

Proposed Submission South Somerset Local Plan 2006 – 2028

Analysis of Consultation Responses to the Further Main Modifications

1. Introduction

- 1.1. This report provides an analysis of the consultation responses to the further Main Modifications to the Proposed Submission South Somerset Local Plan 2006-2028.
- 1.2. This report sets out the following:
 - Background and context to the Local Plan making process and the consultation process;
 - Key issues raised by consultees in relation to the Main Modifications;
 - An analysis of these key issues, documenting South Somerset District Council's response;
 - A conclusion on whether the key issues raised prompt a change to the Local Plan policies set out in the Main Modifications; and
 - Next steps and recommendations for Project Management Board to endorse.

2. Background

- 2.1. The Proposed Submission South Somerset Local Plan 2006-2028 was subject to resumed Examination Hearing Sessions between the 10 and 13 June 2014. These Hearing Sessions debated the initial Main Modifications and provided an opportunity for consultees and stakeholders to challenge the proposed amendments to the Local Plan.
- 2.2. Based upon the conclusions reached during these Hearing Sessions, the Inspector issued a Preliminary Findings letter on 16 July 2014.
- 2.3. The letter identified that there were *“a small number of shortcomings in the document, relating to soundness, which the Council should address through the agreement of Main Modifications (MMs)”*¹. The letter then goes on to set out four further Main Modifications.
- 2.4. The further Main Modifications have been produced to satisfy these specific concerns, and were approved for public consultation by District Executive on the 7 August 2014 and Full Council on the 21 August 2014. The further Main Modifications have since been subject to consultation between 28 August 2014 and 10 October 2014.
- 2.5. The Council has sought to discharge its duties under Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), and its own Statement of Community Involvement², by making the Proposed Main Modifications available to both specific consultation bodies and general consultation bodies.

¹ Inspector's Preliminary Findings following the Resumed Hearing Sessions (July 2014): https://www.southsomerset.gov.uk/media/674198/inspector_s_preliminary_findings_post_resumed_examination_hearing.pdf

² South Somerset District Council: Statement of Community Involvement, Appendix 2 (July, 2007)

2.6. The Council has also discharged the “Duty to Co-operate” as prescribed under Regulation 4 of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), by actively engaging with the “Prescribed Bodies”³. Only a limited number of comments have been received from these Bodies during the consultation process, and the comments received do not result in any changes to the Main Modifications.

3. Summary of Consultation Responses

3.1. In total 54 respondents provided 101 comments to the public consultation. A breakdown of the number of comments received against each of the further Main Modification is set out in Table 3.1 below.

Table 3.1: Number of Comments Received for each Main Modification

Main Modification	Support	Object	Observation	Total
Introduction	2	6	3	11
MM9	3	30	2	35
MM10	4	35	0	39
MM11	1	3	1	5
MM12	2	7	2	11
Next Steps	0	0	0	0
Total	12	81	8	101

3.2. All of the consultation responses received have been reviewed and considered. Analysis of the consultation responses has highlighted a number of main issues. The Council’s analysis and response to these main issues is set out in Section 4 below.

³ A detailed account of the Duty to Co-operate process can be found here: https://www.southsomerset.gov.uk/media/648421/duty_to_cooperate_report_proposed_main_modifications_update_march_2014.pdf.

4. Analysis of Consultation Responses

Introduction and Background

4.1. Introduction

4.1.1. A number of comments have been made in relation to the overall Local Plan-making process. Whilst not strictly relevant to the Main Modifications, the comments have been attributed to the 'Introduction and Background' section of the document as they do not appropriately fit with any of the specific Main Modifications.

4.2. Analysis of the Main Issues and the Council's Response

4.2.1. There were 11 comments made in relation to the Introduction and Background, 2 comments were in support, 6 in objection, and 3 observations. The following main issues were identified and the Council's response is noted alongside each comment:

Main Issue	South Somerset District Council Response
Object to building on Grade 1 agricultural land.	This issue is not specifically relevant to the Main Modifications consultation. This issue has been discussed and addressed through the resumed Examination Hearing Sessions and through the Sustainability Appraisal of growth options. Recommendation: No change
Object to development at Keyford due to traffic impact.	This issue is not specifically relevant to the Main Modifications consultation. This issue has been discussed and addressed through resumed Examination Hearing Sessions. Recommendation: No change
East Coker should be defined as a Rural Centre and more development should be allowed here.	This issue is not specifically relevant to the Main Modifications consultation. The settlement hierarchy has been debated through the Examination Hearing Sessions and has not been questioned by the Inspector in terms of soundness of the Local Plan. Recommendation: No change
The policy for controlling development in Rural Settlements is too restrictive.	
The North East Yeovil sustainable urban extension suffers from anthrax contamination.	This issue is not specifically relevant to the Main Modifications consultation. This issue has been discussed and addressed through the Proposed Main Modifications and resumed Examination hearing sessions. Recommendation: No change

4.3. Conclusion for Introduction and Background

4.3.1. The comments do not result in changes to the Main Modifications. It is also noteworthy that comments have been received from Natural England (who are satisfied with the HRA addendum report), and the Environment Agency (who reiterate the plan is sound and Policy EQ1 ensures flood risk issues will be addressed).

4.4. Recommendation for Introduction and Background

4.4.1. That Project Management Board endorses the Introduction and Background text.

Main Modification 9: Policy YV2 – The inclusion of detail on landscape mitigation measures at the North East Yeovil SUE

4.5. Introduction

- 4.5.1. During the Hearing Sessions the Inspector noted that a planning application had already been submitted for the North East Yeovil Sustainable Urban Extension. The Inspector requested that additional text be added to Policy YV2 to provide greater certainty regarding mitigation of the landscape impact stemming from the proposed development.
- 4.5.2. The Council has proposed additional text to ensure that appropriate mitigation is forthcoming through the development management process.
- 4.5.3. Elsewhere within Policy YV2, and in order to be consistent with the approach in Policy SS3: Delivering New Employment Land, a consequential amendment made to refer to land for economic development in general, rather than ‘B’ use land specifically.

4.6. Analysis of the Main Issues and the Council’s Response

- 4.6.1. There were 35 responses made in relation to MM9, 3 in support, 30 in objection, and 2 observations. The following main issues were identified for MM9, the Council’s response is noted alongside each comment:

Main Issue	South Somerset District Council Response
Economic Development	
The amendment gives a much wider and less controlled scope for inappropriate development – a more limited definition of employment use should be included within the policy.	The amendment is required to be consistent with Policy SS3 and to be consistent with the NPPF. This was considered through the original Examination Hearing Sessions in May-June 2013 and debated in the resumed Examination Hearing Sessions in Jun 2014. Recommendation: No change
Landscape	
Landscape mitigation text should also be added to the South Yeovil SUE to limit the skyline dominance of built form, particularly from properties to the south and west, and the potential for visual intrusion as viewed from the southern approach to Yeovil. The Peripheral Landscape Study Addendum indicates landscaping is required for both sustainable urban extensions.	Evidence in the Peripheral Landscape Study indicates that the South Yeovil SUE is located in an area of mostly ‘moderate-high’ capacity to accommodate built development, albeit there is a small area of lower capacity in the north east corner of the site. This evidence indicates that the South Yeovil SUE is less sensitive in terms of landscape impact than the North East SUE, and therefore the inclusion of additional detail on landscape mitigation measures at the South Yeovil SUE is not considered to be justified. The landscape mitigation impacts generated by any development proposal can be resolved through the development management process.
The landscape impact of the South Yeovil SUE would be greater than in the North East due to beautiful rolling hills, the nearby Dorset AONB and historic buildings, yet it does not require landscape mitigation measures. Development on the north east edge will be highly visible. Therefore, landscape	Recommendation – No change.

<p>mitigation text should be added to the South SUE.</p>	
<p>Structural landscaping should also be included to mitigate the visual intrusion from the east of the proposed North East Yeovil SUE, to preserve views from villages in the area.</p>	
<p>The landscape impact of developing the North East Yeovil SUE cannot be mitigated due to the slope and views from the Somerset Levels, Cadbury Castle and Dorset Hills.</p>	<p>The justification for proposing the North East Yeovil SUE is set out in the Proposed Main Modifications and resumed Examination hearing sessions. It is considered that mitigation measures can minimise landscape impact.</p> <p>Recommendation: No change</p>
<p>Support the text on landscape mitigation, but this should be simplified to read “landscape mitigation, to address (i) potential massing impacts across the site’s northward face, and (ii) potential visual intrusion at the site’s edge and skyline”. Supporting text should also be added.</p>	<p>Noted and agree with simplification of text.</p> <p>Recommendation –Amend Policy YV2 by deleting the draft sixth bullet point relating to landscape mitigation for the North East Yeovil sustainable Urban Extension and replace with the following bullet point criteria:</p> <ul style="list-style-type: none"> • <u>Landscape mitigation to address:</u> <ul style="list-style-type: none"> ○ <u>Potential massing effects across the site’s northward face; and</u> ○ <u>Potential visual dominance at the site’s edge and skyline.</u>
<p>Other</p>	
<p>Badgers are present in the location of the North East Yeovil SUE, and a corridor should be included to protect wildlife from new development.</p>	<p>This issue is not specifically relevant to the Main Modifications consultation. The policy context as set out in the NPPF and Local Plan Policy EQ4 will ensure that impacts upon wildlife are adequately addressed through the development management process.</p> <p>Recommendation: No change</p>
<p>The North East SUE conflicts with the Mudford Neighbourhood Plan, and therefore contravenes Government policy on “localism”.</p>	<p>Mudford does not have a formally recognised Neighbourhood Plan, agreed with the Local Planning Authority.</p> <p>The decision to identify a North East SUE is evidence-based and has been examined thoroughly through the Examination Hearing Sessions.</p> <p>Recommendation: No change</p>
<p>Concerned about water run-off from the NE Yeovil SUE causing flooding downstream at Mudford and other villages. Surface water containment will be ineffective when there is non-stop rain like last winter.</p>	<p>This issue is not specifically relevant to the Main Modifications consultation. This issue has been discussed and addressed the Examination Hearing Sessions. The policy context provided by the NPPF and Policy EQ1 provide will ensure that flood risk is adequately addressed through the development management process.</p> <p>Recommendation: No change</p>
<p>At the NE Yeovil SUE, there should be provision for cricket and tennis, and the football pitch should be full sized.</p>	<p>This issue is not specifically relevant to the Main Modifications consultation. The context provided by the NPPF and Policy HW1 will address this issue, which will be considered in more detail through the development management process.</p>

	Recommendation: No change
Housing and employment figures should be expressed as “up to”, as the word “approximately” indicates a potential greater take up of land.	This issue is not specifically relevant to the Main Modifications consultation. The justification for the SUEs was set out through the Proposed Main Modifications and resumed Examination hearing sessions. The inclusion of the words “up to” would be contrary to Policies SS3 and SS5.
	Recommendation: No change

4.7. **Conclusion for Main Modification 9**

- 4.7.1. To assist in the implementation of Policy YV2 a small amendment is proposed to simplify the landscape mitigation wording for the North East Yeovil Sustainable Urban Extension.

4.8. **Recommendation for Main Modification 9**

- 4.8.1. That Project Management Board endorses the decision to simplify the text in Policy YV2.

Main Modification 10: Policy YV3 – Deletion of the East Coker and North Coker buffer zone

4.9. Introduction

- 4.9.1. The intention of the buffer zone set out in Policy YV3 was to preserve the character of North Coker and East Coker, and prevent coalescence with Yeovil. However, at the Local Plan Examination Hearing Session for Issue 3, the Inspector raised concerns regarding the continued justification for the buffer zone in light of the reduced scale and extent of the South Yeovil SUE.
- 4.9.2. The Council also notes how the recent Planning Practice Guidance (Paragraph: 015 Reference ID: 37-015-20140306) re-iterates Paragraph 77 of the National Planning Policy Framework in that Local Green Space designations should only be used where the green area concerned is not an extensive tract of land, and that the blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a ‘back door’ way to try to achieve what would amount to a new area of Green Belt by another name.
- 4.9.3. Therefore, the Council is proposing to delete the East Coker and North Coker Buffer Zone from the Local Plan. This involves a further Main Modification to delete Policy YV3 as set out in the table below; plus additional modifications to delete references to the buffer zone in the supporting text (paragraphs 5.34 and 5.50 – 5.54 of the Local Plan) and removing the buffer zone from Yeovil Inset Map 15

4.10. Analysis of the Main Issues and the Council’s Response

- 4.10.1. There were 39 comments made in relation to MM10, 4 in support, 35 objections and 0 observations. The following main issues were identified for MM10, the Council’s response is noted alongside each comment:

Main Issue	South Somerset District Council Response
Support the deletion of Policy YV3 as the smaller scale urban extension will not lead to coalescence with North and East Coker, and will not harm the character and historic environment. Retaining the policy would be contrary to the NPPF para 77 and Planning Practice Guidance.	Support noted. Recommendation: No change
Object to the deletion of the buffer zone as there is a need to protect the wealth of heritage assets in the area (there are 89 listed heritage assets in East Coker parish).	Heritage assets will be adequately conserved and enhanced through the NPPF and Policy EQ3. There is a lack of justification for the buffer zone in light of the reduced scale and extent of the South Yeovil SUE, and it is no longer considered to be consistent with national policy (NPPF para 76, 77) and guidance (PPG Ref ID 37-015-20140306). Recommendation: No change
Object to the deletion of the buffer zone as it is needed to protect East Coker from future development. The Council’s Five Year Housing Land Supply paper (June 2014) and Strategic Housing Land Availability Assessment (SHLAA) indicate	There is a lack of justification for the buffer zone in light of the reduced scale and extent of the South Yeovil SUE, and it is no longer considered to be consistent with national policy (NPPF para 76, 77) and guidance (PPG Ref ID 37-015-20140306). The Strategic Housing Land Availability Assessment is a technical document providing an appraisal of potential

<p>further sites will be developed to the south of Yeovil towards East/North Coker.</p>	<p>sites. It does not serve to allocate these sites or grant them planning permission, and each will be required to demonstrate they can achieve sustainable development and mitigate their impacts before receiving planning permission.</p> <p>The Five Year Housing Land Supply is also a technical document, providing an account of sites that can be shown to be deliverable within the next five years. It represents a 'snap-shot' in time and is subject to change and review. Where sites with planning permission are included these have been shown to represent sustainable development and are in accordance with national and local policy.</p> <p>Recommendation: No change</p>
<p>The buffer zone should be increased to the edge of the South Yeovil SUE to protect the area from development, due to the impact upon wildlife and archaeology.</p>	<p>Wildlife and archaeological impacts have been discussed and addressed through the Proposed Main Modifications and resumed Examination hearing sessions. There is a lack of justification for the buffer zone in light of the reduced scale and extent of the South Yeovil SUE, and it is no longer considered to be consistent with national policy (NPPF para 76, 77) and guidance (PPG Ref ID 37-015-20140306).</p> <p>Recommendation: No change</p>
<p>The buffer zone should be increased to cover the whole of the Keyford area as the housing proposals are based upon outdated ONS data and therefore not required.</p>	<p>The scale of housing is not specifically relevant to the Main Modifications consultation. This topic was discussed and addressed through the Proposed Main Modifications and resumed Examination Hearing Sessions.</p> <p>Recommendation: No change</p>
<p>Policy YV3 should be amended to establish a new Green Belt, extending through the Coker vale to the border with Dorset, and set an appropriate policy for development of settlements within the Green Belt. This is required to protect the preserve heritage assets, landscape and high quality agricultural land.</p>	<p>The establishment of Green Belt to the south of Yeovil is not considered to be justified, effective or consistent with national policy (NPPF para 182). New Green Belt should only be established in exceptional circumstances (NPPF para 82) – it is not considered that these circumstances apply to the south of Yeovil.</p> <p>There is a lack of justification for the buffer zone in light of the reduced scale and extent of the South Yeovil SUE, and it is no longer considered to be consistent with national policy (NPPF para 76, 77) and guidance (PPG Ref ID 37-015-20140306).</p> <p>Recommendation: No change</p>

4.11. Conclusion for Main Modification 10

4.11.1. Whilst there are a number of consultation responses requesting that the Buffer Zone is re-instated, there is no evidential basis for creating a buffer zone. The proposal would be contrary to the advice within the National Planning Practice Guidance and would not be justified. The Main Modification to delete the Buffer Zone will remain as currently written.

4.12. Recommendation for Main Modification 10

4.12.1. That PMB endorse Main Modification 10 and the deletion of Policy YV3.

Main Modification 11: Policy SS3, Table 1 and supporting text – Deletion of a specific employment land figure for rural settlements, with the inclusion of an explanation of the Council’s approach to such proposals in these settlements

4.13. Introduction

- 4.13.1. During the Examination Hearing Session on employment land and economic growth the Inspector request clarification of the Council’s approach to facilitating growth in ‘Rural Settlements’.
- 4.13.2. Having analysed the Council’s further evidence and justification, the Inspector wrote to the Council on the 14 July 2014 stating that “*the situation remains unclear*” and was not sound⁴. However, in so doing, the Inspector also provided the Council with a solution and recommended that this be put forward as a Main Modification.
- 4.13.3. The proposed solution was to remove specific reference to an amount of employment land that should be delivered, and instead utilise the policy framework provided by the NPPF and Local Plan policies SS2, EP4, and EP5.
- 4.13.4. An additional component of MM11 relates to a text change required to give greater clarity for applicants and decision makers. This change makes it clear that economic development in Rural Centres needs to be adjacent to the existing development area of the settlement.
- 4.13.5. A minor modification has also been made to Policy SS3 to ensure there is a footnote link to the proposed early review of the policy framework for delivering growth in Wincanton. This is as a consequence of the more detailed changes set out under Main Modification 12.

4.14. Analysis of the Main Issues and the Council’s Response

- 4.14.1. There were 5 comments made in relation to MM11, 1 in support, 3 objections and 1 observation. None of these comments make specific reference to the issues raised by the Inspector relating to economic growth in the Rural Settlements, and they do not directly address the Main Modification. However, for completeness, the issues raised have been summarised and the Council’s response is noted alongside each comment:

Main Issue	South Somerset District Council Response
Employment land in Crewkerne	
Approach to Crewkerne is unclear and will allow growth that is inconsistent with the strategic approach set out in the Local Plan (Policies EP1 and HG1). MM11 should cross refer to Policy EP1.	<p>This issue is not specifically relevant to MM11.</p> <p>In any effect, the Local Plan, through Policy SS3, Policy SS5, Policy EP1, and Policy HG1 does provide the policy framework through which to make decisions on future growth in Crewkerne. Policy SS3 includes a footnote reference to its relationship with Policy EP1.</p> <p>Recommendation: No change</p>
Employment allocation at Wincanton	
It was agreed with the inspector, that the initial area of employment would be the two areas of land on each side of the Lawrence Hill	<p>This issue is not specifically relevant to MM11.</p> <p>The Inspector did not discuss the specific boundary or area of employment land within Wincanton. The</p>

⁴ Note to Council from Inspector – Policy SS3: Delivering New Employment Land – Rural Settlements 14 July 2014); https://www.southsomerset.gov.uk/media/674195/inspector_s_final_note_to_council_on_rural_employment_july_2014.pdf

<p>Road, from the Long Close site to the Anchor Hill roundabout. The land specified was between Lawrence Hill and the A303, and between Lawrence Hill and the stream to the north, which would form the buffer between employment and existing residential.</p>	<p>proposed Direction of Growth set out in Policy PMT4 sets out the broad extent of the employment area. This will help facilitate the employment growth advocated in Policy SS3.</p> <p>Recommendation: No change</p>
<p>The employment land provision at Wincanton should be increased to 6 hectares.</p>	<p>This issue is not specifically relevant to MM11.</p> <p>Main Modification 4 (March 2014) sets out the justification and evidence for the amount of employment land in Wincanton. This was debated during the Examination Hearing Sessions in June 2014 and has not been raised again as a matter of soundness by the Inspector.</p> <p>Recommendation: No change</p>

4.15. Conclusion for Main Modification 11

- 4.15.1. The comments received do not give rise to any amendments to the Main Modification. The revision to Policy SS3 is in accordance with the solution suggested by the Inspector to make the policy sound.

4.16. Recommendation for Main Modification 11

- 4.16.1. That PMB endorse Main Modification 11 and the amendment to Policy SS3.

Main Modification 12: Policy SS5 and supporting text – Amendment to improve clarity regarding housing delivery in Crewkerne and Wincanton and reference in an appropriate section of the LP to an early review of housing and employment provision at Wincanton

4.17. Introduction

- 4.17.1. At the Local Plan Examination Hearing Session for Issues 6 and 7, the Inspector sought greater clarity on how applications for residential development and overall housing growth will be managed in the Market Towns of Crewkerne and Wincanton.
- 4.17.2. The Council recognises that given Crewkerne does not have an identified ‘Direction of Growth’ and that Wincanton’s ‘Direction of Growth’ is only for economic development there is the need to be more definite on how applications for residential development will be considered. Main Modification 12 is intended to the improve clarity for both the development industry and the local community..
- 4.17.3. It is also proposed to amend Policy SS5 (as has been done in SS3) to refer to ‘Development Areas’ at Rural Centres, as this gives greater clarity for applicants and decision makers, by making it explicitly clear that development in Rural Centres needs to be well related to the existing built settlement.
- 4.17.4. In his Preliminary Findings letter of 16 July 2014, the Inspector requested that the Council provide a stronger commitment to an early review of the policy framework for delivering housing and employment in Wincanton. It is therefore proposed that a specific reference to this early review is included in the Implementation and Monitoring chapter of the Local Plan and a footnote be added to both Policies SS3 and SS5 to highlight the Council’s intention to carry out this early review of housing and employment policy for Wincanton.

4.18. Analysis of the Main Issues and the Council’s Response

- 4.18.1. There were 11 comments made in relation to MM12, 2 in support, 7 objections and 2 observations. The following key issues were identified for MM12 the Council’s response is noted alongside each comment:

Main Issue	South Somerset District Council Response
Growth Adjacent the Development Area at Crewkerne and Wincanton	
<p>The effect of this modification as currently worded is for a period of time, to allow unbounded growth around the Market Towns of Wincanton and Crewkerne which will include land of high environmental value.</p>	<p>The revision to Policy SS5 provides an NPPF compliant approach to dealing with planning applications for housing growth until such time as the Site Allocations DPD is adopted and/or there is an early review of growth proposals in Wincanton.</p> <p>Decisions on growth will be taken in light of the policy framework provided by SS5 and other policies within the Local Plan (e.g. SD1, SS1, HG1, etc). It is not correct to state that this growth will be unbounded as future planning proposals will need demonstrate they are commensurate with the scale of growth set out in SS5, will not have a significant negative impact on the role and function of the settlement, and can achieve sustainable development in line with the policy principles set out in the NPPF.</p> <p>In accordance with paragraph 14 of the NPPF where a proposal would result in any adverse impacts that would</p>

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	<p>significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole it should be refused.</p> <p>Recommendation: No change</p>
Growth Adjacent the Development Area – Crewkerne	
<p>The CLR Key Site (Policy HG1) is proposed to meet the housing need over the plan period, so promoting development that is outside of this area is inconsistent with the Local Plan policy for strategic growth proposed for this town.</p>	<p>Policy SS5 identifies an additional housing requirement of <u>at least</u> 45 dwellings in Crewkerne over the plan period. This is in addition to the saved CLR Key Site allocation (Policy HG1).</p> <p>As such, and to ensure compliance with the NPPF, it is appropriate that Policy SS5 (through MM12) allows for planning applications to be submitted and considered to meet the housing requirement in Crewkerne. This is not an inconsistent approach, nor should it result in over-development, as future application(s) will still need to be in accordance with the Local Plan, overcome any significant negative impacts, and meet the policy tests for sustainable development as set out in the NPPF.</p> <p>Recommendation: No change</p>
<p>The proposed approach moves the emphasis away from the delivery of the Key Site. Main Modification should be amended as follows:</p> <p>The same key considerations should also apply when considering housing proposals <u>in Crewkerne including the strategic housing site, Wincanton and (wherever located) adjacent to the development area at Crewkerne, Wincanton and the Rural Centres.</u></p>	<p>The Main Modification has been put forward to improve the clarity for how planning applications can be considered within Crewkerne to help realise the levels of growth set out in Policy SS5.</p> <p>The Local Plan, which should be read as a whole, has clear reference to Council’s stated ambition to deliver the Crewkerne Key Site, especially through policies EP1 and HG1.</p> <p>Recommendation: No change</p>
Growth Adjacent the Development Area – Wincanton	
<p>The wording should limit housing development to brownfield land within the existing town’s development boundaries. Failure to define the limitations on housing provision would make the work on a sustainable policy pointless and contrary to the NPPF.</p>	<p>The approach set out in MM12 accords with that discussed with the Inspector at the Examination hearing sessions held in June 2014. The principle of development within the Development Area of Wincanton will continue to be supported but to limit growth to within that area alone would be contrary to the NPPF. As stated above development proposals will be considered in the context of the presumption in favour of sustainable development, overall scale of growth and wider policy framework set out in the Local Plan.</p> <p>Recommendation: No change</p>
<p>The text should be amended to confirm that the permissive approach to housing proposals extends to Wincanton.</p>	<p>The Main Modifications have been drafted to specifically ensure that the permissive approach applies in Wincanton.</p> <p>Recommendation: No change</p>
Early Review at Wincanton	
<p>The proposed timeframe of commencement within two years and completion in five years for</p>	<p>On the matter of reviewing local plans, the NPPG states the following:</p>

<p>the early review of housing and employment policy at Wincanton is unjustifiably long.</p> <p>Suggested that commencement within one year and completion with 3 years might be appropriate.</p>	<p><i>“local planning authority should review the relevance of the Local Plan at regular intervals to assess whether some or all of it may need updating. Most Local Plans are likely to require updating in whole or in part at least every five years. Reviews should be proportionate to the issues in hand. Local Plans may be found sound conditional upon a review in whole or in part within five years of the date of adoption.”</i> Paragraph: 008 Reference ID: 12-008-20140306</p>
<p>Concerned regarding the proposal to undertake the housing review as part of the Site Allocations DPD process. In the event that this review concludes that more homes and therefore sites are needed, there is insufficient time to include further sites to accommodate this need within the Site Allocations Document. This will result in further uncertainty and delay to housing provision within Wincanton.</p>	<p>The review of housing and employment policy at Wincanton is a potentially complex issue and is likely to give rise to further revisions of policy elsewhere within the Local Plan. A period of assimilation and monitoring is required in order to reflect on how the existing policy is translating into built development, and to ensure that there is a robust evidence base to underpin any future growth proposals.</p> <p>In the light of the advice in the NPPG it is accepted that to be considered genuinely ‘early’ the proposed review of the situation in Wincanton could be completed within a shorter timescale. It is therefore proposed that Policy SS5 and the proposed new paragraph after Section 13.5 of the Local Plan be amended to state a review will be completed within three years of the date of adoption of the Local Plan.</p> <p>Recommendation: Amend Policy SS5 and new paragraph after Section 13.5 of the Local Plan as follows:</p> <p><i>“The Council will undertake an early review of Local Plan policy, in accordance with the statutory requirements, relating to housing and employment delivery provision in Wincanton. This will be undertaken as part of the proposed Site Allocations Development Plan Document process; this will commence within two years, with the objective that the review will be completed within five three years of the date of adoption of the Local Plan.”</i></p>
<p>Other</p>	
<p>Re-definition of the current Strategic Direction of growth for Employment at Wincanton as mixed-use.</p>	<p>This issue was addressed during the Examination Hearing sessions of June 2014.</p>
<p>Please include a "Preferred area for housing growth" in the Wincanton element of the plan. The preferred area of housing growth should be the area adjacent New Barns Farm between Lawrence Hill and West Hill and the area between Common Road and Devonish Lane.</p>	<p>Wincanton has a high level of existing planning permissions for sites which are expected to be built out over the Local Plan period. The Main Modifications facilitate other planning applications being considered on their merits.</p> <p>The early review of housing and employment in Wincanton will provide the appropriate opportunity to examine monitoring data on housing and employment delivery, appraise the scale of future need, and identify locations for growth in Wincanton.</p> <p>Recommendation: No change.</p>
<p>Wincanton should have a 5 year moratorium from any large scale</p>	<p>A moratorium would be contrary to Paragraph 14 of the NPPF. In practice, it would also be unachievable and</p>

<p>new housing following the allocation being front loaded in the first half of the plan period.</p>	<p>unenforceable in light of the presumption in favour of sustainable development. Recommendation: No change.</p>
<p>Policy SS5 is in direct conflict with national housing policy. No policy exists within the Main Modifications that complies with NPPF directives, NPPG interpretation, the Localism Act 2011 or any ministerial and central Government promotion encouraging individual Custom Build solutions to the housing shortage. As such there is no means of utilising any portion of the thirty million pounds grant subsidy that has been made available to those wishing to build their own accommodation.</p>	<p>This is not specifically relevant to MM12. The Local Plan does not prevent proposals for Custom Build housing solutions coming forward. Any Custom Build scheme will need to demonstrate that it represents sustainable development and is in accordance with national and local policy. The Homes and Communities Agency are responsible for the funding for Custom Build. Grant will be given to projects which meet their criteria. Recommendation: No change.</p>

4.19. Conclusion for Main Modification 12

- 4.19.1. In considering the notion of an ‘early review’ it is important to recognise that the process is complex. Legislative and statutory requirements, such as public consultation periods, the carrying out of a Sustainability Appraisal, and ensuring corporate sign-off all have an impact on the timeframe for delivery. Any timetable for undertaking an early review needs to be realistic so that policies can be developed robustly and comply with the NPPF requirements to be evidence-based, justified and effective.
- 4.19.2. That being said, it is the Council’s objective to bring about an early review of the policy approach in Wincanton. Recent examples from other Councils who have committed to an early review indicate that this process should take place in advance of the five-year period set out in the NPPG. Therefore, it is proposed that timescale is revised, so that the early review is achieved within three years of the date of adoption of the Local Plan.
- 4.19.3. The NPPG advises that Local Plan reviews can be carried out *“in whole or in part”*. It is suggested that the early review for South Somerset would take the form of a review in part. This will be carried out in accordance with the relevant statutory requirements.

4.20. Recommendation for Main Modification 12

- 4.20.1. That Project Management Board endorse the decision to amend MM12 in relation to both Chapter 13 – Implementation and Monitoring and Policy SS5 to state:

“The Council will undertake an early review of Local Plan policy relating to housing and employment delivery provision in Wincanton. This will be in accordance with statutory requirements and be undertaken as part of the proposed Site Allocations Development Plan Document process; this will commence within two years, with the objective that the review will be completed within five three years of the date of adoption of the Local Plan.”

5. Recommendations and Next Steps

5.1. The Project Management Board is asked to consider the following recommendations:

1. To endorse the amendments to the further Main Modifications and recommend that these progress to District Executive and Full Council for further sign-off; and
2. To delegate final editing of text for submission to the Project Management Board and Associate Director for Economy and Principal Spatial Planner.

5.2. The Main Modifications will be considered by both District Executive and Full Council on the 6 November 2014. Should they be approved, they will be submitted (along with supporting documentation) to the Inspector on the 7 November 2014.

5.3. Based upon the feedback at the recent Examination Hearing Sessions and further correspondence with the Inspector it is anticipated that a draft “Inspector’s Report” will be issued to the Council by the end of 2014. This draft will be subject to a ‘fact-checking’ exercise, before being finalised.

5.4. Once in receipt of the final Inspector’s Report all necessary changes to the Local Plan will be made and submitted to the Council for adoption. The Local Plan must be ratified by a meeting of Full Council in order to be formally adopted. Under the current timetable this is anticipated to occur in early 2015.