

# SHOCK

**STOP HOUSING OBLITERATING THE CHARACTER OF KEINTON**

**PUT THE STRATEGY BACK IN PLANNING**

A CRITIQUE

by

SHOCK

of

THE SSDC PROPOSED POLICY OF DESIGNATING RURAL  
SETTLEMENTS AS VILLAGES SUITABLE FOR  
DEVELOPMENT

## **Introduction**

1. This critique has been prepared by SHOCK (Stop Housing Obliterating the Character of Keinton), the campaign group representing the villagers of Keinton Mandeville in their opposition to a housing estate on fields west of the village proposed by Land Value Alliances - (South Somerset District Council (SSDC) Planning Reference 22/01720/OUT). SHOCK has around 150 email subscribers, and 450 villagers have joined SHOCK in registering their formal opposition with SSDC. References to paragraphs and tables in this document are to the SSDC policy document "The Potential for Rural Settlements to be Designated 'Villages' "(November 2018).
2. In this context SHOCK has examined a central tenet of the draft Local Plan proposed by SSDC - the designation of rural settlements as villages suitable for growth through new development ( based on 2010 data) - for convenience referred to as 'the RS policy', Part 1 of the submission explains why, even if development in rural settlements were to remain an appropriate planning policy, Keinton Mandeville is not a rural settlement suitable to be designated as a village for future development. Part 2 questions whether the RS policy is, in any case, sound, or, indeed, consistent with modern planning policies and priorities.

## **Summary**

3. **Keinton Mandeville should not be listed as a 'Village' suitable for further housing development because:**
  - **The SSDC assessment is based on out-of-date information:**
    - **The village has no bus service (this is by itself enough to exclude Keinton Mandeville from the list)**
    - **The village has no medical services or facilities**
  - **Far from needing an influx of residents to sustain its viability:**
    - **The village school is over-subscribed and still waiting for new classroom space**
    - **The village hall is likewise insufficient for the needs of existing residents**
  - **Development in rural settlements is predicated by the NPPF on the existence of adequate infrastructure not requiring significant investment. This is not the case for Keinton Mandeville since:**
    - **Its sewerage system cannot cope with the current loads imposed on it**
    - **Its roads are unfit and unsafe for current traffic levels**
  - **Since 2016 93 new houses have already been built in the village, an increase of 25 per cent; from 417 to 510. This is a disproportionate and excessive contribution even if the RS policy were to apply to Keinton Mandeville.**
4. **The RS policy should be abandoned by the Unitary Authority because:**
  - **It surrenders strategic planning to market forces**
  - **It does not satisfy identified local housing needs**
  - **It is not supported by, or consistent with, the National Planning Policy Framework (NPPF) in that:**
    - **It promotes unsustainable development**
    - **It is contrary to environmental objectives**
    - **It is inconsistent with the need to revitalise market towns and rural centres in Somerset.**
  - **It is undemocratic, failing to take account of local communities' views or to promote rural self – determination.**

## Part 1

5. SHOCK's view is that it is not appropriate that Keinton Mandeville should be designated a village capable of further development for the following reasons:
  - the village has already suffered over-development
  - the data about the village on which judgment was based is now out of date, and that judgment is not in keeping with NPPF policies and principles
  - the analysis of whether the village met the designation criteria was superficial
  - far from sustaining or enhancing the village (and making it more viable) further development would overload its already strained facilities and infrastructure
  - The village cannot sustainably meet the needs of local inhabitants who rely on social and affordable housing.

### Over-development: 2016 to date

6. Comparing developments in rural settlements (the bottom tier of the 5-tier planning hierarchy) with the existing Local Plan 2006-2028 targets show that, as a category, rural settlements have contributed 189% of their target (2702 houses against a target of 1432). In addition, the distribution of new homes within each tier has become highly distorted. Although there is no formal distribution amongst the 102 rural settlements, Keinton Mandeville only has 1.96% of the total homes in the tier (490 out of 25,006) but has contributed 3.48% of new development (94 houses out of the total of 2,702). In a recent planning appeal, the Planning Inspectorate recognised the principles of proportionality and consistency across the hierarchy and the legitimacy of an argument that a settlement has already contributed its quota of new homes. In passing SHOCK notes that, if approved, the current LVA application for 120 homes would distort the settlement hierarchy even more significantly, both between the tiers (rural settlements compared with the other 4 tiers) and within the rural settlements tier (Keinton Mandeville compared with other villages).

### Data purportedly supporting the designation of Keinton Mandeville

7. This section looks at the data used by SSDC to justify including Keinton Mandeville in the list of rural settlements with scope for further development by reference to the checklist used by SSDC itself.
  - *Absence of local employment opportunities:* There are no existing or potential employment opportunities within the village itself, as the Review recognised. Inhabitants of working age will have to commute to work by car (if they are not working from home)
  - *Lack of public transport:* Keinton Mandeville does not now enjoy “multiple bus services daily” (Figure 3.5). It is simply not feasible to get to work by public transport from the village. Figure 3.5 and para.3.20 of the RS policy in fact show that the absence of public transport was a decisive and explicit factor in including or omitting a settlement from the list. A decision based on up-to-date data would exclude the village
  - *Absence of medical services:* The ‘drop-in’ service run by the Millbrook Surgery (Castle Cary) was discontinued in the pandemic lockdown and has not resumed. It is unlikely to resume, given the significant extra demand from new housing in Castle Cary, and spare capacity in GP practices nearer KM
  - *Primary school places:* The village school has struggled to cope with new pupils from the spate of new building in the village since 2016. It is oversubscribed and is currently waiting for a new (sixth) classroom to be built (now delayed again beyond September 2023). In the interim, common areas equipped for ‘one-to-one’ work, and reading practice, and the library, have had to be sacrificed in order to create

room for a further classroom. It has taken well over 5 years to get funding for an extra classroom and work has still not yet started on it

- *Community facilities:* Likewise, the village hall is used to capacity throughout the week, and money is being raised to expand its footprint (with the addition of a second hall) to accommodate more groups, classes and meetings that are waiting to use it
- *Infrastructure:* The analysis of Keinton Mandeville by SSDC also makes no mention of infrastructure. In fact, the RS policy is justified in part on the basis that it minimises the need for infrastructure investment across the SSDC area. But this must then involve an assessment of the state and capacity of the infrastructure in the rural settlements concerned. Logically, if, in fact, a village's infrastructure needs significant investment that factor must disqualify it from designation. Keinton Mandeville is such a case. It has a foul water/sewerage system dating from the 1970s. It is a gravity-dependent system of small bore (6") pipework. It is already unable to cope with the burden of foul water produced by the Lakeview development. Residents in lower Queen Street and Common Lane not infrequently suffer sewage overflows into the street and their front gardens, and the ditches of Common Lane fill up with sewage. This is a severe and obvious constraint on the potential for any significant development in Keinton Mandeville. It was not mentioned in the RS policy, perhaps because the severity of the problem became apparent only with the rapid expansion of the village from 409 houses to 502 over the period from 2016 to 2022. If a water utility has a legal duty to connect approved dwellings to its existing network this is all the more reason why this consideration must be taken into account by a planning authority at the stage of outline planning permission when the decision of principle is taken. The author is aware that this is the policy adopted by some planning authorities, such as West Oxfordshire DC which, like the UA, is under the control of Liberal Democrats.

### **Superficial analysis**

8. In proposing the designation of Keinton Mandeville as a 'village' with the potential for further development one of the criteria used was transport accessibility. It is said that "[the village] *is easily accessible via the A37, a short distance to the east.*" Accessibility, in a planning context, or otherwise, is not the same thing as proximity. While Keinton Mandeville is not far from the A37 the physical constraints of the village road network, and the burden (and speed) of traffic do not make for easy accessibility to the A37 via the B3153 or Queen Street/Common Lane. The B3153 carries some [500] vehicles a day, with a much higher incidence of HGVs (looking for fuel-saving shortcuts) than was the case when the RS paper was written. SHOCK surveys confirm that the preferred, shortest route east to the A37 is via Queen Street, with its bottlenecks at either end. There is also an increasing number of traffic accidents (major and minor) along this part of the B3153, for which Somerset Highways is able to offer no solution. Many of these have occurred in the village centre where schoolchildren and pensioners are often present on the narrow pavements.

### **Affordable Housing Needs**

9. For all the above factors, the village is not suitable for residents who need affordable housing. By definition, they are usually young people (often with families) who need public transport and/or facilities and services on their doorstep. Not only are some of the key services (bus and medical services) entirely absent, but others are oversubscribed, including education services.

### **Conclusion on Keinton Mandeville**

10. In conclusion, the village does not need more houses/residents to sustain or maintain its viability. They will overwhelm it. Nor is it an environment naturally suited to the needs

of those in social and affordable housing. Most importantly, it does not meet the criteria for designation set by SSDC itself.

## Part 2

11. SSDC explained the basis for facilitating development in rural settlements as a reflection of “*this somewhat arbitrary situation*” where, despite the emphasis of the existing Local Plan (2006 -2028) on larger settlements, rural settlements in fact contributed 21 per cent of new dwellings (including commercial buildings) against a planned 14 per cent. SSDC’s draft Local Plan responded by seeking to encourage such development further, bowing to market forces (a combination of speculative financial investors and wealthy landowners) and, we say, mistakenly legitimising “*the arbitrary situation*”. However, SSDC did not set out a cogent strategic rationale in planning terms to support the policy other than by referring to the NPPF objective of sustaining viable local communities. Nor did it support the proposed change of policy by any evidence of the kind which the NPPF suggests is a pre-requisite.
12. SSDC sought to harness market forces (see para. 2.4 ‘Rural settlements’). But market forces are no substitute for strategic planning to meet local housing needs. Nor did SSDC consider whether the dwellings delivered in rural settlements meet the actual local housing needs identified in the region, as opposed just to meeting an obligatory centrally imposed target number (now abandoned). Certainly, in Keinton Mandeville, ‘market forces’ have contributed 93 homes in the period 2016- 2022. Of these only [...] per cent have been affordable/social housing, and [...] per cent executive homes. As a door-to-door survey by SHOCK confirmed the majority of the executive homes have been purchased by incomers from outside Somerset moving from other well-off parts of the country, and several Millfield parents from overseas. Against this, informal surveys of villagers by Keinton Mandeville Parish Council in 2010 and 2017 found that the priority was for affordable/starter homes, and smaller homes enabling pensioners to stay in Keinton Mandeville but downsize. These views are now confirmed by a more formal survey undertaken in the context of developing a Neighbourhood Plan for the village. The housing needs of other villages in the SSDC area are no different from those expressed by Keinton Mandeville residents, as their Neighbourhood Plans confirm.
13. The RS policy of SSDC also seems at odds with the NPPF in a number of respects:
  - it fails to give sufficient and required priority to the redevelopment of brownfield sites, the vitality of town centres, or the efficient use of land (parts 5, 7 and 11 of the NPPF). Market towns and rural centres in Somerset are badly in need of revival and regeneration and the Levelling Up and Regeneration Bill will give planning authorities new powers to achieve this
  - it promotes development which does not support sustainable transport objectives. This is because rural communities have few, if any, public transport options and the residents of new dwellings will inevitably be car dependent. If they are also living in affordable/social housing, they are not likely to have the money to run cars. They will be marooned in rural areas where most, if not all, essential amenities are a car-drive away. This is bad social policy and bad planning, which will result in bad communities!
  - it also seems neutral to negative as regards other key themes of the NPPF: coping with climate change; protecting the environment (particularly because of the car-dependency aspect of rural development); and effective use of land (to the extent it encourages the unnecessary loss of farmland and countryside and discourages the use of brownfield sites, contrary to government policy.

- it is not conducive to meeting the need for affordable/social housing. By their nature developments in rural settlements are generally small scale and therefore cannot, as current law and policy stand, contribute substantially to the types of housing most needed. Market forces do not deliver affordable homes sustainably or in suitable locations or numbers
  - Equally, the policy does not encourage the construction of dwellings which allow village pensioners to downsize but stay in their community of choice. Allowing market forces free rein means that new dwellings will be chosen which as experience already shows, maximise the profit of the landowner, promoter and developer, without fulfilling local needs. This is already demonstrated by the Lakeview development in Keinton Mandeville on the former central quarry site.
14. The 'RS' policy seems based on 2011 census and other data from that period. Retail, social, demographic, and financial factors have changed radically since then. It is also these changed macro and national factors which drive the viability of rural settlements, not local population numbers or small-scale developments. For example, the lack of public transport (as local authority funding is cut and private operators scale back routes) is a cause of greater isolation. Recent new factors are the closure of pubs, post offices and community cafes. For these reasons, in SHOCK's view, the RS policy proposed by SSDC was always bound to fail. In fact, the saving of rural settlements is likely to be the recent trends for families to move out of cities and the greater acceptance of working from home, supported by the government's financial support for the accelerated roll-out of fibre broadband in rural areas.
15. It is also SHOCK's view that the policy was not based on a sufficiently deep analysis of the relevant data. The only real basis in the NPPF supporting the RS policy is the promotion of sustainable development in rural areas "*located where it will enhance or maintain the vitality of rural communities.*" (NPPF, Rural Housing, para. 78). This justification for rural development, the only one in the NPPF, involves three questions: is the viability and vitality of the rural settlement at risk; do the settlement's amenities, services, and infrastructure need an injection of houses and people to survive; and, finally, are small scale developments a remedy? In the case of Keinton Mandeville the answer to all three questions is 'No'.
16. A Local Plan should not be about building homes willy-nilly to meet questionable numerical targets. Developments should promote social, economic, and environmental objectives, meet the needs and aspirations of local communities, and enhance individual and societal well-being. SSDC's Rural Settlements Policy fails all these objectives and, if resurrected by Somerset Council, will also fail the people of Somerset.

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