would recommend that SSDC undertake, with the co-operation of the landowner, a study to determine whether there is any limitation on that use due, for example, to the prior use of chemicals. We note its proximity to the school, and, if safe to do so, suggest it may be considered as a solution to capacity problems.

B2.6 Nonetheless, we anticipate that a sizeable amount of employment and business development in Milborne Port over the next 20 years will come from home-based businesses. To facilitate this further, we recommend that, for any housing development in excess of 10 dwellings, at least 20 percent of these should be constructed with the functionality to be used in-part as a business. The exact definition of this

would need to be developed, but could include open-plan ground floors to accommodate work-rooms; offices; salons and similar.

B2.7 With regard to point 8.62 The Queen's Head is now once more in use. The Co-op on Cold Harbour is likely to close once the new site on Gainsborough currently under construction is completed and opened. The library has now closed. It is to be replaced by a temporary facility, which will initially be parked in the East Street Car Park. It is planned that it will then relocate to the Community Hub once the first part of MIPO1 has been constructed. It is also envisaged that the Village Museum will use the Community Hub for specific exhibitions.

B3. Roads

B3.1 The Road infrastructure of Milborne Port is not good. It is frequently mentioned as being "unsafe" by local residents, and though there is rarely a technical analysis of why this is so, the point is nonetheless widely felt.

At its' pinch points, especially where the village roads connect with the A30, it is affected by a layout of both roads and houses from the 18th century and prior, which is scarcely fit for purpose in the early 21st century. In most cases our view is that these access points cannot be improved materially.

The Plan notes that an unusually high percentage of the working community are dependent upon cars for commuting or for home based service businesses. It is the perception within the village that traffic levels have been increasing materially over recent years. Hence, the addition of housing or employment development in locations served by Gainsborough, or Goathill Lane, are likely to be less problematic than those served by North Street. In turn North Street is better than other smaller access points. There is particular concern regarding the use of Rosemary Street, East Street/London Road to the A30, and the use of Lower Kingsbury to access Station Road out towards Charlton Horethorn.

B3.2 We believe the policy should state that future developments should demonstrate a reasonable dependence for access into and out of Milborne Port via the better roads such as Gainsborough, Goathill Lane (and therefrom, into Goldings Lane), or subject to further survey, and the actual implementation of such improvements as are determined, the North Street/Station Road axis

B3.3 There should be specific provision against multiple unit developments likely to be dependent upon Rosemary Street and Lower Kingsbury, and East Street/London Road. This may alternatively be achieved via a nominated hierarchy of access preferences/dispreferences.

B3.4 We recommend that a formal Road Safety Audit be commissioned by SSDC, or Somerset County Council on each of the junctions to the A30 within the village, to the junction between Lower Kingsbury and Station Road, to the various junctions off Wyke Lane, including in particular Manor Road and Court Lane. This list of locations is not exhaustive, and there may be others which would benefit from such an Audit. The purpose of the Audit would be two fold

- To determine which junctions are currently viewed as not satisfying the appropriate safety standards (we note this may well be for historic reasons when such standards were either different or not in place at all). Any achievable improvements should be set out as recommended actions .
- To determine the likely impact, subject to detailed analysis at an Outline Approval stage of any particular application, of an increase in traffic flow through the Audited junction, and likely areas for consideration that will need to be satisfied before any planning approval can be made.

B3.5 We would recommend that SSDC/SCC seeks to improve the flow of traffic around the centre of Milborne Port by assessing whether an improvement or enlargement of existing one-way systems might help.

B3.6 We recommend that SSDC/SCC evaluate by formal assessment whether the network of pavements along the lines of the roads could be improved and made safer (for example by widening one sub-standard pavement, and removing the other and realigning the given road). It might be helpful to list these in terms of urgency and achievability, and place time lines by which such improvements should be undertaken.

B3.7 We recommend that SSDC/SCC evaluate by formal assessment whether road widths within Milborne Port are adequate for the traffic utilising them, and in particular for larger vehicles including agricultural vehicles (often with towed machinery); delivery vehicles; waste management vehicles and emergency services.

B4. Parking

B4.1 The layout of the housing of Milborne Port, especially in the older parts of the village, means that road side parking is inevitable, as no provision for parking off-road was made at the time of construction.

B4.2 The high reliance on vehicles for commuting, or for home based service businesses, means that Milborne Port is more than usually vehicle heavy compared to average settlements.

B4.3 Hence, in addition to the normal regulation and guidelines that would be used for any settlement, we believe Milborne Port may benefit from a stricter parking environment. We have three recommendations in this regard.

B4.4 The first is that a review is undertaken to establish whether the establishment (and then enforcement) of a more comprehensive parking infrastructure be introduced. This may include the formal introduction of double yellow lines in areas where, by village convention, parking only takes place on one side of the road already (e.g. North Street).

B4.5 The second is that the level of parking provision required per dwelling in any new residential development be raised to reflect a likely two-three vehicles per dwelling. Further given that very few if any of the dwellings within the village actively utilise their garage for parking, we would recommend that garage space (though highly desirable in terms of the design and functionality of a dwelling) not be considered in determining the provided number of parking spaces for that dwelling.

B4.6 The third is that any new development should not infringe upon the existing habitual use of roads for on street parking, or should be required to provide adequate and proximate alternative parking facility at the expense of the developer for those already enjoying habitual use

B5 Utilities

B5.1 Sewage – We note point 8.67, that the ability of the village to manage sewage with existing foul water and treatment infrastructure may be nearing capacity. We concur that more precise assessment of this is needed, but would seek to see a formal time frame for this, and the execution of any recommendations arising from it, articulated more clearly either within the policy itself or by separate order.

B5.2 Water Pressure – In recent development applications there have been conflicting messages regarding the water pressure applicable around the village. In particular the experience on site at the fire on Bazzleways, and the analysis of the functionality of the water provision since then, do not correlate. We would wish to see SSDC manage a formal assessment of water pressure at all points within the village (and wider parish including Milborne Wick and Goathill) involving both the fire service and Wessex Water to determine and publicise formally what the water pressure is for each area, and how that compares to requirements. If this elicits recommended improvements a time defined plan should be put in place to execute upon these.

B5.3 Internet Connectivity – We note and approve of the points made by 12.11e within the draft plan. However, given the high reliance on home-based business in Milborne Port, and the reduction in services within the village since the turn of the century, we believe that there is potential for a heavier focus on this point specific to Milborne Port. We would therefore recommend that all new developments of more than 5 dwellings be required to provide fibreoptic connectivity, and that this should be done in a manner that enables other existing dwellings access to any hub that brings such connectivity closer to them.

B6. Flood Risk

B6.1 We note the comments in point 5.4 regarding areas of flood risk (mostly around the Gascoigne River) but would also link these to point 8.67 regarding sewage issues due to groundwater flooding during periods of heavy rain. This elicits concern regarding the impact of new construction not only at the sites being developed but also lower down within the drainage topography. At present, the requirement that there be no worsening of existing surface water run-off, at both the site and any

destination points, as a result of new development is being observed in Planning approvals (primarily through conditions usually satisfied by attenuation features). Given the specific issues already identified by Wessex Water, and SDSDC, as being experienced by Milborne Port, we would recommend that this general provision be expanded for Milborne Port and that any new development be required to demonstrate no deterioration to existing surface water run-off and to sewage infrastructure performance.

B6.2 A number of the most recently constructed or outline approved applications have drained into the unnamed watercourse which runs north to south on the eastern side of the settlement, along the bottom of the topography between East Hill and the village itself. This includes the Solar Farm; the two developments to the south of Wheathill Lane; and the recently approved application on the western section of MIPO1 north of Wheathill Lane. It would likely be the destination of any further development of MIPO1, and a number of other nearby sites identified in the most recent HELAA, but not nominated for preferred options status. It would be helpful to obtain a definitive assessment of the capacity of this drainage feature to cope with the resultant changes in its drainage profile, and its likely capacity to accommodate future development that might drain into it. Any recommendations that arise from this could then be added into conditions applicable to any future successful applications.

B7. Neighbourhood Plan

B7.1 In August 2019, the Milborne Port Parish Council approved, in principle, a proposal to develop a Neighbourhood Plan. An application in this regard will be submitted in due course to SSDC.

B8 Environmental Issues

B8.1 Milborne Port has sought and achieved the status of a plastic free settlement.

B8.2 The Parish Council notes and approves the various aspirations articulated with regard to Low Carbon Travel articulated in point 12.11 and policy TA1. In specific terms related to Milborne Port we would like to see point 12.11d be articulated via an aspirational commitment to the establishment of a safe cycle route, separate from the A30, between Milborne Port and Sherborne within the lifetime of the Plan.

B9 The School

B9.1 We have been advised that the village primary school has now reached capacity, subject to the construction of the housing developments at Gainsborough and the western half of the site north of Wheathill Lane. There is, we are advised, no further capacity to develop the size of the school at its existing site, because the remaining outside area is required for safe monitored play. This is already done in shifts, as the outside area does not have the space to accommodate all pupils at the same time.

B9.2 We note the comments of point 8.66 that there are no critical infrastructure needs, and this may well have been true at the time of drafting. However, it would seem that the situation at the school has

now become critical. In dismissing the appeal of application 17/03964/OUT for 56 dwellings at the top of Station Road, the inspector specifically stated that he did not consider the issue of the school because the capacity issue had been identified only after the public hearing had been scheduled (the appeal was turned down based on access safety grounds). However, he nonetheless raised significant concerns around whether material further housing development could be approved before the capacity issues at the school were solved. He further stated that the idea of bussing primary school aged children to other villages by way of a 'solution' was undesirable in the extreme ("the antithesis of good planning").

B9.3 We therefore recommend that point 8.66 be reworked to place a priority on solving the issue of school capacity. The most sensible approach would appear to be utilisation of sites close to the existing site to establish facilities for a section of the student population (see also C2.4 and C2.5). However, we do not prejudge this, and recommend that 8.66 states that SSDC will work with the Education Authorities, the school Governors, the School Executive, and Parents to determine options and then proceed on this basis. It would also be helpful to set out clearly what the implications for any future residential applications would be prior to the agreed solution being put into effect.

B10. Provision of Affordable Housing

B10.1 We note policy HG2 regarding the provision of affordable housing. We approve the general strategy behind this. We note that the applicable percentage appears to have been reduced from 35% to 29%. We are concerned about this as a general point. However, we believe this is of specific interest in Milborne Port itself.

B10.2 We are aware of the 2018 survey that was carried out and that, based on respondents from Milborne Port, a relatively low need for additional affordable housing was identified. However, we believe there are some systemic weaknesses in this analysis. Anecdotally, those most in need of affordable housing are least likely to complete such surveys. The survey did allow for other residents to volunteer data regarding persons with whom they lived (eg family members) who needed such housing. Of course, many of those who have been affected have already left the settlement, and hence are not aware of the survey taking place.

As a Parish Council the feedback we receive on this point is, overwhelmingly, that persons who grew up within the village are increasingly unable to afford to continue to live in it at key stages of their lives, most notably when moving out of their parents' accommodation, when starting to co-habit, and when starting a family. There are also concerns around retirement, with some feedback that retiring residents of the village feel unable to compete for property with incoming retirees from other parts of the country.

We suspect that, given the comparatively lower levels of self-contained Employment within the village, articulated in 8.55, and the anecdotal loss of long term residents due to property prices, and their replacement by commute based residents, Milborne Port has a higher than usual issue with emigration than would be the case across South Somerset as a whole.

B10.3 However, we have also received feedback that, when presented with the opportunity, persons resident in Milborne Port, who would qualify for access to such housing, do not actually apply for it. There is potential concern therefore, that this historic low take up by locals might result in viability claims by developers in the future, gradually reducing the overall percentage of affordable housing within the village.

B10.4 The provision of affordable housing is an important tool in maintaining the social integrity of any settlement. However, within Milborne Port such provision addresses not only the generic concerns in this regard, but also concerns raised by village's specific dynamics.

B10.5 On balance, given the anecdotal nature of the evidence being given to us, the Parish Council is content to follow SSDC's 29% in Policies HG2 and MP1, but would urge SSDC to keep this under close review.

B10.6 However, we would be interested in considering geographical or connectivity tests being attached to any such housing that becomes available due to future development, so as to prioritise access to local or connected residents. We are aware that such restrictions and preferences can be difficult to enforce, and impossible if there is no demand from qualifying individuals, but we believe that, at worst, it would be a helpful statement of intent. The Parish Council would be happy to work with SSDC and with the Milborne Port Commonality, to increase the awareness of such opportunities, and, importantly, encourage qualifying residents to register themselves as potentially interested parties.

C. PREFERRED OPTIONS

C1. Headline Response

- We cautiously approve site MIPO1 subject to a number of conditions
- We continue to oppose site MIPO2, for a number of reasons including those set out in previous consultations, and as per the decision of SSDC itself of 23 September 2014 with regard to application number 14/01055/OUT
- Given numbers already delivered and committed across South Somerset as a whole and Milborne Port in particular, we question whether there is rationale for nominating an alternative preferred option site in Milborne Port to “replace” MIPO2,.
- We would prefer that further residential development arises from windfall accretions to the overall numbers (of which at least three are in process in September 2019, all of which have received the support of Milborne Port Parish Council).
- Preferred alternatives to MIPO2 would be sites accessible via Gainsborough onto the A30. In particular the land at Wynbrook Farm and, by preference, provided access issues can be overcome, the Land north of Manor Road. We also note the issue of the landscape classification for site E/MIPO/0003 off Goldings Lane, but given the relatively good access to this site, we believe that, on balance, consideration might be given to preferred status, subject to heavy qualification regarding landscape and heritage impact. There would have to be sensitive mitigation and protection of assets but this may be possible to achieve.
- It might be helpful that the data analysed by the HELAA be “scored” and then the merits of all sites presented in a tabulated form across all the assessed areas set out in the RAG rating in the Sustainable Development Report, so that the echelon of preferred options could be made more transparent. It would also make it more understandable to residents, even where they did not agree the output.

C2 Land North of Wheathill Lane

C2.1. We stress our “cautious” approval of the site as a preferred option, and that this is only subject to a number of conditions.

C2.2 Two Sites - The remaining eastern side of the site should be considered as a separate location to the western component that has already received outline approval. The two sites have different owners and the remaining part of the site could only be delivered by means of a separate planning application. However (see C2.9) we would like to ensure that where the agricultural status of the, as-of-yet undeveloped, remainder of the site has been used for mitigation of the environmental impact on the component that has been given outline approval, that this mitigation is maintained in any proposal put forward for development of that remainder. A similar approach should apply to landscape impact, given the location on the periphery of the village and the excellence of the views to and from East Hill.

C2.3 Access – We believe the site would be best developed as a cul-de-sac rather than a through road.

The Draft document infers that access should be through the outline-approved western sector of MIPO1.

We believe there are strong arguments for vehicle access via Wheathill Lane to the south, rather than through the already approved western half of the site (whose indicative layout does not provide for such access). This would

- limit the use of the roads through the residential components of both sites as “rat-runs” reducing the risk of unnecessary annoyance, and mitigating safety concerns, particularly for children, the impaired and the elderly.
- Avoid the concreting over of the border between the two sites and hence preserving wildlife corridors , and maintaining the integrity of the surface water management infrastructure proposed for the approved western site
- Maintain the existing public footpath which runs between the two sides of the site without the need for road crossings.

However, we also believe there are arguments access to be to the west via the outline-approved half of the site. In particular these focus around road quality for the increased levels of vehicular traffic that would arise from further development:

- A southern exit point might increase the use of Wheathill Way-East Street-London Road for access to the A30. These residential streets are very narrow, especially in areas where they have cars parked on-road on both sides (Wheathill Way) or on one side (East Street). The junction between London Road and the A30 is particularly poor, especially where the West facing sight line is blocked by the corner building. Whilst poor, the North Street access point onto the A30 is better (and safer).
- Even were all traffic to follow the realigned Wheathill Lane and then exit via Station Road/North Street onto the A30, Wheathill Lane itself is a narrow road, again especially where it has on-road parking.

We therefore recommend that consideration be given by SSDC as to what the optimum means of access to this site might be, and why (with input from the Roads and Highways Authorities), for discussion with Milborne Port Parish Council and local residents.

C2.4 Playing Field – the playing field that sits as an inset on the southern boundary of the balance of the site should be maintained as a recreational facility

C2.5 School Extension – Consideration should be given as to whether the site might, in part, be used for an extension of the school (alternatively, this might incorporate the inset playing field). It is close to the existing school site and would have relatively good general pedestrian access particularly once the western part of the site was built. If it is considered that an extension to the school might be located here (or perhaps a relocation of the swimming pool, and the use of its current site for an extension of the teaching part of the school), then it is likely that the pedestrian access between the two sites would need to be examined, with especial focus upon the provisions for the safe crossing of roads.

C2.6 Surface Water – We would be interested to see what SSDC’s view would be on surface water management. The approved western half of the site will be using a new drain down Wheathill Lane, turning right down Wheathill Road and then out across the field at the end of East Street into the drainage system in the copse at the corner of that field. However, the field in question is privately owned by the vendor of the outline approved site.

The topography of the eastern part of the site is below the level of the Wheathill Road turn off, and so surface water would need to travel uphill in order to reach it. This may be achievable via appropriate pumping facilities but would presumably involve initial and ongoing cost to do so. We would therefore anticipate attenuation facilities with ultimate drainage down Wheathill Lane and into the same unnamed watercourse at the foot of the topography. Regulations will require that surface water run-off is no worse at the site or its destination than is currently the case. However, separating the two run-offs to different channels, even if the ultimate destination is the same, may well lead to a reduction in overall risk.

C2.7 Parish Museum - the site immediately to the east of the remaining part of MIPO1 is a Parish owned property, which currently houses the Parish Museum. It is anticipated that, at least in part, the Parish Museum will utilise the Community Hub building in the outline-approved section of MIPO1 for exhibitions, but the Museum as is will continue. However, the use of the existing building is currently hampered by difficulties with parking, and it is possible that earmarking some space on the north side of Wheathill Lane in the remaining component of MIPO1 would enhance the functionality of the Parish Museum, which forms an important part of the Parish’s heritage and its educational and recreational infrastructure.

C2.8 Playing Fields Buffer Zone – the northern boundary of the undeveloped element of MIPO1 abuts directly onto the Memorial Playing Fields and there is a high likelihood of footballs and cricket balls continuing to clear the fence and land in the site. We would therefore recommend that an appropriate buffer zone of undeveloped land be left in place to accommodate this and also to provide an ongoing wildlife corridor to mitigate the impact of development on the site.

The Parish Council owns a small parcel of land at the eastern end of this northern boundary and would give serious consideration to opening this up as a recreational space for the public, were it possible to install a public footpath through such a buffer zone. In particular, this might be a solution to an ongoing issue with dog fouling on the existing public footpath through the site, and on the Memorial Playing Fields themselves.

C2.9 Environmental and Ecological Impact – The agricultural status of the undeveloped remainder of MIPO1 has been used in the environmental and ecological impact mitigation plan for the western component that has now received outline-approval. Hence, to an extent, any further development of MIPO1 will impact not only the land upon which development occurs, but also that which has already been approved for development in the adjoining field. We recommend that the environmental or ecological mitigation plan of any future applications for the balance of MIPO1 be required to

demonstrate that it accommodates both its own impact, and that presupposed in the approval of the western part of the site which was determined with the eastern part as agricultural in nature.

We would also note that, whilst the proposed built areas of the outline-approved western part of the site are of medium density, the remainder of the site has significant amounts of open and green space. We would recommend that the proposed layout of any proposed development of the remaining eastern part of the site be consistent with that applicable to the west, with plenty of green space. Given that such a development would abut open countryside, and be the first built area in line of sight from East Hill and the Millennium Viewing Point, this requirement is made even more important.

C2.10 Business Use – We believe that development of the remainder of this site is likely to be the first major (in the context of a village such as Milborne Port) development following the Local Plan 2016-2036 consultation exercise, and may even take place prior to formal adoption in 2021. As such the recommendations on home/business use (B2.6); Parking (B4.5); and Internet Connectivity (B5.3) should be applied even prior to adoption.

C2.11 Footpath – the public footpath that runs along the eastern side of the outline approved component of the site, and would be at the western boundary of the remainder, should not be changed.

C2.12 Numbers – We see two separate lines of argument. The remainder of the site is quite substantial, indeed likely equal to, or larger in size than the western half already given outline approval. It may, therefore be possible that a higher number of houses could be borne by the site, and this should, we would hope, make it more commercially attractive, and hence make the accommodation of many of the various benefits to the village from improved Museum parking; expansion of the school; the Playing Field buffer zone; the extended layout with much green space on environmental and landscape impact grounds; and so on more viable.

However, these recommendations all require space, which, in turn, cannot therefore be used for residences.

We recommend that further consideration be given by SSDC as to whether 45 further dwellings is the right guideline expectation for the remainder of this site. However, we believe that any increase in this number (indeed the use of this number at all) should not be undertaken without direct linking to the conditions we have outlined.

C3. Land South of Court Lane

C3.1 We continue to oppose development of this site. To the extent that SSDC have issues with this position, we would be happy to discuss them in greater detail, and indeed would anticipate that such a discussion would be prompted by and welcomed SSDC prior to any decision to proceed with this site as a preferred option.

C3.2 We note that a number applications for development of the site have been rejected, most recently in September 2014 (application 14/01055/OUT). The reasons given for refusal were:

- Inability to respect the form, character, setting and distinctiveness of the locality, and would result in unacceptable material harm to the character and quality of the local landscape
- Insufficient evidence that demonstrates no adverse impact on the local highway network
- Loss of high quality agricultural land
- Poor public transport, lack of available jobs, reliance on private travel for employment and service facilities contrary to the core principles of the NPPF
- Lack of adequate mitigation of the risk of surface water and foul drainage flooding

We believe that all of these issues continue, or may continue, to apply. However, there are a number of additional considerations that have come to light since 2014 which enhance some of these points

C3.3 Local Character and Landscape – the proposed extension of the Conservation Zone would abut the southern and eastern boundary of the site, and any development thereon would therefore impact the environment of the conservation zone.

Further, the location is of interest from a heritage perspective. Court Lane is named after the Baronial (Manorial) Court that was held there for the settlement of Kingsbury Regis, which forms the northern part of Milborne Port. Kingsbury itself means King's Borough, and is believed to have been the site of an Anglo-Saxon Royal Mint. It is for this reason that Milborne Port had two Members of Parliament until the Great Reform Act of 1832.

The various buildings to the east of the site down Court Lane likely all date back to, at the latest, the 18th century (the Manor Court itself was still in operation in 1805, and probably only ceased in 1832). This includes the buildings at the foot of Court Road which, whilst they look much more recent are actually the sites of labourers' cottages for Manor Farm.

We believe that development of the site at all, and certainly with 30 houses, is unlikely to be consistent with the local environment and the setting of the new Conservation Area and historical assets. We strongly oppose any development of the site, and were this for whatever reason to go forward, it would have to be on a much smaller scale, with rigorous consideration given for architectural design and layout that is in sympathy with the location and its heritage.

C3.4 Roads – The observation regarding the junction with Wick Lane (8.60) is valid, but perhaps not the worst issue regarding road access to the site. In order to gain access to the A30 vehicles would need to pass through the centre of the village and would then either be led up onto Station Road/North Street and add to traffic volumes at the bottleneck North Street/A30 junction; or, worse, exit via Rosemary Street. Access to the more accommodating Gainsborough would only be possible via Manor Road, which, with vehicles parked on road, including numerous home-based business vehicles, and often multigenerational occupation with several vehicles per dwelling, is not a functional thoroughfare. Going north to exit the village on Station Road towards Charlton Horethorn, vehicles would inevitably use Lower Kingsbury which is a narrow lane on a steep hill, with a narrow switchback bridge at its foot.

It seems to us that the wider limitations on access through the village were not fully considered in either the HELAA, the committee planning decision or in this proposed preferred option paper

C3.4 Public Transport/Available Jobs/Reliance on Vehicles for Commuting or access to services – All of these continue to be issues. The public transport provision has deteriorated since 2014, with a reduction in buses. Employment and concern regarding the unusually high levels of commuting continue to be specific and identified issues for Milborne Port and are acknowledged as such within the draft Plan. Tucked away as it is on the fringes of the least accessible part of the village we see no real prospects of this site improving the employment capacity through home-business development, and given the road access constraints it is questionable whether this would be desirable.

C3.5 Surface Water and Foul Drainage – whilst it should not be beyond the wit of a developer to put in appropriate surface water mitigation measures (though noting that it drains into a location of flood risk and the applicant failed to do so to the satisfaction of SSDC in 2014), the sewage issues are of much greater concern. Problems have arisen with sewage along the line of the Gascoigne River due to surface water confluence, and it is into this part of the system that foul water would logically go. We are far from experts in this field, but, logically, adding more sewage into a system that is already encountering issues does not seem likely to improve the situation.

C3.6 Summary re MIPO2 – we do not support this site as a preferred option, and, whilst we would clearly need to look at the detail of any future proposal, we do not anticipate that we would support development at this site at all. There are better sites, if sites are genuinely needed as preferred options, but we also feel that a number of the identified reasons for the 2014 rejection of application continue to exist, and are generic to the site itself, rather than specific to any weaknesses in that specific application.