

7th April 2025

Via email Jennifer.alvis@somerset.gov.uk

Dear Ms Alvis

Ref: 2025/0276/OUT

Site Address: Land At 380339 152196 Great Dunns Close Beckington Frome Somerset

- 1.1. Context Planning Ltd have been instructed by Beckington Parish Council to prepare a representation to the above planning application. We have been asked to review the application and report the findings to the Parish Council. This report includes our findings including our overall conclusions.
- 1.2. The application seeks outline permission with all matters reserved except for access for the development of up to 35 dwellings, public open space, landscaping, sustainable urban drainage system and engineering works, with vehicular access off Bath Road.
- 1.3. The site is located outside of the defined settlement boundary of Beckington. The site is sited close to the Beckington Conservation Area. The site sits within the Mells Valley Special Area of Conservation Consultation Zone.
- 1.4. Upon review of the current proposals, whilst the development delivers a number of planning benefits including the delivery of housing in an area with a lack of 5-year land supply, it is evident that the scheme raises a number of significant planning issues and concerns that weigh against the development. Each main issue is taken in turn below.

Planning history/background

- 1.5. Beckington has recently been subjected to several planning applications for major development. The Council are currently considering two further major applications for residential development at Beckington. Application reference 2024/2309/FUL seeks

planning permission for 24 dwellings at Land at Tower Hill Farm Bath Road Beckington BA11 6SH, and application reference 2024/1865/FUL seeks planning permission for the erection of 20 dwellings and associated works at Great Dunns Close.

- 1.6. The Parish Council have already objected to the two aforementioned applications. Whilst the Parish Council have concerns with each application, consideration must also be given to the cumulative impact of the schemes, if more than one of the three applications is granted. Whilst the Parish Council object to each of the three applications, the applications cannot be considered in isolation from one another.
- 1.7. Appeal decision reference APP/Q3305/W/21/3288474 (LPA ref 2020/2298/OTS) which was seeking permission for a development of up to 45 dwellings and associated works at Land North of Warminster Road, Beckington is also material to this application. This appeal was dismissed in October 2022 with a number of harms being found, including the development being considered to represent the disproportionate growth of Beckington, and there being a lack of supporting infrastructure in the village to support the additional growth. Whilst each application is judged on its merits, there are direct comparisons that can be drawn between this appeal and the subject planning application.
- 1.8. Local Plan Part 2 (LPP2) was adopted in December 2021 identifying additional housing and employment sites within the former Mendip area. Since the site was considered unsuitable at that time, the application site was not put forward as an allocation in LPP2.
- 1.9. During the LPP2 Examination, National Highways made objections to development allocations in Beckington, reflecting its concern over traffic movements on the A36. These focus on capacity of roundabouts east of Beckington. Policy DP27 was included in the Plan reflecting agreement between promoters, Mendip Council (as was) and National Highways to require financial contributions for highway improvements. The implications of this will be dealt with below in the Highway Impacts section of this report. Notwithstanding this, no sites were allocated in Beckington.
- 1.10. Following a Judicial Review into LPP2, a number of site allocations, were deleted from the plan and remitted to the council for reconsideration. The High Court ordered that the Council review and reconsider allocations to meet the district wide requirement for 505 dwellings in accordance with Core Policies 1 and 2 of Local Plan Part 1 (LPP1); and in

light of the review, prepare and publish modifications to LPP2 which allocate sites and submit these for examination.

- 1.11. Following a call for sites and a district-wide review, the Council consulted on proposed housing allocations in the former Mendip area to provide 505 dwellings by 2029. Despite again being promoted by the applicant and the need to find new sites, the application site was not put forward for allocation. This site was still considered to be unsuitable as Beckington was already significantly in excess of CP2 requirements, there was no education capacity, there were drainage issues in the village which made the delivery uncertain and the development was impacted by the A36 improvement requirements. The extract from the 'Summary of Site Options' is copied below'.

Beckington													
Land Ref	Submission status	Site	Ha	Planning Status	CP1 & 2 compliance/ sustainable location	Policy Conflict	Site suitability/ Delivery by 2029	Delivery Risk by 29	Sustainability Appraisal - impacts	Strategic constraints	Max Units	Proposed Allocation	
BECK026	Re-promoted	Land at Wallmead Farm, Bath Road, Beckington	2.4		Village significantly in excess of CP2 plan requirement/ No education capacity/ drainage issues in village. Accessible local services.		No -impacted by A36 improvements - uncertain delivery/ multiple options in village	Very High	mixed - some positive - some key negative impacts incl drainage	Yes -A36 capacity issues	40	No	

Figure 1- Extract from 'Summary of Site Options by Settlement Appendix 3 to Proposed Site Allocations Consultation Report'

- 1.12. The Council submitted the Limited Update proposals for examination on 30 September 2024 and the Hearing took place in March 2025. The Council are expecting a note from Inspector shortly summarising main modifications considered necessary to make the Limited Update sound.

Principle of Development

- 1.13. Local Plan policy CP1 seeks to achieve the most sustainable pattern of growth by directing the majority of new development to Frome, Glastonbury, Shepton Mallet, Street and Wells ("Principal Settlements"). In rural areas, new development is to be provided in Primary Villages and Secondary Villages.
- 1.14. Policy CP2 explains that the delivery of housing will be secured from infill, conversions and redevelopments within the development limits as defined on the Policies Map, subject to compliance with national planning policy and specific policies within the Local Plan, particularly matters relating to design, local distinctiveness and identity and amenity. The policy makes it clear that development outside the development limits will be strictly controlled and will only be permitted where it benefits economic activity or extends the

range of facilities available to the local communities. This proposal sits outside the settlement boundary, in open countryside, and would not benefit economic activity or extend the range of facilities in the village. The proposal is manifestly in conflict with the terms of CP1 and CP2.

- 1.15. Policy CP2 of LPP1 sets out the distribution of housing for the district over the plan period (2006 to 2029). The Council's overarching spatial strategy is for 80% of the district's housing growth to be accommodated within the five main towns, which are overwhelmingly the most sustainable settlements capable of accommodating significant additional growth. The latest housing completions data shows however that, since the start of the plan period, the villages within the former Mendip area have already delivered 1708 dwellings with a further 668 granted planning permission but not yet completed. This figure is already in excess of the entirety of the planned for commitment over the plan period (1,780). Further, 463 dwellings have been built in open countryside with a further 362 granted planning permission but not yet completed. Overall, the dwellings permitted in open countryside represent 33.25% of the total housing requirement of the plan, rather than 20% as planned for. This is clearly contrary to the spatial strategy of the Local Plan.
- 1.16. Based on the above figures, it is clear that housing delivery within the former Mendip district has been skewed, with excessive levels of development approved in the villages, well beyond what may be considered sustainable. If this application is permitted, it would further skew delivery in direct conflict with the spatial strategy.
- 1.17. Paragraph 4.31 of the supporting text to CP2 explains that one of the two broad principles in distributing new rural development was that levels of new development in each place should be appropriate to their existing scale and have regard to environmental constraints. The Council sets out village housing requirements based on a proportionate growth equating to 15% of the existing housing stock of that village. The principle of proportionate growth and planned housing being provided at a scale commensurate with the existing housing stock is enshrined within CP2.
- 1.18. Based on a 15% growth, CP2 therefore indicates 55 new homes as a reasoned scale of housing growth in the village of Beckington during the plan period. The latest monitoring report shows that 111 dwellings were either completed or granted consent between 2006 and March 2024. The village has therefore delivered significantly in excess of CP2

requirements and the Plan period still has 4 years left to run. The quantum of 111 covers those dwellings granted planning permission in Beckington but does not include those dwellings in the surrounding smaller settlements which have a physical and/or functional connection to Beckington. If these are taken into account, the number would be even greater and increase the disproportionality.

- 1.19. The housing stock already delivered in Beckington is over double the village requirement. Whilst the local plan figure of 55 dwellings is not expressed as a maximum, it is evident that this level of growth was considered both proportionate to the scale of the village and appropriate to meet local housing needs. If planning permission was granted for this development, it would result in a 40.5% increase of the housing stock in the village during the plan period, and the village having delivered 265.5% of the Local Plan target. The plan still has 4 years to run and further infill and windfall developments are likely to come forward in that time, further increasing the housing numbers.
- 1.20. If the application is granted planning permission at Great Dunns Close and Tower Hill, alongside this application, this would result in a 52.75% increase in the housing stock in the village, and the village having delivered 354% of the Local Plan target. Individually or cumulatively, this can in no way be viewed as a proportionate addition. The 2024 Annual Monitoring Report outlines the growth of the primary, secondary and other villages within the former Mendip area. This shows, that if the current applications are all granted planning permission, Beckington will have seen more growth proportionally than any of the 52 villages in the district.
- 1.21. The significant concerns with the resultant disproportionate growth of the village was recognised in the Site Options Appraisal (post JR LLP2) where it was stated that the site was not suitable for allocation due to the fact that housing growth in Beckington was already significantly in excess of CP2 requirements. There is no reason to reach a different conclusion at this stage. The proposal would be disproportionate to the scale of Beckington, and even more so, if combined with development at Great Dunns Close and Tower Hill, and it is therefore in conflict with the spatial strategy of LPP1. It is evident therefore due its countryside location and the disproportionate growth, the development would be contrary to CP1, CP2 and CP4 of LPP1. This conclusion was echoed in the appeal decision at Warminster Road in Beckintgon (ref APP/Q3305/W/21/3288474).

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- 1.22. The Parish Council started work on their Neighbourhood Plan in 2024. This recognises the need for additional housing, but this must come forward at the right time, in the right place. At this stage, the Parish Council have not been informed of its identified housing requirement within the emerging Somerset Local Plan.
- 1.23. Any approved major planning applications in Beckington have the potential to have a detrimental impact upon the preparation of the Neighbourhood Plan. Notwithstanding the growth already experienced, if there is deemed to be a requirement for additional housing within Beckington to cover the emerging Somerset Plan period, the allocation of a housing site within the Neighbourhood Plan would allow for the housing to be delivered through a Plan led system, alongside any supporting infrastructure required.

Weight to be given to housing policies

- 1.24. Whilst it is accepted that the policies most important for the determination of the application are by default 'out-of-date' having regard to footnote 8 to NPPF paragraph 11(d) given the lack of a 5-year housing land supply, it is still argued they still hold significant weight.
- 1.25. The weight to be afforded to policies, depends on their degree of consistency with the terms of the NPPF. The basic principles of CP1, CP2 and CP4, that the majority of development should be in the five towns, that the primary villages are the most sustainable in the rural area and that their individual growth should be proportionate, do not conflict with the NPPF, remain valid and should be given significant weight.
- 1.26. LPP2 has sought to significantly boost the supply of housing, and the examining Inspector was clear that the Council were seeking to demonstrate a rolling 5-year housing land supply. Whilst the former allocations were deleted from the plan, the proposed allocations have now been considered at Examination, and the LPA are therefore taking the necessary steps towards seeking to remedy the shortfall in accordance with a plan led system. LPP2 commits the Council to a local plan review process which will be undertaken as part of the development of the new Somerset Plan. Somerset Council have recently undertaken a 'Call for Sites' but the responses to this have yet to be published.
- 1.27. In this context the terms of CP1, CP2 and CP4 can be afforded significant weight, despite being out-of-date, for the purposes of this application. These policies are consistent with

the advice and approach of the NPPF. This is consistent with numerous appeal decisions in the former Mendip area including appeal reference APP/Q3305/W/21/3288474.

Highway Safety/Capacity

- 1.28. Policy DP9 guides that development will be supported where it makes safe and satisfactory provision for access by all means of travel and servicing.
- 1.29. The applicant's Transport Assessment (TA) provides details of a traffic survey, but it accepts that as this was undertaken during travel restrictions due to Covid 19, the movements do not represent a realistic scenario. Notwithstanding this, the TA concludes that due to the small number of movements associated with the development, a new traffic count, or further modelling is not required. However, it does not appear that the cumulative impact of committed development has been considered. Committed development that impacts upon the A36, both within the Somerset Area, and the Wiltshire Area (Warminster etc) must be factored in. National Highways have already raised concerns, and each development permitted, will further exacerbate that harm.
- 1.30. As noted above, during the LPP2 II Examination, National Highways raised objections to development allocations in Beckington due to concerns about traffic movements on the A36, specifically focusing on the capacity of roundabouts east of Beckington. Policy DP27 was included in the Plan to reflect an agreement between promoters, Mendip Council (as was), and National Highways, requiring financial contributions for highway improvements.
- 1.31. Policy DP27 did not establish a design specification, costings or timescales for implementation. The improvement works are not part of the Somerset Council highway programme, and it is not yet clear who will be responsible for implementation. The application at Selwood Garden Village (for a mixed used development including 1700 homes) was expected to contribute to the key infrastructure measures needed, but there is uncertainty with the outcome of this application which has now been called in by the Secretary of State for a decision, with a public inquiry due to commence at the end of July this year. Without this scheme in place, it is hard to see how these improvements will be bought forward.
- 1.32. Without the improvements, in particular upgrading the A36 Beckington roundabout, the cumulative impacts of new developments in the village are likely to have a severe impact

upon the highway network. Again, the cumulative impacts of this development, alongside any others that may be approved or have recently been approved, must be considered and each application cannot be considered on its own.

- 1.33. Whilst financial contributions can be used to mitigate harm, and in this case contribute to any necessary improvements to the highway network, the LPA must have the comfort that they will be used in a timely manner for the purpose secured and meet the statutory tests set out in CIL Regulation 122. Without the improvements in place, the development when considered alongside other committed development, has the potential to have a severe impact upon the highway network. At this stage, it does not appear that the LPA have comfort that these improvements will be undertaken prior to the occupation of any development approved being occupied.
- 1.34. Careful consideration must be given as to whether the required visibility splays can be provided and retained in perpetuity, especially if any of the land within these visibility splays is outside of the applicant's control. The access to the site is located in close proximity to the busy access serving Beckington Service Station and associated facilities, and therefore the potential for conflicts with other vehicles and pedestrians is increased.
- 1.35. DP10 explains that parking should be provided at an appropriate level, but that regard will be had to the objective of reducing the growth in private vehicles and the need for on-site provision to prevent problems of highway safety. The TA confirms that as the final housing mix is not known, calculations relating to detailed parking provision have not been undertaken. However, when considering the parking standards as set out within the Somerset Parking Strategy, it would appear that insufficient parking has been provided within the proposed illustrative layout. There also appears to be a heavy reliance on garages, and perpendicular parking with in places, the indicative layout showing 3 parking spaces running perpendicular to one another. This form of arrangement is inconvenient for end users and often results in users attempting to park off site.
- 1.36. A failure to provide adequate on-site parking, will lead to indiscriminate parking within the site, or on the adjacent highways, leading to the obstruction of the highway and consequential highway safety problems. Whilst it is acknowledged that that the parking provision will be dealt with at reserved matters stage, it must be considered now, whether or not the site can accommodate the quantum of development and the associated parking

proposed. Any need for an increase in parking spaces will have resulting impacts on the character and appearance of the development, with the additional parking spaces likely to mean less green space. Thus, parking and access routes are likely to dominate the development, leading to a poor-quality environment and further loss in rural character.

Health Care Facilities

- 1.37. LPP1 CP4 seeks to ensure that where development imposes burdens which exceed the capacity of existing facilities, new development is phased for delivery in line with improvements to the relevant infrastructure. The policy stipulates that the timing and detail of all contributions will be carefully considered in order to ensure that appropriate infrastructure or mitigation measures are delivered and put in place before the development is completed and/or occupied.
- 1.38. The Parish Council have previously raised concerns with regards to the lack of capacity at the nearest GP Surgery in Beckington. The proposed development is for 35 dwellings, and this will create an estimated of population of 78 new residents within the development. However, there are three major applications being considered simultaneously, with a total increase in residents of approximately 174 residents.
- 1.39. The NHS Somerset LPA Engagement have advised that the current combined medical centres providing primary care will not be able to absorb the increased patients arising from the proposed development. The only way to mitigate the impact of this development is to increase the physical capacity of the existing surgery. The contribution they have required is £22,235.
- 1.40. However, this contribution is futile unless the GP Surgery can be extended. Planning appeal reference APP/Q3305/W/21/3288474 (Land at Warminster Road) considered this matter. It was evidenced during this appeal that there was a pressing need to extend or relocate the main GP surgery in Beckington. However, there is insufficient space within the current GP site to expand the surgery. No solutions have been found to extend the current provision and therefore, the harm cannot be overcome through a financial contribution.
- 1.41. The increase of 78 new residents, or 174 when considered alongside the pending applications, would add significant pressure on the GP Surgery which is already operating

over its capacity. The situation is worse than when considered to be unacceptable by the Inspector.

- 1.42. The necessary infrastructure measures cannot be in place prior to the development being occupied, and there would therefore be conflict with policy CP4. A consistent approach should be taken to the aforementioned appeal.

Landscape/character

- 1.43. Policy DP1 advises that all development proposals should contribute positively to the maintenance and enhancement of local identity and distinctiveness across the district. DP4 relates to Mendip's landscapes and records that outside of designated landscape areas, proposals should demonstrate that their siting and design are compatible with the landscape character area. Policy DP7 advises that the Council will support high quality design which results in usable, durable, adaptable, sustainable and attractive places. Proposals should be of a scale, mass, form and layout appropriate to the local context and protect amenity.
- 1.44. It is accepted that the site is relatively well screened, although there are views through to the site from the A36 as well as glimpsed views from more long-distance locations. Despite the existing screening, the site still has an undeveloped rural character, and this forms part of the setting of the village. Beckington has organically grown over time away from the historic core, but the rural setting of the village has been maintained due to the green buffers and the rural edge. Although Beckington Services is on the A36, this is not part of the village and remains visually associated with the A36, serving users of that route as well as the Beckington population.
- 1.45. The scheme would alter the character of the site through the introduction of a formal vehicular access and associated visibility splays, two and a half storey dwellings, and a tall acoustic screen along the eastern boundary. This would represent an encroachment of urban form onto undeveloped space at the edge of the village, altering the character of Beckington. Whilst the screening around the site would filter views, the development would still be easily discernible from the A36, and some wider views, particularly if the dwellings were two and a half storey. The character of the entrance to the village at this point would also change, with the removal of green infrastructure to facilitate the access.



Figure 2 – View of the site from the A36

- 1.46. Lighting associated with the development would also change the character of the site particularly when viewed from the A36. The lighting from the dwellings and from any street lighting would increase the prominence of this site in the hours of darkness. Whilst there is some screening in place, the light spill from the development will bring Beckington village right up the boundary with the A36 further reducing the rural setting of the village and the historic legibility of Beckington.
- 1.47. As would be expected at edge of village locations, the density of development reduces as you move from the historic core of Beckington towards the open countryside. The development would result in the edge of the village being marked by a high-density cul-de-sac not reflective of local character. It is likely that the development will appear suburban in nature, dominated by the access and parking, and by features such as close boarded fencing. Whilst the illustrative plan shows 'street lined trees' as encouraged by the NPPF, the actual ability to deliver this at reserved matters stage is questioned given the requirements of the parking provision to serve 35 dwellings.
- 1.48. Reducing the quantum of development to allow for a more spacious development with improved green edges, and more green infrastructure to break up the built form, could help reduce this harm. Currently it is not considered that the development complies with the relevant local plan policies which seek to ensure that development reflects local distinctiveness and a high-quality environment.

Residential amenity

- 1.49. The site is located close to a small number of residential properties on Goose Street. The Parish Council would ask that careful consideration is given to the impact upon their amenity, particularly given the change in levels, with the application site being set up above those dwellings on Goose Street. The proposed layout has the potential to result in large gable ends becoming oppressive and overbearing features at the end of the rear gardens of Goose Street, particularly if they are two and a half storey in height. Based on the proposed layout, there appears to be little scope for additional planting to soften this impact. Whilst the situation may be improved by a change in layout at reserved matters stage, there are questions as to whether the site is of a sufficient size to accommodate 35 dwellings and retain sufficient buffers at the boundary of the site.
- 1.50. The site is located adjacent to the A36 and as such the application is accompanied by a noise survey. The results of the noise survey indicate that mitigation will be required to reduce internal and external noise from the A36 during the daytime and night-time.
- 1.51. The Council's Environmental Health Officer has not objected to this application subject to a condition to ensure that a Verification Report is submitted to demonstrate that the noise mitigation scheme outlined in Section 7 of the Wardell Armstrong report of January 2025 has been implemented. However, the mitigation is not sufficiently detailed at this stage, and it is not considered that the condition as suggested is sufficient. No details have been provided to explain how the dwellings fronting Frome Road would be designed to ensure they meet the required internal noise criteria. If the sound attenuation measures require windows to be kept closed, it is questioned whether this is the right site for development.
- 1.52. The reports also concludes that acoustic fencing may be required between 2 and 3 metres in height depending on distance and garden orientation. This would consist of fencing along portions of the site boundary adjacent to the A36 and along garden boundaries with direct line of sight to the road. Tall fences, particularly those at 3 metres height would not be acceptable within the development, as this could result in an oppressive and poor-quality environment. Close boarded fencing is also not typically reflective of this rural location.

Open Space and Green Infrastructure

- 1.53. Policy DP16 explains that new development should contribute towards the provision of new open space, including accessible green natural green space to meet the needs of the growing population.
- 1.54. Whilst the submission explains that development will deliver the requisite open space, this should go further than simply looking at the quantum proposed. Although an indicative green space strategy has been submitted, the green space proposed is not considered to be of sufficient quality. The green space on the indicative plans, is formed by small tracts of land set adjacent to the access road and dominated by attenuation ponds or set next to the A36 so will not be a tranquil or enjoyable environment. The area to the south of the site, slopes towards Goose Street, which again reduces the functionality of this space.
- 1.55. The green space should be more integral to the development so that it can be multi beneficial. Whilst this could be dealt with at reserved matters, there are concerns that this could not be achieved based on the quantum of development proposed, particularly as it is likely that an increased number of parking spaces will need to be provided. Consideration should be given to whether the development also triggers the need for a financial contribution for off-site improvements to the local equipped play area to meet the demands of the future residents.
- 1.56. As illustrated, the development therefore fails to meet the needs of the occupiers of the development, and conflicts with Policy DP16.

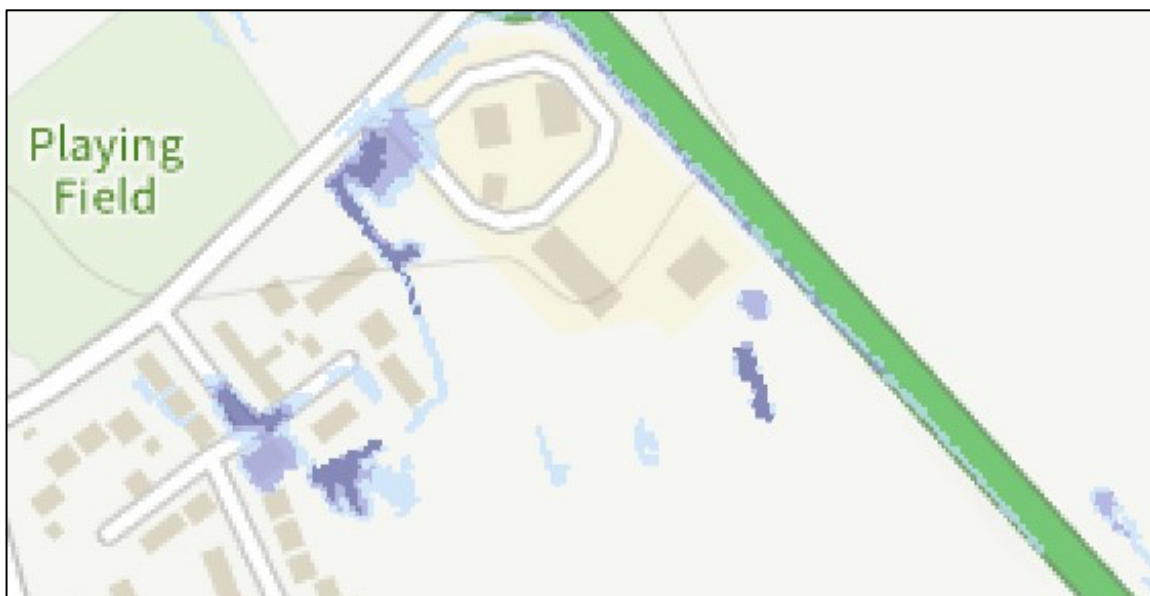
Ecological Implications

- 1.57. The application was accompanied by an Ecological Report which assesses the impact of the development. This appears a detailed assessment, although it explains that further bat surveys will be undertaken from April 2025 to June 2025.
- 1.58. The report explains that lighting within the development has the potential to impact on commuting/foraging bats by causing avoidance behaviour and therefore habitat fragmentation effects which can impact upon the success of roosts and viability of populations. Thus, it recommends that a sensitive lighting strategy should be implemented to keep all lighting on site to a minimum. It cites that any new external lighting will be in line with recommendations in the 'Bats and Artificial Lighting at Night' (ILP & BCT, 2023).

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- 1.59. Insufficient information appears to have been submitted at this stage to demonstrate that the necessary light levels can be achieved. The siting of the access road through the site will need to be lit to ensure safe pedestrian access. The access road will not be overlooked by any neighbouring properties and will therefore be an undesirable route at night if it is not well lit. It would appear that based on the current information, there is a conflict between the need for this space to provide a safe attractive route, and the need to maintain a dark bat foraging/commuting corridor.
- 1.60. The dwellings within the site are also located relatively close to the commuting/foraging routes, and again light spill from these dwellings may be excessive. Whilst luminance levels have been provided to account for street lighting, it does not appear that the light spill from dwellings has been considered. This must be dealt with at this stage to ensure that the approved amount of development can be accommodated at reserved matters stage whilst retaining the dark corridors and not impacting on the bat population.
- 1.61. At this stage, it not considered that there is sufficient information to confirm that the development is ecologically acceptable to accord with policy DP6 or whether it is likely to significantly affect the Mells Valley Special Area of Conservation.

Surface Water Flooding

- 1.62. Policy DP23 of LLP1 is in place to manage flood risk. All development will be expected to incorporate appropriate water management measures to reduce surface water runoff and ensure that it does not increase flood risk elsewhere.
- 1.63. The Lead Local Flood Authority (LLFA) has raised a number of concerns with the submitted Flood Risk Assessment (FRA) and proposed surface water drainage strategy. It is critical that the development does not increase flood risk elsewhere and remains safe through the lifetime of the development.
- 1.64. The Environment Agency's (EA's) Flood Risk Map shows the site has areas of a high and medium risk of flooding from surface water, both at the access and within the site. It is therefore imperative that the flood risk is correctly assessed, and the level of flood risk understood.



EA Surface water flood risk map

- 1.65. LLP1 Policy DP23 sets out a sequential approach to flood risk management, giving priority to the development of sites with the lowest risk of flooding. The NPPF also outlines the requirement for a sequential test to be undertaken for development in areas of flood risk, from all sources of flooding. This Sequential Test ensures that a sequential, risk-based approach is followed to steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. Development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.
- 1.66. Even where a flood risk assessment shows the development can be made safe throughout its lifetime without increasing risk elsewhere (which has yet to be demonstrated), the sequential test still needs to be satisfied. No sequential test has been submitted. Whilst the high-risk area only covers part of the site, the access is within this area, and it is likely that further built form will also be within an area of high risk. The lack of coverage across a whole site, does not negate the need for a sequential test.
- 1.67. The development is therefore contrary to policy DP23 as it cannot be demonstrated that the sequential test is passed, nor that the development will not increase flood risk elsewhere and the development will remain safe through its lifetime.

Foul Drainage

- 1.68. In relation to foul drainage, it is well recognised that there is a historic and ongoing issue in the village due to a lack of capacity in the local network. It is vital that the LPA are satisfied that a robust strategy to deal with foul drainage is in place, including for management in perpetuity. The lack of confidence in securing suitable strategies was one of the reasons why this site was not allocated.
- 1.69. A high volume of water (combined foul and surface water) already flows to the Beckington Waste Water Treatment Plant, exceeding the capacity of the Plant. This is resulting in the discharge of untreated water into the River Frome in 'Combined sewer overflow' (CSO) events. In 2023, there were 31 CSO events, totaling 458 hours. This has significant environmental consequences.
- 1.70. Whether or not there is capacity to connect to the foul network at Bath Road, due to capacity being reached at the Treatment Plant, the development is likely to result in further CSO events, adding to the frequency and/or duration of discharges of untreated wastewater into the River Frome.

Planning Balance/Conclusions

- 1.71. The key objectives of Core Policies 1, 2 and 4 as regards the distribution of development and proportionate growth are consistent with the NPPF. These policies should therefore still be afforded significant weight. It has been demonstrated that Beckington has seen growth during the plan period, well in excess of the planned growth, achieving 238% of the Local Plan target. Whilst it is noted that the target was not a maximum, this was set at a level that was considered to represent proportionate growth. The village has already well exceeded this number, and the development as proposed would result in further unacceptable disproportionate growth to the village, skewing the spatial strategy which seeks to deliver the majority of the growth in the most sustainable main towns. The plan led system to accommodating development in the most sustainable locations should not be ignored.
- 1.72. It is recognised that additional growth is likely to be required in villages in the future, particularly in the light of the new housing need figures. However, the need for a plan led system and the NPPF requirement for sustainable growth is important. Development must

come forward in the right place and at the right time, with the necessary infrastructure in place. The Neighbourhood Plan and emerging Somerset Plan will seek to address these matters, and the oversupply of dwellings at this time would compromise this position.

- 1.73. There are significant concerns that this development alone results in disproportionate growth of the village. However, if planning permission is granted for either of the two pending major applications in Beckington, the cumulative impacts must also be considered. Altogether they would result in Beckington, as a village, proportionally, having seen the most amount of growth in the district.
- 1.74. Linked closely to the above point, there are concerns that the local GP surgery does not have capacity to absorb the additional population generated by the proposed development, nor does the local highway network have the capacity for any significant increases in vehicular movements. Further, in terms of open space, the development does not meet the need of the future residents.
- 1.75. It has not been demonstrated that flood risk and foul water drainage has been sufficiently addressed. Moreover, the development would result in negative changes to landscape character, particularly due to the loss of the rural edge of the village. The development, for various reasons, appears to represent the overdevelopment of the site, which would further impact upon local character and distinctiveness.
- 1.76. Whilst it is recognised that the delivery of market and affordable housing are a significant benefit and should be given weight in the planning balance, the benefit of housing in this location is tempered in comparison to the benefit of housing being delivered in for example, a more appropriate location at one of the five towns in Mendip district, which would accord with the Council's spatial hierarchy and would be significantly more sustainable. It is recognised that there are further benefits flowing from the development, including economic benefits through the construction period, and through additional spend in the village. These however are relatively limited in scale.
- 1.77. As the policies which are most important for determining the application are out-of-date, paragraph 11 advises that permission should be granted unless:
- the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination

- 1.78. Taking these matters together, it is argued that the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole. In this case there are no material considerations which indicate that a decision other than in accordance with the development plan should be taken. I would therefore urge you to refuse the application.

Kind regards

Tessa Hampden – BSc MA MRTPI

Context Planning LTD