



LOCKING PARISH COUNCIL



The Parish Hall, Grenville Avenue, Locking, BS24 8AR
Telephone 01934 820786 E-Mail:- lpccclerk@talktalkbusiness.net

6th September 2019

The Planning Inspectorate,
Room 3/J
Temple Quay House
2 the Square
Bristol
BS1 6PN

Appeal Reference APP/D0121/W/19/3229938

Dear Sir,

TOWN AND COUNTRY PLANNING ACT 1990 APPEAL UNDER SECTION 78

Site Address: Elm Grove Nursery Elm Grove Locking

Application Reference: 18/P/2652/OUT **Appellant's Name:** Gladman Developments

Appeal Reference APP/D0121/W/19/3229938

Further to the Parish Council meeting held on 5 September 2019 and a Parish meeting held on 29 August 2019 to gain the views of residents, I have been instructed to write to you and advise that Locking Parish Council strongly object to the above mentioned outline planning application and stand by their submission's dated 23 June 2015 and 21 May 2018. Further more the Parish Council makes the following additional representation:

Policy NS CS1 – Addressing climate change etc

This application fails to meet Policy CS1 by not maximising the use of sustainable transport solutions or even seriously contributing to the same. It also fails to offer a satisfactory network of multifunctional green infrastructure or to enhance or protect the bio diversity of the area, which is rich in animal and other life.

Policy NS CS3 – Environmental Impacts on flood risk management

Locking Village has an historic and worsening flooding problem, especially in the Elm Tree Road and adjacent land area, which is in flood zone 3 and susceptible during times of heavy or prolonged rain fall. Inadequate drainage, coupled with over flowing of rhynes and drains, influx of raw sewage and tidal back up all contribute to this serious issue and the flooding of properties and blocking of Elm Tree Road. This application is unable to provide sufficient mitigation for the loss of land and natural drainage that will be caused by this development, exacerbating the existing flood issues and causing damage and distress to existing property owners.



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Policy NS CS4 – Nature conservation

The site lies within the Horseshoe Bat Zone B consultation zone. We draw your attention to another development approved on the edge of the Locking Village Settlement Boundary – 17/P/5572/OUT – Land off of Bartletts Way Locking. That site lies within Horseshoe Bat Zone C and it was a planning requirement from the District ecologist that a 5 metre wide x 120 metre long strip of land was required to provide planting for wild flowers to promote insects for the bats – which are the highest concentration in the UK. No such proposals are brought forward in this case. Therefore, without due diligence, any permission granted needs to be mindful that Councils have historically been prosecuted for not implementing sufficient measure to protect such species. As an outline application with no provision made for such an area or even consideration to light pollution that also deters bats from flying into areas for feeding, this application, without due diligence has the ability for potential prosecution by Nature England for not protecting such species by any person granting permission.

Policy NS CS10 – Transport & Movement

This application offers no solution to the absence of suitable pedestrian and cycle access on Elm Tree Road, particularly to connect to the existing A370 network, necessary for pupils at Worle Secondary School and residents wishing to use the nearest supermarkets and other facilities. Neither do the plans mitigate against increased traffic congestion through the village and beyond.

Policy NS CS11 – Adequate Parking

Bearing in mind the poor public transport provision in the village (1 bus per hour – often already full when it reaches Locking inbound to Weston-super-Mare) the development has inadequate off road parking to meet likely residents needs – A minimum of two/three off road spaces are required, not including garages which are often inadequate to house vehicles in addition to household equipment (freezers, mowers etc).

Policy NS CS14 – Distribution of New Housing

The Parish Council accepts the principle that North Somerset needs to provide new housing and indeed has accepted proposals and development of approx., 3950 dwellings within the parish at Locking Parklands, a former brown field site to the north of the historic settlement. However, we believe that it is important that the village is not subsumed into a suburb of Weston-super-Mare and the new “Weston Villages” development, hence our support to maintain the approved Strategic Gap which this application seeks to destroy.

Policy NS CS20 – Employment

The NSC Core Strategy calls for 1.5 jobs per home to be delivered for sites of 10 or more dwellings. This application fails to meet that requirement and will result in whole scale commuting via already congested roads to employment elsewhere – notably in the Bristol area.



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Policy NS CS33 – Smaller settlements and Countryside

Locking Village is classed as an Infill village and therefore falls in this category. Policy states that development outside of the village boundaries will be strictly controlled to protect their character and prevent unsustainable development. This application will result in an increase in this smaller settlement by around 20% which is against the policy. We would also argue that no attempt has been made to market the site for continued economic use, in particular to meet a growing need for local food production or allotments.

North Somerset Adopted Sites & Policies Plan Part 2

Page 67 of the Adopted Core Strategy suggests 2100 new dwellings for Service Villages, which Locking Parish is not a service village.

Page 17 of the Adopted Sites and Policies Plan (Part 2) adjusts this figure to 2143 dwellings, of which 158 are anticipated from Windfall allowance for the remainder of North Somerset (inc Locking Parish) for the period 2006-2026 of which 7 years remain. This scheme is for up to 110 dwellings which is the majority of the Windfall Allowance.

This scheme is against policy SA9 of the same policy document – strategic gap. Therefore, the application does not comply with the up to date adopted planning policies.

Highways Access from South Lawn

We note that this is proposed as an ‘Emergency Access’ plus footpath and cycle route for pedestrians.

There is nothing to suggest how this will be restricted to such uses and that residents of any new development would not use the route to enter and leave the site. As such, the access needs to be considered as a full highway access.

With this in mind, there is no control over the neighbouring properties at numbers 18 and 22 South Lawn – as identified on the attached map. There is nothing to stop the owners of these properties planting hedges immediately adjacent to the boundary with no restriction on the height of any hedge.

It should therefore be a consideration that as there is no control of these outside factors, the applicants will not be able to control the said access and the future provision of such hedging will result in visibility splays not being able to be met in accordance with the Manual for Streets Visibility splays (pages 92 & 93) as attached. This is therefore against National Policy for Highway Safety and should therefore be a reason for refusal.

Locking Parish Council Chairman Cllr Paul Jones and Cllr Elfan ap Rees are to represent the Parish should you wish to call them to the inquiry.

Yours sincerely

Dawn Tremlett
Clerk to Locking Parish Council



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