

Rode Parish Council

Matter 2 – Sustainability Appraisal and Habitats Regulation Assessment

(i) Is the Sustainability Appraisal (SA) (Second Addendum) (January 2020) for the proposed Main Modifications, i.e. for the 505 additional dwellings in the north-east of the District, robust in its methodology and conclusions?

1. This document was produced by Mendip in response to ED20 and is based on an acceptance that there is a shortfall of 505 additional dwellings and that sites should be found for these in the North/North-East of the District.
2. But as argued in responses to the questions covered in Matter 1, we believe this is based on a misinterpretation of LPP1. So asking if the SA is robust does not need to be addressed as it is testing possible solutions to the supposed shortfall.
3. As a further comment in the context of Rode, the SA RD1 notes *"This site was initially considered unsuitable for development, however in the light of the Inspectors note could be potentially suitable provided the heritage impacts can be satisfactorily mitigated."*
4. Thus Mendip admits it wouldn't have considered it except for the Inspector's requirement to find extra housing in the NE. Hence if that requirement is removed, Mendip is free to choose whether or not to approve any proposed application for development on that site based on the usual criteria. It wouldn't be encouraged to do so by LPP2.

(ii) In particular, do the 13 sustainability objectives in the SA represent a realistic summary of the principal sustainability criteria which the Plan should have regard to?

1. The objectives all seem laudable and easy to support. The table in Appendix 4 gives no indication of relative priority. It is assumed that they are **not** listed in order of importance.
2. It is notable that there is no mention of high speed broadband access, especially important to rural communities such as those in Mendip. The importance of this provision has been especially highlighted by the recent Covid-19 crisis and the increasing numbers working from home using tools such as Zoom. While Rode has benefited from fibre to the cabinet

(FTC) the local copper distribution network is patchy and some premises still have slow and unreliable connections. Perhaps this could be added to SA013?

(iii) Are these criteria analysed at an appropriate level of detail and rigour?

1. As spelt out in Table 11 of the SA, SA02 (maintain, enhance distinctive character of settlements) almost all new developments are likely to have at least some negative impact on the distinctive character of long established communities such as those in Mendip villages. The rather bland statement that all the preferred option sites are considered acceptable seems to gloss over some important negative effects and no evidence for the statement is provided.
2. SA07 states that there are no known specific opportunities for renewable energy projects around the district. It is worth noting that the owner of Merfield House (see 4.2 below) has proposed building a mini hydropower scheme using a disused millrace on his land. A scheme at nearby Tellisford also on the River Frome has a 55 kilowatts capacity.
3. SA09 - Encourage more sustainable travel patterns - would definitely not be consistent with more development in Rode. One of the attractions of the village is that it doesn't have a main highway running through the centre. Almost all the village lies within an area bounded by the A36, the A361, the B3109 (Bradford Road) and Rode Hill. Parking is at a premium and the High Street in particular is normally effectively only a single track road because of parked vehicles. This causes major problems at the beginning and end of the school day when a minibus collects and delivers children being swapped between Rode and Norton St Philip schools, effectively blocking the High Street.
4. Campaigners in the village have worked tirelessly with the bus companies to maintain some semblance of a service. Two companies, First Bus and Faresaver have been providing services to and from neighbouring towns. But these are sparse with many gaps in the timetable and cancellations are not uncommon. Recently Faresaver withdrew its X67 service from Rode into Bath. Rode is a significant diversion from the direct route from Frome into Bath and buses find negotiating the narrow streets difficult. All this makes commuting out of the village to the main centres of employment on public transport inadequate and unreliable.

5. Despite Rode being designated a Primary Village, the consequence is that any medium to large scale housing development in the village would create significantly more private car journeys. The main centres of employment are Frome, Trowbridge, Bath and beyond. Commuting to London is not unknown. The surrounding highways are already heavily used, not least the A36 into Bath. This cannot be described as a sustainable travel pattern.

(iv) Does the SA provide a sufficient level of detail in the treatment of realistic alternatives in the north-east of the District?

1. This has not been closely examined given our central case that further development focused on the north-east is not required.

(v) Is the Habitats Regulation Assessment (HRA) Addendum (January 2020), ie in relation to the 505 additional dwellings in the north-east of the District, robust?

1. Again this has not been examined in detail as our case remains that there is no established requirement for an extra 505 dwellings in the north-east.