

The Council's Vision:

To enable people to live, work and prosper in West Somerset

LOCAL DEVELOPMENT PANEL

Meeting to be held on Thursday 14 November 2013 at 2.30 pm

Council Chamber, Williton

AGENDA

1. Apologies for Absence

2. Minutes

Minutes of the Local Development Panel held on 12 June 2013, to be approved and signed as a correct record – **SEE ATTACHED.**

3. Declarations of Interest

To receive and record any declarations of interest in respect of any matters included on the Agenda for consideration at this Meeting.

4. Public Participation

The Chairman to advise the Committee of any Agenda items on which members of the public have requested to speak and advise those members of the public present of the details of the Council's public participation scheme.

5. Responses to the Revised Preferred Strategy for the West Somerset Local Plan to 2032 Consultation

To consider the Report No. WSC 147/13, to be presented by Principal Planning Officer (Policy) – **SEE ATTACHED.**

The purpose of the report is to set out the main issues raised in the responses and to recommend further work necessary to prepare a sound Local Plan for formal publication and submission; also to provide a summary of all the responses to the consultation exercise.

6. Update on Production of Design Guide and Major Developments SPD

To consider the Report No. WSC 146/13, to be presented by the Planning Manager – **SEE ATTACHED.**

The purpose of the report is to provide Members with an opportunity to comment on and inform the working draft of the Design Guide and Major Developments SPD.

COUNCILLORS ARE REMINDED TO CHECK THEIR POST TRAYS

The Council's Vision:

To enable people to live, work and prosper in West Somerset

The Council's Corporate Priorities:

- Local Democracy:
Securing local democracy and accountability in West Somerset, based in West Somerset, elected by the people of West Somerset and responsible to the people of West Somerset.
- New Nuclear Development at Hinkley Point
Maximising opportunities for West Somerset communities and businesses to benefit from the development whilst protecting local communities and the environment.

The Council's Core Values:

- Integrity
- Respect
- Fairness
- Trust

LOCAL DEVELOPMENT PANEL**Minutes of the Meeting held on 12 June 2013****Present:**

Councillor K H Turner (Chairman)
Councillor A F Knight
Councillor K J Ross
Councillor A H Trollope-Bellew

Councillor B Heywood
Councillor I R Melhuish
Councillor M A Smith

Members in Attendance:

Councillor M O A Dewdney
Councillor E May

Councillor A P Hadley

Officers in Attendance:

Martin Wilsher, Principal Planning Officer (Policy)
Toby Clempson, Principal Planning Officer (Policy)
Ian Timms, Corporate Manager Housing, Welfare and Economy
Andrew Goodchild, Planning Manager
Krystyna Kowalewska, Meeting Administrator

LD1 Apologies for Absence

No apologies for absence were received.

LD2 Minutes

(Minutes of the Local Development Panel held on 11 April 2013 – circulated with the Agenda).

RESOLVED that, subject to deleting Councillor A F Knight from the list of Panel Members present and amending Councillor A H Trollope-Bellew's description of interest to read Somerset County Council in Minute No. LD17, the Minutes of the Meeting of the Local Development Panel held on 11 April 2013 be confirmed as a correct record.

LD3 Declarations of Interest

Members present at the meeting declared the following personal interests in their capacity as a Member of a County, Parish or Town Council:

Name	Minute No	Description of Interest	Personal or Prejudicial	Action Taken
Cllr K H Turner	All Items	Brompton Ralph	Personal	Spoke and Voted
Cllr K J Ross	All Items	Dulverton	Personal	Spoke and Voted

LD4 Public Participation

Item 6 - Draft West Somerset Local Plan to 2032 – Proposed New and Amended Policies in Response to the New Requirements of the National Planning Policy Framework

Julian Spicer, Chairman of Stogumber Parish Council thanked the Principal Planning Officers (Policy) for their response to the feedback and amendments given by the parish council to the consultation as many of the parish council concerns had been addressed.

He raised further concerns regarding the following:

- Policy SC1, point 2 concerning limited development in the primary villages - more understanding was needed as to what criteria would be considered for meeting a 'clearly identified local need'; and suggested that it should not be limited to affordable housing.
- Policy SC1, point 5E – it was not clear as to whether the development itself or the occupants of the development should enhance the service and social facility provision of the settlement.
- Policy NH2 – reference to the Brendon Hills had been chosen as notably requiring landscape character protection and the parish council was concerned that the corridor between the AONB and the ENP could be vulnerable to development, therefore a request was made to identify Quantock Vale as a particularly special area.

LD5 Identifying the Full Objectively Assessed Housing Need for the Area – Evidence Review Update

The Principal Planning Officer (Policy), Martin Wilsher, verbally updated Members on the final version of the revised Northern Peninsula Strategic Housing Market Assessment for West Somerset.

The Principal Planning Officer (Policy), Martin Wilsher provided a verbal update on the consultant's first draft of the Hinkley Point impact on housing which formed part of the Strategic Housing Market Assessment. He advised that it was still work in progress and at the moment there was a lot of uncertainty surrounding it. In trying to access future housing requirements for the Hinkley project the consultant was unable to be precise as to what the anticipated level of demand would be. It had been indicated that although campus accommodation would be provided this would not cover all the potential accommodation that was likely to be required by workers on the project. In terms of tourist accommodation there was a difficulty in estimating capacity and availability of surplus space as it was subject to a number of variables, e.g. the weather and the current economic conditions. Issues surrounding vacant properties; where workers would reside and the type of accommodation they would be seeking; and the availability/shortage of housing were also highlighted. The Officer confirmed that notional figures and a final draft of the report was anticipated to be received shortly.

During the discussion, the following specific issues were raised:

- It was presently difficult to get an understanding of the private housing market situation and how to project that forward over the full timescale of the Hinkley project.
- Investigate internally by looking at council tax returns as to what the vacancy rates were likely to be.
- Until the project started the preference of where workers would like to live would not be known, however the market was currently being monitored.
- Monitoring and managing the impact on Houses in Multiple Occupation.
- The housing fund (secured through section 106 monies) would be available to help mitigate the effects of the housing market to ensure local people had access to housing locally once the project started.
- The Housing Enabling team's role was to plan in advance to deal with any issues that could potentially arise.

LD6 Draft West Somerset Local Plan to 2032 – Proposed New and Amended Policies in Response to the New Requirements of the National Planning Policy Framework

(Report No. WSC 66/13, circulated with the Agenda.)

The purpose of the report was to facilitate recommendations to Full Council regarding the publication for consultation of proposed, amended and additional draft Local Plan policies, mainly in response to the new requirements of the National Planning Policy Framework (NPPF). This would enable the Council to proceed towards the publication and adoption of a National Planning Policy Framework-compliant Local Plan.

The report was presented in detail by the Principal Planning Officer (Policy), Toby Clempson, who advised that the complementary policy amendments contained in the report were required as part of the NPPF, and was a follow up to the key strategic site proposals report considered at the April meeting of the Local Development Panel. He drew Members' attention to the main reasons for the proposed policy changes and to the table (paragraph 5.4 of the report) which listed the amended policies as well as the proposed new policies.

Officers noted a number of amendments to the introduction which would be dealt with at a later stage, and confirmed that the typographical errors highlighted by Members would be corrected.

The following proposals to the amended and new policies were made:

- Policy SC2A should include a definition of the term 'average annualised rate'.
- Policy SV1 Assumptions paragraph first line 'can help' should be replaced with 'is necessary'.

During discussion on the policy subjects, the following main points were raised:

- In response to whether a stipulation could be incorporated within Policy SD1 stating that developments should have a southerly aspect to enable PV panels to be built in the roof, it was confirmed that this could be addressed as part of the work being carried out by the Planning Manager on design policy.
- It was envisaged that there would be cross subsidy development with a mixture of affordable and open market housing
- SC1, point 5 'within 50 m' – Members were concerned that this could be misinterpreted and officers advised that they were happy to receive further alternative suggestions on how to deal with this matter and would modify the policy accordingly as part of the consultation process. It was noted that the development should work in the context of the village and the character of the settlement rather than the precise distance.
- Officers reported that they found it difficult to find a definition of a 'built up area'.
- Following concerns as to why certain villages/settlements were not included in either the primary or secondary village category, it was explained that they were treated as being in the open countryside on the basis they did not have enough facilities to meet the criteria or had access difficulties, and this in turn helped to deliver a sustainable pattern of development.
- Open countryside was a planning policy term to mean anywhere with minimal or no service provision.
- It was proposed to do away with the Minehead development limit and development proposals would be considered on the criteria in the policies.
- Development on windfall sites would continue to be important and there would be a need to demonstrate that sites were viable and could be delivered to satisfy the Inspector.
- Changes would be introduced to single bedroom properties following the introduction of the bedroom tax.
- There was felt to have been a lack of advertising in the local area and a different approach was necessary to make the general public more aware of the next stage of consultation. The officers were open to practical suggestions from Members regarding different methods of advertising to facilitate the consultation process.
- Each District Councillor should ensure that their parish/town council was aware of the public consultation, and a request was made to forward to all Members a link to the relevant Council webpage.

Councillor K J Ross proposed the recommendations in the report, subject to the amendments above, which were seconded by Councillor I R Melhuish.

RESOLVED that it be recommended to Council to publish for public consultation the proposed, amended and additional West Somerset District Local Plan to 2032 Preferred Strategy policies set out at Appendix 1 to the report, as amended. The policies set out at Appendix 1 compliment the draft Key Strategic Sites recommended to Full Council by the Local Development Panel of 11 April 2013, and which, subject to resolution of Full Council, will form an integral part of the supplementary consultation.

LD7 Late Item – Extension of Minehead’s Retail Red Line

The Principal Planning Officer (Policy), Martin Wilsher provided a verbal update on representations and concerns raised regarding the primary retail area in Minehead and the properties which would be affected. He reported that the NPPF required the development plan to identify a primary retail area in Minehead and advised that the extent of it could be adjusted on the emerging local plan. Following the consultation process on the preferred strategy a report would be presented to a future meeting of the Local Development Panel for endorsement.

NOTE: Having regard to the special circumstances pertaining in relation to this item the Chairman was of the opinion that, despite its non-inclusion on the agenda, this item should be considered at this meeting for information purposes only.

The meeting closed at 5.02 pm.

RISK SCORING MATRIX

Report writers score risks in reports uses the scoring matrix below

Risk Scoring Matrix

Likelihood	5	Almost Certain	Low (5)	Medium (10)	High (15)	Very High (20)	Very High (25)
	4	Likely	Low (4)	Medium (8)	Medium (12)	High (16)	Very High (20)
	3	Possible	Low (3)	Low (6)	Medium (9)	Medium (12)	High (15)
	2	Unlikely	Low (2)	Low (4)	Low (6)	Medium (8)	Medium (10)
	1	Rare	Low (1)	Low (2)	Low (3)	Low (4)	Low (5)
			1	2	3	4	5
			Negligible	Minor	Moderate	Major	Catastrophic
Impact							

Likelihood of risk occurring	Indicator	Description (chance of occurrence)
1. Very Unlikely	May occur in exceptional circumstances	< 10%
2. Slight	Is unlikely to, but could occur at some time	10 – 25%
3. Feasible	Fairly likely to occur at same time	25 – 50%
4. Likely	Likely to occur within the next 1-2 years, or occurs occasionally	50 – 75%
5. Very Likely	Regular occurrence (daily / weekly / monthly)	> 75%

- Mitigating actions for high ('High' or above) scoring risks are to be reflected in Service Plans, managed by the Group Manager and implemented by Service Lead Officers;
- Lower scoring risks will either be accepted with no mitigating actions or included in work plans with appropriate mitigating actions that are managed by Service Lead Officers.

Report Number: WSC 147/13
Presented by: Toby Clempson – Principal Planning Officer – Policy
Author of the Report: Toby Clempson – Principal Planning Officer – Policy
Contact Details:

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Report to a Meeting of: Local Development Panel
To be Held on: 14th November 2013
Date Entered on Executive Forward Plan Or Agreement for Urgency Granted: n/a

REPORT ON IMPLICATIONS OF RESPONSES TO THE WEST SOMERSET LOCAL PLAN TO 2032 REVISED PREFERRED STRATEGY

1.0 PURPOSE OF REPORT

- 1.1 To set out the main issues raised in the responses and recommending further work necessary to prepare a sound Local Plan for formal Publication and Submission. Also, to provide a summary of all the responses to the consultation exercise (attached at Appendix A).

2.0 CONTRIBUTION TO CORPORATE PRIORITIES

- 2.1 The Local Plan will help to facilitate new housing development during the plan period which will secure funding through the New Homes Bonus scheme contributing to the “Local Democracy” Corporate Priority second bullet point “Maximise the funding opportunities from Central Government”.
- 2.2 The Local Plan will also contribute to delivery of the second and third bullet points of the New Nuclear Development at Hinkley Point Corporate Priority, helping to maximise the economic opportunities arising from the development, and also increasing the supply of housing within the area to mitigate the extra demands linked to Hinkley Point workers.
- 2.3 The preparation of a Local Plan is a statutory duty of local planning authorities.

3.0 RECOMMENDATIONS

- 3.1 **To recommend that the Council resolves to commission the following pieces of evidence arising from the responses and which are necessary in order to submit a sound Local Plan for examination by the Secretary of State:**
- **An assessment of the Local Plan strategy demonstrating its viability**
 - **A Heritage Asset Study**
 - **A landscape impact assessment of the proposed development allocations at Minehead.**

That Council note the likely requirement for a supplementary estimate to support the delivery of these studies.

4.0 **RISK ASSESSMENT**

Risk Matrix

Description	Likelihood	Impact	Overall
The Local Plan fails to comply with NPPF requirements for evidence and justification resulting in an unsound document.	Possible (3)	Major (4)	Medium (12)
<i>This report proposes the preparation of essential additional evidence to support the draft local plan policies addressing the requirements of the NPPF.</i>	Low (2)	Major (4)	Medium (8)
Revised planning policies addressing the NPPF's new requirements are included in the Publication Draft Local Plan but these are not considered by the examining Inspector to be sufficiently justified by appropriate evidence to fulfil the Council's statutory duty resulting in an unsound document.	Possible (3)	Major (4)	Medium (12)
<i>Responses to the consultation exercise have identified a number of additional pieces of evidence which will be needed to properly justify the Local Plan's policies and help to ensure that the Local Plan is found sound on examination.</i>	Low (2)	Major (4)	Medium (8)

The scoring of the risks identified in the above table has been based on the scoring matrix. Each risk has been assessed and scored both before the mitigation measures have been actioned and after they have.

5.0 **BACKGROUND INFORMATION**

5.1 The Local Plan Revised Preferred Strategy consultation (which ran from 29th July to 23rd September 2013) was carried out in order to test whether the changes made in response to the National Planning Policy Framework had properly fulfilled its requirements. Appendix A sets out a summary of the responses received.

5.2 The responses have been reviewed in the light of the tests of soundness in order to identify issues which suggest that further action may be necessary. These are set out below grouped by broad theme:

5.3 Strategic issues:

- The need for a viability assessment of strategic sites and an update regarding non-key strategic site development.
- The need to provide evidence of how the key strategic sites were identified, considered and selected against a range of reasonable alternative sites.
- The suggestion that more key strategic development sites should be allocated in order to give a better chance of realising the strategic requirements of the plan should some of the allocated sites not come forward.
- The lack of evidence and justification for the 3 hectares of non-residential uses on each of the Key Strategic Development sites, and also the lack of a clear indication as to what non-residential uses are to be required in each case.
- A number of issues surrounding settlement development policies: the impact of the removal of development boundaries, how the "within 50m" criteria would be applied, the appropriate level of growth for various settlements and how it would be managed over the plan period. Inconsistencies in the figures for the Primary and Secondary Villages in SC1 and SC2A – it has been suggested that the proportions of growth set

against the dwelling numbers for each settlement at the beginning of the plan period do not amount to 600 dwellings in total as required by SC2A.

- Misunderstanding as to the meaning of 'annualised average' in relation to the housing figures set out in SC2A, some respondents have (incorrectly) taken these to be annual maxima.
- The Inclusion or exclusion of various named settlements from the SC1 categories.

5.4 Housing issues

- Issues relating to the soundness of the housing evidence base, in particular the way in which the Strategic Housing Market Assessments have been prepared and updated, eg: it has been suggested that a new comprehensive review of both SHMAs covering the area within which West Somerset lies would be required to be able to demonstrate soundness in terms of an objectively assessed overall housing requirement.
- The lack of the SHMA update during the consultation period in order to allow proper scrutiny, some respondents have suggested that a much higher housing figure than 2,900 would be more appropriate.
- Affordable housing issues – particularly the appropriate development size thresholds in different settlement types,
- The 60% affordable housing proportion and the challenge of meeting it through the available mechanisms.

5.5 Heritage issues

- A number of NPPF heritage-related requirements have not been adequately incorporated into the Local Plan. In particular English Heritage has drawn attention to the lack of a proper Heritage Asset Study.

5.6 Landscape issues

- Exmoor National Park Authority has drawn attention to the need for a landscape impact study on the proposed strategic sites at Minehead – it is suggested that this is an NPPF requirement and that a previous Sustainability Appraisal had suggested it.
- Support for the designation of a local landscape protection area for the Brendon Hills (this has apparently arisen from a misunderstanding about the nature of the character area approach mentioned in the draft Local Plan, no such designation is proposed).

5.7 Other relevant issues

- The appropriate extent of Minehead's town centre policy area and the identification of Alcombe, Watchet and Williton's retail areas.
- A number of responses requesting clarification of various definitions or other matters, or called for additional definitions.
- Status / relationship to Local Planning process of the National Planning Practice Guidance and Housing Standards Review.
- Actions necessary to fulfil the Duty to Co-operate.

5.8 Conclusion:

It is suggested that in order to proceed to the formal publication of the Local Plan a number of additional items of evidence will be required in order to be able to demonstrate that the Plan's policies can be justified as set out as required by the NPPF. These include in particular: an assessment of the Local Plan strategy demonstrating its viability, a Heritage Asset Study for the area and a landscape impact assessment of the proposed development allocations at Minehead because of their proximity to the Exmoor National Park. These three

pieces of work would have to be commissioned externally. A number of other matters raised during the consultation exercise will be addressed by the planning policy team.

6.0 FINANCIAL / RESOURCE IMPLICATIONS

6.1 Briefs will be prepared for the three key pieces of work and a supplementary estimate will be sought from Council to provide the budget to deliver them. In addition consideration will need to be given in the 2014/15 budget setting process for the inclusion of the final two studies which are Habitat Regulations Assessment and sustainability Appraisal. Members should also note that further provision will be required in the 2014/15 budget for the cost of Examining and finalising the plan.

7.0 SECTION 151 OFFICER COMMENTS

7.1 This report forms an essential element of the Local Plan preparation process, ensuring that the Local Plan's policies are fully justified and evidenced. As such members need to fully examine the detail of the report and agree clear recommendations. This ensures that the plan has been fully considered and is as robust as possible to any potential legal challenges. Members should note that there will be an additional financial implication and this will be the subject of further reports to Council.

8.0 EQUALITY & DIVERSITY IMPLICATIONS

8.1 Members need to demonstrate that they have consciously thought about the three aims of the Public Sector Equality Duty as part of the decision making process.

The three aims the authority **must** have due regard for:

- Eliminate discrimination, harassment, victimisation
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it

9.0 CRIME AND DISORDER IMPLICATIONS

9.1 None

10.0 CONSULTATION IMPLICATIONS

10.1 No direct implication

11.0 ASSET MANAGEMENT IMPLICATIONS

11.1 None

12.0 ENVIRONMENTAL IMPACT IMPLICATIONS

12.1 Two of the evidence items for which preparation is recommended would directly help with the appropriate management of the environmental impact implications of development.

13.0 LEGAL IMPLICATIONS

13.1 The preparation of a Local Plan is a statutory duty of the Council, it is a statutory requirement that the plan be justified, the preparation of the items of evidence included in the recommendation is considered to be essential in order to demonstrate that the Plan is justified.

**WEST SOMERSET LOCAL PLAN TO 2032: REVISED PREFERRED STRATEGY
SUMMARY TABLE OF REPRESENTATIONS MADE.**

	Statutory bodies and government departments.
Environment Agency	<ol style="list-style-type: none"> 1. The positioning of new infrastructure around the three main settlements is welcomed. They do not anticipate any significant threat to the critical capacity thresholds of water supply or treatment services which cannot be managed through the development management process. 2. The allocation of the key strategic development sites within flood zone 1 is approved of. 3. Policies MD1, WA1 and WI1 all suggest contributions towards resolving flood risk and improving sea defences, there is no prospect of their provision at this time. The Agency would welcome the opportunity to discuss the matter and also the Coastal Change Management Areas. 4. Future discussion should include flood risk related infrastructure using new development to reduce the causes and impacts of flooding (NPPF para. 100 refers). 5. Para 3.2 SFRA levels 1 and 2 should be updated to take account of any new flood risk information since they were prepared. 6. Para 5.3 reference to climate change mitigation and adaption should be included in the spatial vision for development in West Somerset (NPPF paras. 94 and 156). 7. Para 6.1 flood risk management for new development at Minehead Watchet and Williton is a strategic objective of the plan, reference to CO2 reductions could be enhanced by incorporating the climate change agenda. 8. Support expressed for inclusion of SD1 9. Policy SC1 reclassification of Dunster Marsh as a Secondary Village is welcomed. This also allays the Agency's fears regarding any potential future realignment of the West Somerset Railway in this area due to climate change and sea level rise. 10. In defining development criteria points in paragraphs 2 – 5 specific reference should be made to flood risk criteria and sequential test requirements as defined in NPPF para 100. 11. Policy MD1 – flood risk infrastructure details are not provided. 12. Policy WA1 – as for MD1, also pleased to see reference to allowance for potential realignment of the West Somerset Railway due to coastal erosion. 13. Policy WI1 – as for MD1. From a biodiversity perspective, concern expressed at the statement that strategic development at Williton should assist with management of the Monksilver Stream and Doniford Brook, as these are both in Good Ecological Status, and any option leading to their modification must be considered in the context of the legal requirements of the Water Framework Directive. 14. Policy LT1 – pleased to note that the longer term development sites are both within flood risk zone 1. 15. Policy CC2 – reword opening statement to put avoidance of flood risk before mitigation of flood risk. 16. The assumption section should include reference to NPPF and the Technical Guide to NPPF. 17. The overall flood risk management policy is acceptable in principle, however any policy detailing the sequential approach must incorporate the prescribed allowance in respect of climate change as outlined in the NPPF Technical Guide. 18. The promotion of sustainable drainage systems is also supported. 19. The purpose section should also include reference to NPPF and the NPPF technical guidance. 20. Policy CC3 – The Coastal Change Management Areas are acknowledged. 21. SMP2 remains in draft status, however the EA is willing to reference this draft document as a material consideration in the development process pending its final signoff.

	<p>22. Bullet point 4 on page 61 should state that the secondary lines in Draft SMP2 are indicative.</p> <p>23. Policy CC6 – In view of Water Framework Directive (WFD) obligations, we may wish to include distinct policy provisions.</p> <p>24. Policy NH3 – development near watercourses should be required to conserve watercourses and their floodplains as areas of open space to benefit biodiversity reduced flood risk and provide for informal recreation.</p> <p>25. Policy NH4 – specific referencing of the importance of conserving river corridors to enhance green infrastructure is recommended.</p> <p>26. Policy NH6 – Endorse the objective of developing brownfield land, but such sites may prove difficult in viability terms because of the remediation of contamination which may be involved.</p> <p>27. Policy NH10 – is welcomed.</p>
English Heritage	<p>1. Policy NH1 does not achieve the conservation of the historic environment in terms of the principles and policies for the historic environment set out in the NPPF. There must be a strategic policy to conserve and enhance the historic environment of the area, as a starting point for planning applications and neighbourhood plans.</p> <p>2. Development Management policies are lacking in particular.</p> <p>3. Up to date evidence on the historic environment appears to be missing from the council's website. It is understood that such work was carried out, but it needs to be publicly available. It should include an assessment of the significance of the area's historic environment including its designated and non-designated heritage assets (NPPF 158, 169 footnote). Without this evidence the local authority cannot properly assert that the objectives for sustainable development have been understood, and therefore cannot say whether the objectively assessed development needs of the area will be met or no in accordance with the presumption in favour of sustainable development (footnote NPPF 14).</p> <p>The evidence base needs to express:</p> <ul style="list-style-type: none"> • What the area's historic environment is comprised of; • What the issues pertaining to the historic environment are; and • What opportunities the historic environment presents. <p>Identifying the area's historic environment needs to address the following:</p> <ul style="list-style-type: none"> • how the area has developed through history; • what designated and non-designated heritage assets the area includes, and is surrounded by; • the contribution of the settings of the identified heritage assets; and, • scope for enhancement. <p>This is not just an exercise in listing known sites, but of understanding their value to society (their significance), i.e: their potential to contribute to the delivery of other sustainable development objectives</p> <p>Without an understanding of what are sometimes subtle qualities of an area, its local distinctiveness and character may be easily lost.</p> <p>There also needs to be an assessment of the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest will be discovered in the future (footnote NPPF 169).</p> <p>4. Specific changes were proposed in order to fully incorporate the protection and promotion of the historic environment into policies: EN1, EN2, SC1, MD1, MD2, WA1, WA2, WI1, WI2, LT1, SV1, EC1, EC10, EC11, CC3, NH1, NH2, NH4 and NH10 in order to make them NPPF compliant.</p>
Natural England	<p>1. The plan is considered to be generally legally compliant, sound and in conformity with the NPPF.</p> <p>2. Policy MD2 refers to biodiversity offsetting, it is understood that this relates to the possible need for the provision of off-site mitigation to support qualifying features of the SAC utilising areas outside the SAC boundary, rather than as compensatory measure. With this in mind, NE is satisfied that this accords with the findings of the Habitats Regulations Assessment</p>

	<p>recommendations.</p> <ol style="list-style-type: none"> 3. The Council is encouraged to make clear in the Local Plan that the priority is to protect existing habitat first, biodiversity offsetting is only to be used as a last resort. 4. New policy NH10 – is supported, it should complement policy NH4 regarding green infrastructure. 5. Regarding Sustainability Appraisal and Habitats Regulations Assessment, the Council's view that the Revised Preferred Strategy serves to provide greater detail on the same strategy and so is considered to be covered by the same Habitats Regulations Assessment (HRA) and Sustainability Appraisal (SA) is accepted by Natural England. However it notes that the Council intends to complete a further HRA and SA report to accompany the Publication draft Local Plan, Natural England would be pleased to consider these in due course.
Defence Infrastructure Organisation - Safeguarding.	The main towns identified are: Minehead/Alcombe, Watchet and Williton, which fall outside the statutory safeguarding consultation areas. The consultation relates to sites we provided comment to in 2009/2010, therefore MOD currently has no further comment to make.
Office for Nuclear Regulation	Declined to make a comment on the Local Plan, it was indicated that ONR will respond, where appropriate to planning applications which meet ONR's consultation criteria.
Local Authorities and Police and Crime Commissioner.	
Somerset County Council Highways and Transport Commissioning.	<ol style="list-style-type: none"> 1. Para 2.9: There is data and modelling evidence indicating that Hinkley Point C workers approaching from the south along the M5 would leave the motorway at J24 rather than J27. 2. Paras. 4.4 and 6.1 – 'CO2' mis-spelled. 3. Policy SC1 parts 2,3 and 4 – SCC H&TC does not support encouraging new residential development in the countryside in isolation (ie without business or community services) as it is unsustainable, being likely to increase the number of vehicular trips. 4. In SC1 part 4 the provisions of the SCC document "Transport and Development" (Feb 2011) must be taken into consideration alongside requirements for easy access to the existing highway network. 5. Policy SC2 – SCC would support the provision of more residential properties in the larger of the settlements outside the three main towns where services can be enhanced and supported which will reduce the need to travel. 6. Policy SC3 – Agreed, especially where mixed use is delivered in the smaller settlements. 7. Policy SC4 – The policy seems over complex and without evidence, will encourage developers to provide affordable housing on small sites making infrastructure harder to deliver. Also, it is inconsistent to demand greater numbers of affordable houses in rural areas than in the main settlements. AH should be delivered in larger numbers at the main settlements instead. 8. Policy SC6 – Smaller scale developments would also benefit from being mixed use to create more sustainable communities. 9. Policy WA2 – Developer funded walking and cycling links must be provided to link the centre of the town with the site to avoid severance. Masterplanning of the town would also help. 10. Policy WI1 – Any transport improvements within the village must be delivered by the development. SCC H&TC would be interested in seeing any updated version of the Williton Masterplan which raised more questions than it gave answers. 11. Policy WI2 – it is essential that developer funded walking and cycling links are provided to connect the west and north of the town with the centre to avoid severance. Further Masterplanning of Williton would be helpful. 12. Policy SV1 – Development at other settlements should not have an adverse impact on the local transport network. 13. Policy OC1 - SCC H&T would suggest that residential development in the countryside is only provided alongside a business use, to avoid unsustainable developments being delivered. 14. Policies EC1, EC2, EC4 - Developments under these three policies must demonstrate that they will not have an adverse impact on the transport network. In addition, developments that trigger a Travel Plan (as identified in SCC's 'Travel Planning Guidance' November 2011)

should be required to implement a Travel Plan as part of the planning process.

15. Policy EC3 - Developments that trigger a Travel Plan (as identified in SCC's 'Travel Planning Guidance' November 2011) should be required to implement a Travel Plan as part of the planning process.
16. Policy EC7 - SCC H&T would request that all training and educational developments are required to demonstrate no adverse impact on the transport network and prepare a Travel Plan as part of the planning process.
17. Policy EC8 - While SCC H&T supports this in principle, such development should not be at the detriment of the transport network.
18. Policy EC10 - SCC H&T would support this approach and would seek the inclusion of transport measures in these developments (interchange or transport hub) to enhance the viability of these locations.
19. Policy TR1 - SCC H&T supports the inclusion of transport infrastructure outlined but question how this is going to be funded in the absence of CIL. The County Council is unlikely to be in a position to prioritise any of these initiatives for funding through the limited mechanisms available. With the limitations on pooling S106 contributions, it maybe that transport infrastructure improvements cannot be made in West Somerset in the future.
20. With regard to the 'Green Transport Plan', SCC H&T is not clear what type of document this is. If it is a Travel Plan, then it would be easier to state this as the terminology 'Green Travel Plan' etc. is a dated phrase. If it is not a Travel Plan, it might be necessary in the supporting justification to indicate what this is.
21. Policy TR2 - Please add further bullet points:
 - It delivers additional walking and cycling improvements to the local community.
 - It is implemented alongside a Travel Plan.
 - It is in line with standards outlined in the Somerset Parking Strategy (adopted March 2012; revised September 2013).
22. Policy CC1 - Every new home should provide vehicular access to a 16amp plug to future proof developments for measures such as electric vehicles, as identified in the Somerset Future Transport Plan (adopted February 2011) and Somerset Parking Strategy (adopted March 2012; revised September 2013).
23. Policy NH10 - Parking layout and standards should be in line with the Somerset Parking Strategy (adopted March 2012; revised September 2013). Every new home should provide vehicular access to a 16amp plug to future proof developments for measures such as electric vehicles, as identified in the Somerset Future Transport Plan (adopted February 2011) and Somerset Parking Strategy (adopted March 2012; revised September 2013).
24. Policy ID1 - Without a clear masterplan in the main three settlements, it is difficult to see how any IDP may be progressed. It should also be noted that any new infrastructure required as a result of development must be fully funded by the developer.
25. Throughout the document, SCC H&T has noted the following transport infrastructure requirements:
 - Realignment of the West Somerset Railway (Policy WA1)
 - Improve linkages between Watchet town centre and parts of the town to the south (WA2)
 - Improvements to the transport infrastructure in Williton (WI1)
 - Re-alignment of the B3191 (LT1)
 - Improvement of Public Transport Services (TR1)
 - Making walking and cycling more attractive and safer as means of transport (TR1)
 - Road Improvements (TR1 - not specified if different from point 4)
 - Improvements to the heritage railway service of the West Somerset Railway (TR1 - not specified if different from point 1)

Without undertaking any detailed analysis in relation to cost, which would need to be undertaken by WSDC through a detailed transport assessment, SCC H&T would suggest that these transport schemes alone will add up to several millions of pounds. With the significant restrictions being placed on the level of pooling of contributions through S106, the question

	<p>has to be raised whether this list is ever likely to be delivered during the plan period. In light of the choice not to pursue CIL, it is suggested that infrastructure aspirations for the District are reconsidered.</p>
<p>Somerset County Council Acoustics Specialist</p>	<ol style="list-style-type: none"> 1. Policy NH2 should broaden the requirement to consider landscape protection beyond designated areas and highlight the topic of tranquillity (as required by paragraph 123 of the NPPF) as this is not considered in the 1999 West Somerset Landscape Character Assessment. 2. The Plan makes no provision for the protection of urban green space and areas to which paragraphs 76 and 77 of the NPPF may apply. These are outside of the scope of NH2 yet may be under threat due to urban expansion. NH4 (Green Infrastructure) CF1 (Maximising access to recreational facilities) and NH1 (Historic Environment) could be amended to address this matter if the green spaces are considered to form part of recreation and the existing built environment. <p>Justification is as follows:</p> <p>Point 1</p> <p>The Draft West Somerset Local Plan recognises the importance in protecting natural areas and attention is drawn to the existence of designated landscape areas in paragraph 2.8.</p> <p>The presence of policy NH2 is welcomed in that it encourages non-specific requirements to minimise adverse impact (that might be interpreted to include noise) on designated landscape areas. The purpose statement to NH2 however indicates that the protection of non-designated areas may be an issue and indicates that the 1999 West Somerset Landscape Character Assessment may provide further justification to consider development impacts and protect non-designated areas. However, the 1999 assessment makes no mention of tranquillity, the policy may therefore require to be strengthened by including a more general requirement to consider tranquillity within both designated and non-designated areas as defined in the National Planning Policy Framework in section 123</p> <p>The specific reference to tranquillity may be further justified since this will be an important feature to tourists visiting many areas within West Somerset. This view is supported by the 2001 Defra report: 'Survey of public attitudes to quality of life and to the environment' which concluded that 'peace and quiet' was the most common reason for visiting the countryside. The five most mentioned positive features of the countryside were tranquillity (58 per cent), scenery (46 per cent), open space (40 per cent), fresh air (40 per cent) and plants and wildlife (36 per cent). The consideration and protection of aesthetic aspects of landscape including tranquillity is detailed within guidance on Landscape Character Assessment issued in 2002 by The Countryside Agency.</p> <p>The need to consider tranquillity as part of the enjoyment of landscape helps to meet two of the Plan's strategic objectives set out at paragraph 6.1:</p> <ul style="list-style-type: none"> • Develop the quality of the tourism offer within the Local Plan area • Conserve and enhance the character of historic settlements, buildings and landscapes <p>Point 2</p> <p>Policy ID1 recognises the importance of creating green space within new development and policy NH4 encourages the development of green infrastructure with the key aim to maximise the value of public access land. Such green areas offer opportunity to escape urban noise. However, the Plan makes no direct reference to the need to protect areas of existing green space within existing urban areas. The Plan may need to address the concept of Local Green Space as defined within 76-77 of the NPPF which may help to protect existing green spaces from increasing development pressure.</p> <p>It is unclear whether the Local Plan has addressed the issue of Local Green Space as set out in paragraph 76 of the NPPF: "Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period".</p>
<p>Exmoor National Park Authority.</p>	<ol style="list-style-type: none"> 1. Policy SC1 – Hierarchy of Settlements: The addition of two further tiers within the settlement hierarchy, to include primary and secondary villages, is welcomed as it provides more certainty. However some villages have been removed since the 2006 Local Plan, notably Monksilver and Withycombe which both lie across the LPA boundary, and are both proposed within the Exmoor National Park Draft Local Plan as settlements where some development could take place. There should be a consistent approach between the two LPA areas for these settlements.

2. The Taylor Review emphasises the importance of allowing some development for such small rural settlements in order to sustain their community life.
3. Poor access from the County highway network should not be used to constrain development in them either. Local needs development is unlikely to exacerbate traffic levels to an unsustainable degree.
4. Also, omitting settlements from the hierarchy prevents them shaping their future through Neighbourhood Development Planning.
5. The Council should either revise the Secondary Village category to include Monksilver and Withycombe and other similar smaller rural settlements, or create a new category for smaller rural communities where only exceptions site affordable housing would be permitted.
6. It is unclear from the plan whether exceptions site affordable housing schemes would be acceptable in settlements not identified in the hierarchy.
7. 'Small scale development' for the secondary villages is defined as: up to 5 dwellings over the plan period to 2032. The Authority considers such a figure to be arbitrary, it is recognised that such a figure is intended to keep the level of overall development to an acceptable level in smaller rural communities, but the figure is not based on any indication of overall local affordable need that may arise in the parish or surrounding areas, or whether the settlement has capacity for additional development in terms of landscape and/or other constraints including flood risk and ecological factors. A criteria based approach reflecting these issues (as set out in clause 5c of policy SC1), could be utilised to ensure that small scale development of an acceptable level is achieved.
8. Policy SC2A – the affordable housing enabling approach set out in the plan means that the 30 per annum in the primary and secondary villages is unlikely to provide for the housing needed locally.
9. Policy SC4 Affordable Housing – As there are no longer any development limits for the settlements, the Authority suggests changing 'around' in clause 4 to 'adjoining' so the sentence reads: "Local needs affordable housing will be considered on sites in and adjoining settlements" or a cross reference to policy SC1 clause 5.
10. In SC4 (4) the terms settlement and settlement cluster should be defined.
11. The minimum proportion of affordable housing to market housing has been improved to 35%:65%, including within the smaller identified settlements. Whilst an improvement, this approach could still prove problematic for delivering affordable housing to meet local needs given the restriction of 5 dwellings in secondary villages over the plan term.
12. The change to a minimum threshold of 3 dwellings for affordable housing provision will worsen the provision of affordable housing for local needs as a proportion of all residential development in those settlements. An exception site approach should be used which ensures that more affordable than market houses are delivered in those settlements.
13. Policy MD1 Minehead Development – changes to make the policy criteria inclusive are supported. Reference to the National Park should be added within the written justification as follows: "...and the high quality landscape of Exmoor National Park which surrounds the town to the north, west and south."
14. Policies MD2 and LT1 – key strategic development site and longer term development site at Minehead/Alcombe. Concern is expressed at the identification of these sites because it believes that they may have adverse impacts on the National Park designation and its purposes.
15. For avoidance of doubt, the Authority suggests that policy MD1 should include a specific test in relation to avoiding likely significant effects on the Exmoor & Quantock Oak Woodlands SAC through detailed design schemes and appropriate offsetting measures.
16. The NPPF states that "great weight should be given to conserving the landscape and scenic beauty in National Parks...which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads". Additionally the Environment Act 1995 Section 62 11A confers a duty on certain bodies and persons to have regard to the purposes for which National Parks are designated. The written justification for policy MD2 cites that the allocated area is unconstrained by landscape designations, and does not make any specific reference to the close proximity of the National Park and potential impacts any development on this site may have on its setting.

The guidance note relating to the section 62 duty published by Defra clearly states their expectations of relevant authorities to include that “it may sometimes be the case that the activities of certain authorities operating outside the boundaries of these areas may have an impact within them. In such cases, relevant authorities will also be expected to have regard to the purposes of these areas”. In such cases it is expected that the relevant authority are able to demonstrate how they have considered the purposes of the National Park in decision making, or in this case plan making. A number of ways are suggested including undertaking and making publicly available an assessment of the impact on the National Park and showing how decisions affecting these areas have been properly considered and recorded in high level policy documents and public statements.

17. The SA Non-Technical Summary (made available during the previous consultation) noted that:

“For development in the strategic development areas and employment sites several mitigation measures will be needed before development goes ahead including measures to reduce noise, provide ecological assessments, measures to improve drainage and reduce the risk of flooding, the provision of adequate community services, improvement of public transport and landscape appraisals (especially for development in areas of Minehead that may bring development closer to Exmoor National Park)[our emphasis].”

The Authority considers that the SA findings to the previous consultation have only been partially addressed through the insertion of a design policy. The assessment of the site allocations would have been more robust if the impact of sites MD2 and LT1 on the National Park was assessed prior to the allocation and mitigation measures introduced in the Local Plan (Revised Preferred Strategy).

In terms of the Authority’s consultation response and in relation to the duty to co-operate the Authority would suggest that the impact of the key strategic housing sites LT1 and MD2 on the National Park be objectively assessed in relation to the points raised in paragraph 2.30 above and that any decision is properly considered and recorded in the publication version of the West Somerset Local Plan; including any relevant policy amendments. This is a precautionary approach as it considered that there is not enough evidence publicly available, to be able to demonstrate that there will not be an adverse impact on the National Park.

18. Policy SV1 Development at Primary and Secondary Villages – the Authority supports the addition of the first clause in relation to design – a cross reference to the design policy should be added. The written justification does not reflect the approach set out in policy SC2 in relation to small scale development for the secondary villages and the Authority reiterates the comments made in relation to this point (see para. 2.21 above).

19. Policy TR1 Access to and From West Somerset – the Authority supports the insertion of the requirement of a green transport plan for larger development proposals, but would suggest that this term is qualified in the text with regard to paragraph 32 of the NPPF “all developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment” [our emphasis].

20. Policy NH1 Historic Environment – Listed buildings should also be included in the justification, also a description of the Historic Environment Record would be a helpful source of information to future applicants.

21. Policy NH10 – securing high standards of design – the inclusion of a design policy is supported. For larger developments the principles of “Building for Life 12” could usefully be endorsed by the Council in the Local Plan. The nature of the “Landscape Framework” mentioned in the policy should be clarified. Reference to the Exmoor National Park Dark Sky Reserve should also be made to encourage efficient lighting which will contribute towards the conservation and enhancement of Exmoor’s dark night sky.

<p>Police and Crime Commissioner for Avon and Somerset</p>	<p>Drew attention to the additional policing requirements for the population arising from an additional 2,900 dwellings. Equivalent to approximately 8 or 9 members of staff and appropriate policing infrastructure and equipment.</p> <p>Therefore, on the key strategic sites, the police should be involved in negotiations for S106 or CIL monies to cover an appropriate proportion of these additional policing costs.</p> <p>New policy NH7 is welcomed, Avon and Somerset Police would also wish to be consulted on development proposals in close proximity to the Hinkley Point site, as in the event of the need for evacuation in an emergency, the burden on police resources, and the risk to all concerned would be minimised.</p> <p>New policy NH10 is also welcomed. It was requested that developers be required to demonstrate how crime prevention measures have been considered in the design of any medium and/or large scale proposal, and how the design reflects the attributes of safe, sustainable places, in the context of the Safer Places – The Planning System and Crime Prevention (2003) document. We would also request developers be advised to consult with the relevant Crime Prevention Design Officer, from a ‘designing out crime’ perspective.</p>
<p>Town and Parish Councils</p>	
<p>Minehead Town Council</p>	<ol style="list-style-type: none"> 1. <u>Transport</u>: <ul style="list-style-type: none"> - To cope with the development proposed developments a much more substantial bus service is required - The A358 requires improving to cater for additional large delivery vehicles using the area, possibly by lowering the road under the railway bridges. - There is no direct bus link to Bridgwater for those living west of Minehead. 2. <u>Demographic</u>: <ul style="list-style-type: none"> - The age of people moving to the area and cutbacks to public transport mean that car use will increase strain on already overused A roads in the area. - no economic vibrancy forecast for the next 10 years provided, with the only mitigating factor being high speed broad band (which is vital for people working at home to alleviate pressure on the dated road links to the major conurbations in Somerset). 3. <u>Settlements</u> <ul style="list-style-type: none"> - Houses should be of varying type, adaptable and multi-useable for all ages - Affordable housing should be on a larger scale than 8. This is a too generous allocation it should be 12 or more - Object to LT1 which is totally unacceptable for families and social housing. There is no public transport, no local facilities and no school, in the vicinity of this area. To come out so far from the main settlements where there is no infrastructure to support this housing is ridiculous 4. <u>Employment and Economy</u> <ul style="list-style-type: none"> - The only area of major employment is the Mart Road Industrial Estate which is currently fully developed - It seems the only employment available will be through home working with high speed broadband - Restrict the conversion of large houses into flats/apartments and encourage the development of office space above shops and by change of use of large houses. Although there are starter units for light industry or commercial projects there is a distinct lack of office space for small businesses in the Minehead area.
<p>Watchet Town Council</p>	<ol style="list-style-type: none"> 1. Refers to its previous Preferred Strategy response, in particular to policy EC10. 2. Supports policies SD1, SC1, SC2, SC2A, SC4, SC5, SV1, OC1, EC5, TR1, CF1,CD4, NH7, NH10. 3. Has no comment to make in respect of MD1, MD2, WI1. 4. WA1 point about potential realignment of the WS Railway due to coastal erosion is noted - in the interests of consistency, especially in respect of policy LT1, this point should also refer to potential realignment of the B3191 due to coastal erosion. Under “Purpose”: Para two, the section in brackets should be deleted. “Active coastal erosion ...” additional wording should be added to refer to the B3191 point

	<p>mentioned above. See also WTC's previous comments about public realm enhancement this should be incorporated into the policy.</p> <p>5. WA2 – Concern was expressed that the main Key Strategic Site in Watchet is to be WA2. Joining together sites E3 & E4 (Fig 11, Appendix 3, 11 April 2013) should be further considered. These sites to the east of Watchet do not narrow the gap between Watchet and Williton. Together, they would be large enough to form a KSS.</p> <p>Reservations expressed about WA2. The Watchet Music Festival main site is in the field to the NW of WA2. Fields within WA2 are used for festival parking and camping. Although the festival currently has a limited time left on its lease and it only uses these fields for a few days a year, it has become an important part of the local tourist economy. We would not wish to see the development of WA2 put the future of the festival at risk. We would only accept the designation of WA2 as a KSS if provision was made to secure an alternative site for the festival in Watchet and this was written into the Local Plan in an appropriate way,</p> <p>Reference also made to WTC's previous comments about vehicular and pedestrian access to the Parsonage Farm site.</p> <p>6. LT1 - Concern expressed about designation of LT1 as a KSS post 2026. No capacity is identified. The need to plan for the potential realignment of the B3191 is however recognised. It seems illogical to contemplate the building of houses on land subject to active coastal erosion. W1A - On page 39, first paragraph, the reference to figure 7 should be figure 6. The Williton KSS sites are not labelled on the map. Support is expressed for the designation of area H1a to the west of Williton as a KSS.</p> <p>7. Concern is expressed about the designation of land to the north of Williton as KSSs because of our policy requirement to prevent the conjoining of Watchet and Williton. We have serious reservations about area G1 north of Danesfield School and west of Liddymore Lane being designated a KSS for this reason.</p> <p>8. The designation as a KSS of area G2 north of Roughmoor Industrial Estate between Liddymore Lane and the West Somerset Railway is not of concern, however, it is not large enough on its own to be a KSS.</p>
<p>Williton PC</p>	<p>Concerns raised about level of development proposed and impact upon transport infrastructure. Not clear how new residents would be discouraged from travelling to Taunton or Bridgwater.</p> <p>The encouragement of additional tourism development will also impact adversely on transport and road traffic in particular.</p> <p>Until funding is provided to improve the transport infrastructure West Somerset will remain the disastrously deprived area that it is. Example quoted of young people being unable to take jobs they are offered because they can't travel to them.</p> <p>Specific comments:</p> <p>Page 28 - Include Williton in bullet point 2 "present measures to address the flood risk in Minehead, Watchet and Williton."</p> <p>Appendix Fig 6 - The marked areas for development give concern that more building will have impact on flooding</p> <p>Page 10 - 4.3 - "Increasing the proportion of non-private car travel within the District" – needs explanation</p> <p>Page 36 – Purpose - Having identified the problem, what are the solutions?</p> <p>There is a lot of development marked on the plans but insufficient emphasis is placed on solutions and the outcome of the development.</p> <ol style="list-style-type: none"> 1. The Council's biggest concern is the change to 35 affordable developments to every 65 open market, the figure is extremely high – which is worrying for the following reasons: <ol style="list-style-type: none"> (a) Developers will be discouraged from building high quality development with this level of affordable housing (b) Will it be possible to finance local services with an increased population but without suitable job opportunities? Substantial investment seems unlikely apart from Hinkley Point (which is not certain). <p>If 1500 of the new homes are to be affordable what jobs will there be for these</p>

	<p>people? If they can't find work their living costs will have to be subsidised.</p> <p>The Parish Council's precept was short this year due to the high level of households which did not contribute towards their own rates. The PC's budget was topped up by government grant. There is no certainty that this grant will continue in the future.</p> <p>The council could possibly achieve more ratepayers by really promoting this area as a great place to retire to and we should perhaps be promoting the building of this type of accommodation. This would result in attracting people to the area who have a disposable income that can be spent in the area and increase the job opportunities within the service sector that can be sustained throughout the year rather than just during the tourist season.</p> <ol style="list-style-type: none"> 2. It is positive that the Plan is in line with the Williton Master plan which was supported by the Parish Council. It is suggested that the improved traffic management measures for Williton incorporated into the Plan's strategic development proposals take the form of a relief road to be routed as suggested in the draft Master plan, through the Co-op site. 3. The statement in 2.7 that 'the management of flood risk in planning for development will be an important task for the local plan' is welcomed. This is a vital matter when considering any development proposal in Williton.. 4. In 4.1 point 3 the plan states the wish for 'improved provision of sport and recreational facilities' – Williton being on junction of A358 and A39 it would be a great location for new leisure centre/ swimming pool also being fairly central for West Somerset
Sampford Brett Parish Council	<ol style="list-style-type: none"> 1. The proposed amendments are considered to address the changes introduced by the NPPF 2. The additional clarity provided in policy SC1 as to the treatment of rural settlements is welcomed, given that Sampford Brett is not a Primary Village or a Secondary Village it is understood that the village is to be treated as Open Countryside, this approach is welcomed as being appropriate for the village.
Holford Parish Council	<ol style="list-style-type: none"> 1. The proposed amendments may address the changes introduced by the NPPF, however flexibility is needed over the criteria used to determine which villages fall into the Primary and Secondary Villages categories. 2. SC1 Hierarchy of Settlements – The definition of Secondary Village contains an admission that they are "constrained by poor access from the County Highway Network". There are no proposals included to improve this state of affairs and thus equip these villages to better meet their needs in the future. 3. SC2 Housing Provision – The annual average of 30 dwellings is insufficient for the Primary and Secondary villages to ensure their continued health and sustainability. In particular Secondary Villages need the scope for more growth to sustain the few services that they possess. 4. SV1 Development at Primary and Secondary Villages – The purpose and assumptions underpinning the policy refer only to larger rural villages. Holford, classed as a Secondary Village with its two hotels, and 1 non-agricultural business employing upwards of 15 people, is inadequately provided for in this policy and may be incorrectly designated as a Secondary Village.
Stogumber Parish Council	<ol style="list-style-type: none"> 1. Noted its appreciation at the incorporation of the PC's requested changes from the previous consultation. 2. Ref. 2.0 "Whilst villages tend to have a minor role in terms of service provision (if any), most do at least have a village hall." The final phrase is dismissive, and does not reflect SC1 (Hierarchy of settlements) and the Definitions in particular. We suggest that this sentence is amended to read as follows: "<i>Villages tend to have a minor role in terms of service provision; some have a shop, pub, school and village hall, and others have only some of these services.</i>" 3. Ref. 2.2 description of the Quantock Hills AONB would more appropriately be reflected if 2.2 were amended to read as follows: "The Local Plan area Comprises: <ul style="list-style-type: none"> - a coastal zone between Minehead in the west and Steart Peninsula in the east, - the north western part of the Quantock Hills AONB, notable for its exposed moorland character, which gives way on its lower slopes to woods, meadows and streams, the whole contributing directly to the historic character and distinctiveness of villages and

hamlets located within the AONB,

- a low-land agricultural (woodland, pastoral and arable) vale [or you could say landscape] with scattered villages and hamlets, between the Quantock Hills AONB and Brendon Hills,
 - to the south, part of the Brendon Hills and
 - A further, detached southern area at Brushford in the Barle Valley to the south of Exmoor.”
4. In SC1 and SC4 the terms “affordable housing” and “local needs housing” are sometimes used interchangeably, intended (it seems) to mean the same thing, but there are other references through the draft to “local need” where it does not appear to specifically mean “affordable housing”. This causes confusion. It is suggested that “affordable housing” be adopted consistently throughout the Local Plan where it is intended to refer to social-rented and shared-ownership housing, and housing where there is a local-residency requirement or agricultural-tie, etc. “Local need” should be defined as being: “...where it meets a clearly identified local need for affordable [ie rented, shared ownership, etc.] or open-market homes.”
 5. SC1: Hierarchy of settlements: Definitions: Limited Development - “...limited to a maximum of 30% of this increase [ie 10%] in any five years.” Expressing this as 30% of 10% seems confusing; it may be easier to say “...limited to a maximum of 3% in any five year period.”
 6. SC1: “Open countryside” should be added to the definitions here, as there are references to it through the draft. In particular, there are settlements (for example Vellow, Crowcombe Heathfield, Bilbrook) that are not defined as Primary or Secondary Villages but do not intuitively look like “open countryside”. A definition of Open Countryside that specifically included settlements not listed in the hierarchy would make it clear how these settlements are to be treated.
 7. SC4: Affordable housing - Since affordable housing is needed across the whole District, we think that the same threshold should apply across the whole district. Why should a developer in Minehead ‘get away’ with not making a contribution when building up to 7 dwellings, but the same developer has to make a contribution when building 3 dwellings in Stogumber? It is suggested that a threshold of 3 should apply everywhere; in any event, the threshold for Primary Villages should not be more than 3.
 8. SC4: Affordable Housing – the wording of the policy should be tightened in terms of locational criteria to read: “Affordable [see above] housing will be considered on sites within or in close proximity (within 50 metres) to the contiguous built-up area of settlements where it can be demonstrated that; ...”
 9. SV1 3rd bullet - “Help create balanced communities (including settlement-clusters of villages and hamlets) at a level appropriate to the role and function.” Concern is expressed that “*settlement-clusters*” are not defined creating ambiguity. The first two bullets are supported, the main justification for development in the Primary Villages is to maintain service provision.

The third bullet would be satisfactory if the phrase in brackets were deleted. Otherwise we see much debate and confusion about eg: whether development at Lawford, helps make Crowcombe more ‘balanced’ and if it does, would this also apply to development at Crowcombe Heathfield or Halsway. If development is to benefit a Primary Village, then it would generally need to be in that Primary Village, and it is too hard to phrase the policy to cover any rare exceptions where development in a hamlet would also meet the objective). However, if there are any particular clusters that are intended to be covered by this phrase, they should be identified.
 10. OC1 Open Countryside – the term should be defined in the justification.
 11. OC1: Open countryside development: “...sustainable land management or smallholding business” – Concern is expressed that there should be a requirement to demonstrate that the “sustainable land management or smallholding business” is economically viable and is the main source of income for the residents. The size of the dwelling should be limited to an appropriate size for its function.
 12. NH2: Landscape character protection - Part of the parish of Crowcombe, and most of the parish of Stogumber, is between the Quantock Hills AONB and Exmoor National Park and thus does not benefit from statutory protection. There is real danger that development which is not permitted in the AONB or National Park will be concentrated in the corridor between the two. I.e. the proximity of the AONB and ENP leads to additional development pressure, with development being displaced from the AONB and ENP. We strongly feel that this danger should be addressed in the policy, and reference added under ‘Justification’ to the high quality

	<p>rural landscape of the vale between the Quantocks and the Brendons, including the Doniford stream catchment.</p> <p>13. NH10: Securing high standards of design - "...creates an individual place with a distinctive character"</p> <p>There is a need to encourage developments that respect and enhance the character of the place, whilst being of the 21st century. The reference under 'Justification' to "...enhances local character." must be added to the policy wording itself.</p> <p>Many developments will take place on the fringes of settlements, where neighbouring 20th century development may be used as justification for more of the same. The second bullet under 'Justification' states "new development should connect seamlessly to surrounding development in terms of layout, scale, form, enclosure, space and materials...". This would be desirable if the surrounding developments were of a high standard of design, but often they are not, this could result in a requirement for poor quality design which is undesirable.</p> <p>New development should be seen as an opportunity to restate and reinforce the true local character, even where this has been eroded by more recent developments. This is not, of course, an argument for fakery. There is good wording to this effect later in this section, and so some amendment or deletion of some of the text quoted above should suffice.</p> <p>Small domestic applications should not be automatically excluded.</p> <p>It is often the accumulation of small details that constitute local character, and small domestic applications are an opportunity to refer to the local idiom, and this need not be onerous or unduly expensive. In the case of small domestic applications, character may be as much protected by not needlessly removing existing details and features as there would be in the additions.</p> <p>14. Two points requiring clarification:</p> <p>A - The Plan refers to the percentage increases in the number of dwellings over the Plan period. The baseline dwelling numbers must be clearly stated in the Plan.</p> <p>B - Clarification is also needed of the way in which "within 50 metres to the contiguous built-up area of primary and secondary villages" will be applied. Is the 50 metres measured from the dwellings or their curtilages?</p>
Crowcombe Parish Council	<p>Endorses all the points made by Stogumber Parish Council summarised above, with the following additional points:</p> <p>1. SC1: Hierarchy of settlements: 5 – Concern is expressed that sub paragraphs A –F do not take into account important considerations of the differing geographies within the plan area identified in 2.2 (and not adequately safeguarded by NH2). For example, in respect of Crowcombe, the extant local plan emphasises the importance of the unique "two distinct parts" character of the settlement, which affords a natural habitat and wildlife link between hills and valley, and which contributes to the unique nature and character of the village settlement. We therefore propose additional text to SC1, 5.C as follows:</p> <p>C. The site is not one generally recognised as contributing significantly to the nature and character of the settlement, in terms of quality rural landscape or statutory landscape designation; and development is of a scale and type which complements the character of the existing settlement;</p> <p>Additional justification could be added as follows: "the safeguarding of recognised landscape, habitat and wildlife, environment or designation (e.g. AONB), and related settlement character."</p> <p>2. An additional bullet point is proposed, consistent with change proposed to SC1 5.C:</p> <p>"4. E: The site is not one generally recognised as contributing significantly to the nature and character of the settlement, in terms of quality rural landscape or statutory landscape designation; and development is of a scale and type which complements the character of the existing settlement;</p> <p>It is noted that affordable housing is covered under both SC4 and OC1 (2nd bullet), and it is</p>

	recognised that the two policies can be applied in a complementary and/or mutually effective manner to deliver affordable housing while protecting landscape and designation.
Bicknoller Parish Council	Endorses the responses made by Stogumber and Crowcombe Parish Councils summarised above including the additional points made by Crowcombe Parish Council.
Clatworthy Parish Council	Expresses support for the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
Dunster Parish Council	A buffer zone must be kept between Dunster and Minehead All buildings at Dunster Marsh on the north side of the A39 are in the flood plain Land between the A39, Marsh Street and Marsh Lane is prime agricultural land.
Stogursey Parish Council	<ol style="list-style-type: none"> 1. Stogursey Parish Council supports the comments made by Stogumber and Crowcombe Parish Councils with the exception of Amended Policy SC4 1.D. We believe this should mirror B and C “Elsewhere on sites of 5 or more dwellings”. 2. With particular reference to Stogursey Parish, and notwithstanding the planning protection afforded by the proposed new nuclear development, the Council wishes to make the following observations: 3. The surrounding landscape settings of the ANOB and Exmoor are a crucial and intrinsic element of the beauty of the whole. This is especially important in an area that relies so heavily on tourist income. 4. It is agreed that some development is necessary to maintain the vitality and sustainability of the settlements in the surrounding landscape. 5. The nature and style of the development is, however, of the greatest importance. 6. Development should be proportionate, local to settlement boundaries, economically and environmentally sustainable and planned to encourage young families and local residents to settle. 7. The distinction between social and low-cost housing should be clarified and be consistently applied. 8. Should boundaries be altered, relaxed or dispensed with then the criteria for giving any development permission should be unequivocally clear and absolutely enforceable. 9. Stogursey Parish Council is not assured that the criteria of sustainability to be applied by West Somerset Council are necessarily strong enough to withstand the challenge either of initial planning application or of appeal, especially in view of the Council’s financial position. 10. It is therefore essential that criteria in policies are clearly defined. 11. In open countryside dotted with settlements with no planning boundaries, development pressure is likely to be considerable. The Parish Council is concerned that without settlement boundaries it will be impossible to resist inappropriate development, particularly now that a presumption in favour of all and any development is currently the law. 12. If the beauty of West Somerset is not to be incrementally eroded, Stogursey Parish Council would either like development boundaries to be retained, or that the criteria for assessing whether development proposals are acceptable should be made very much more stringent than currently proposed.
Old Cleeve Parish Council.	<ol style="list-style-type: none"> 1. SD1 – Sustainable development needs to be clearly and concisely defined. 2. SC1 Hierarchy of Settlements – clarification is needed on the inclusion of Blue Anchor as a Secondary Village. There are two parts of Blue Anchor, one at each end of the Blue Anchor Bay, one in Old Cleeve which has a pub, the other in Carhampton with a garage and railway station. Neither has a village hall or shop. 3. What is the status of hamlets – ie: Bilbrook, Hungerford, Five Bells etc. 4. SC2 Housing Provision – concern is raised over the delivery rate, would prefer a more even phasing of development across the planning period. 5. SC4 Affordable Housing – The threshold for affordable housing in Minehead should be the same as for in Watchet and Williton. 6. LT1 Post 2026 Key Strategic Development site at Cleeve Hill, Watchet – the coast road must take priority over development at this location.

	<p>7. SV1 Development at Primary and Secondary Villages – Hamlets should be defined.</p> <p>8. OC1 – Open countryside development – the amended policy may unduly restrict some eco-tourism enterprises which might be of benefit to the area.</p> <p>9. TR1 Access to and from West Somerset – this section is aspirational rather than deliverable.</p> <p>10. NH10 securing high standards of design – Policy is welcomed but clarification needed on “small domestic applications”, does this mean application to the planning authority, or application of design principles in construction.</p> <p>11. Page 6 Bullet 2.4 – pinch points at Williton, Washford, Bilbrook and Carhampton should be added.</p> <p>12. Without highway and infrastructure improvements the Parish Council does not consider any of the development at Williton or to the west will be sustainable.</p> <p>13. Many areas of countryside adjoining our small towns and villages whilst not of national importance legally are cherished by local people for their beauty and recreational value. The incursion of aggressive and insensitive development is much resented by many communities.</p>
Brushford Parish Council	<p>1. Brushford is pleased to be categorised as a Secondary Village in policy SC1.</p> <p>2. The Parish Council noted no distinction between the numbers of houses to be provided at Primary and Secondary Villages, the total number being expressed “as a whole”. The plan should be amended so that the numbers of new dwellings for each settlement in these categories are specified.</p>
	Voluntary bodies and organisations
Royal Society for the Protection of Birds.	The principles of the new policy NH10 are supported, where significant new development is proposed we recommend the application of the protecting and enhancing biodiversity policy from the Exeter Residential Design Guide (and the policies of the guide in general). This policy has the potential to be applied to all development, not just residential.
Transition Minehead and Alcombe.	<p>Wished to stress the sustainability and future proofing needed in the design brief</p> <p>Affordable housing is needed urgently developers must be made to comply with the policy for provision of affordable housing and be prevented from proceeding if they do not.</p> <p>Encouragement should be given to Co-operative housing projects if possible.</p> <p>Energy efficiency: New builds and conversions should either provide or be technology-ready to take and use domestic renewable energy (eg: PV on roofs, car charging points). Mains gas must be provided for the new housing on the south side of the A39, which should also be provided for existing development in the vicinity. Direct electric space heating should not be allowed however good the insulation is deemed to be.</p> <p>Permeability and Transport: footpaths should be provided throughout new development sites, be multi-use and wide enough for cyclists, buggies etc. to use at the same time.</p>
Stuart Robinson Planning case officer for Woodcombe, Minehead Conservation Society.	<p>SD1 represents a regrettable weakening of planning safeguards.</p> <p>SC1 - The amendment of “Minehead” to “Minehead/Alcombe” is supported.</p> <p>The source of demand for the 2,900 dwellings is questioned, as is the increase from 2,500. Lack of employment opportunities in Minehead either now or in the future, suggest that Cannington, Williton and Stogursey would be better locations for a higher proportion of the new homes due to their closer proximity to employment provision.</p> <p>SC4 – with a ratio of 1 affordable to two market houses, who will buy the market houses if the substantial number of affordable houses are to be delivered?</p> <p>Retirement accommodation and elderly people are increasingly dominating Minehead, overstressing the services for this part of the community, they should be encouraged to live more evenly distributed across the rest of Somerset. This problem is exacerbated by the lack of employment opportunities in Minehead, which is also likely to result in the purchase of new homes for rent or as second homes.</p> <p>Development limits should not have been deleted, this is a retrograde step because they offer valuable protection for property purchasers. Also it is important to protect the landscape around the town for its tourism value.</p> <p>MD2 – the proposal for 750 dwellings has many disadvantages. This development cannot help minimise the risk of flooding as the additional surface water runoff will be considerable. It should</p>

	<p>be drained to the east not to the south. It is not within easy walking distance of the main shops and so will increase car use within the town where car parking is already inadequate. The development of attractive land on the edge of Minehead will make it less attractive to tourists, the protection of Minehead as a "Tourist Attraction" should be treated as the Plan's priority.</p> <p>The deletion of the sites at Dunster Marsh is supported because it is high quality agricultural land, is liable to flood and car use would be required to reach basic facilities making the site unsustainable.</p> <p>The green gap should be maintained between Dunster and Minehead to preserve open countryside.</p>
Graham Sizer Minehead Chamber of Trade	<p>The issues of the extent and boundary of Minehead Town Centre and whether it should be extended, enabling traders outside the current policy boundary to be included in any outside funding or investment opportunities has recently been raised. Members feel that although Minehead has developed over the centuries in a linear fashion contrary to normal towns, it doesn't necessarily mean that the traders outside the current centre are not adding more significantly to the vibrancy of the whole town by acting as 'conduit' traders than in normal towns.</p> <p>The Chamber needs to flag this issue up as part of the current consultation exercise. It may well be beneficial for shop property owners, not necessarily the traders themselves, to be left out of any rule that reduces their ability to change use, and as the indications are pointing to a contraction of shops in the face of modern shopping trends, we have two contrasting views. My request needs some scrutiny, and that scrutiny needs considerable debate, especially in the light of the emerging relaxation of changes of use.</p>
Minehead Conservation Society	<p>Object to the increase from 2500 to 2900 dwellings in the Plan, which is not properly supported by evidence.</p> <p>Objection is made because:</p> <ol style="list-style-type: none"> 1. there are no major employers in the area other than Butlins. Who are these additional 400 dwellings being built for? 2. With the lack of employment some choose to commute to larger centres. 3. Given the constraints which affect Minehead (flooding, proximity to national park, high grade agricultural land and landscape) the Society believes that the Plan should retain the original requirement of 2500 dwellings and reserve any increase for the 20 year plus timescale. 4. The Council is putting financial gain before the historic environment and landscape quality of the area. This flies counter to the Council's stated aim of promoting tourism. 5. Most new houses will be occupied by retired people from outside the area bought as second homes or to rent. Locals will not be able to afford them as most local jobs are low paid. 6. There are many houses currently on the market in the area, especially flats and retirement properties. If more are to be provided they should be spread more widely across the area. 7. The allocated site will provide only 750 of the dwellings recommended for the town, where will the rest go? Calls into question why the Council is advocating 400 more dwellings than it needs to provide. 8. The Council should seek a more centrally situated location for major development with better road links, that is closer to the M5, is not a tourist destination and that has room for expansion. Only then can Minehead's position as prime attraction in the area be safeguarded. <p>Dunster Marsh: The removal of the sites identified at Dunster Marsh is welcomed because:</p> <ol style="list-style-type: none"> 1. They were in the flood plain 2. It is high quality agricultural land . 3. It has no facilities locally 4. The attractive entry into Minehead would be damaged 5. The gap between Minehead and Dunster would be narrowed. 6. It would spread development into the open countryside contrary to the Plan's policy OC1. <p>Settlement Boundaries: Objection is made to the removal of settlement boundaries because:</p> <ol style="list-style-type: none"> 1. This removes the protection for the countryside that they offer.

	<ol style="list-style-type: none"> 2. It is essential for house buyers to know exactly where the line lies. 3. The setting of development limits involves an assessment of the landscape value and setting of each settlement to ensure that it is adequately protected from unwarranted development. 4. The Council's definition of a built up area (page 19) is difficult for a lay person to fully comprehend and interpret, whilst making it easier for planners to permit development in conflict with their plan's landscape protection policies. 5. The Council argues that to re-assess development limits would delay the plan too much, why cannot they remain as they are? This exercise could have been undertaken a long time ago. 6. The Plan's policies have been changed and presented as a fait accompli quite suddenly without giving local residents a genuine say. <p>Design: Welcome the new government requirement for a design policy, but it needs applying more rigorously, with definite requirements to use local materials so that new development blends seamlessly into the existing landscape. The following amendments are requested:</p> <ol style="list-style-type: none"> 1. "New development should complement but <i>not seek to mimic existing development and should be of its time</i>. The Council will <i>encourage a contemporary approach to new designs</i> which respect and respond ----- materials." 2. Reference should be made to new development "building upon the best practices of the past". Rainwater harvesting for example is a traditional technique, as are basements. The main Minehead site slopes, two storeys above and one below ground would work well, lessening the impact of the development. 3. Pavements and roadways should be made of porous materials. 4. Good quality landscaping should be required. 5. Poor fenestration is a particular problem with many new build properties, the issue must be addressed. <p>Historic Environment: support is expressed for policy NH1, the Society would welcome the drawing up of a local list of important heritage buildings in collaboration with the Council.</p>
National Farmers' Union.	<ol style="list-style-type: none"> 1. Policy EC11 – concerned with the focus on "local food markets", the policy should recognise the importance of developing a strong supply chain throughout the District which supports the agricultural sector, the policy should be rephrased to read "the development of food markets". Issues relating to local marketing of food apply to only a very small proportion of farmers. 2. There should be an additional policy on the development of on farm diversification which helps to sustain the agricultural business. <p>The NFU suggests principles to help the Council to shape planning policy for the area. These are:</p> <ol style="list-style-type: none"> a. Food security is a crucial issue for now and the future and any actions must ensure that we do not compromise our ability to feed ourselves b. We should look to increase farm productivity and decrease impact on the environment. c. The achievement of sustainable development in rural areas through the integration of environmental, social and economic objectives. d. Meet the needs of a diverse rural population and ensure equality of opportunity. e. Maintain and enhance the areas natural asset base. f. Farmers and landowners should always be consulted and listened to with regard to developing the area. g. Support sustainable growth in the rural economy. h. Sustainable farming will support the wider community. i. Not one system of farming is the answer and all should be supported for maximum benefit to society and the environment j. Encourage links between rural areas and urban centres.
West Somerset Labour Party	<ol style="list-style-type: none"> 1. Withycombe should be included as either a primary or secondary village, there was a Community Land Trust proposals a while ago, and some limited development could be helpful. 2. "Limited Development" p18, future difficulties could arise if the definition were to be applied

	<p>without flexibility. It could prevent the delivery of an affordable housing scheme which often need to be of 10 – 12 dwellings in order to be viable for Registered Providers to deliver.</p> <ol style="list-style-type: none"> 3. Inclusion of Dunster Marsh as a secondary village (p17). No sizable development is likely in the old part of Dunster to the south of the A39. More development should be considered at Dunster Marsh to maintain the greater settlement's balance and support facilities such as the school. (they are aware of the outstanding planning permission at Higher Marsh Farm). 4. Affordable housing (p23) Regret is expressed that affordable housing will only be provided on sites of three or more dwellings, could two or more dwellings be used instead? 5. Providing low cost housing – sufficient flexibility should be provided for various types of tenure and funding mechanisms. There is considerable local interest in community land trusts and other co-operative models. 6. Rural exceptions policies – it is hoped that the council recognises the potential that these have to satisfy many of the strategic aims outlined in the draft and will act as a facilitator with land owners and housing providers. 7. Transport (p55) because of recent bus service reductions, all possible support should be given to efforts to provide alternative services, eg: by community transport undertakings.
Housing Associations and Registered Providers.	
Magna West Somerset Housing Association	<p>It is considered that the revisions do adequately address the changes in the NPPF.</p> <p>Specific comments:</p> <ol style="list-style-type: none"> 1. We think it is preferable to identify key strategic sites to help deliver the increased housing requirement and the choice of preferred sites appears logical and reasonable. A master plan and/or design brief should be undertaken on each key strategic sites to avoid piecemeal development. Where developers are unwilling to do this the Council should consider commissioning such work itself. In this context we welcome the New Policy NH10 - Securing High Standards of Design. It may be worth considering guidance such as Building For Life - www.designcouncil.org.uk/Documents/Documents/OurWork/CABE/Building%20for%20Life/Building%20for%20Life%2012.pdf 2. Policy SC1 - Hierarchy of Settlements. The distinction between primary and secondary villages would be helpful when considering potential new developments. 3. Policy SC2 & SC2A - We agree with increasing the housing requirement to 2900 based on the latest available evidence. We also agree with the figures for the key strategic sites as this provides greater clarity for developers. 4. Policy SC4 - We draw your attention to our prior comments regarding this policy which are attached and highlight the following: <ol style="list-style-type: none"> a. Regarding item 3A, it would be preferable to refer to housing needs data rather than surveys as there are several other ways of assessing housing need apart from surveys. b. We note the reduction from Code for Sustainable Homes Level 4 to Level 3 and continue to support this. c. • Item 4 - we note the alteration of the affordable housing proportion from 1:3 to 35% but feel this should be higher than on 'standard' section 106 developments, perhaps 50%. Otherwise, 35% may be provided as the norm rather than the exception.
South West HARP Planning Consortium.	<ol style="list-style-type: none"> 1. National Planning Practice Guidance (NPPG) - this is likely to be in operation before the adoption of the Local Plan, it should therefore also be borne in mind in drafting the publication version. 2. Housing Standards Review - references to eg: Code for Sustainable Homes, water efficiency and design standards are likely to be affected by the implications of the Housing Standards Review, in particular, evidence would need to be provided to justify the application of higher standards in a particular area. 3. SC2 Housing Provision – the increase to 2,900 dwellings is welcomed. Careful justification will be needed for the use of a local SHMA review to define the objectively assessed housing need, following guidance in the draft NPPG and proceedings in a number of current examinations over meeting HMA wide needs, evidence of cross boundary working is essential. <p>They would note the need to justify the 2,900 figure based upon the differences between housing need estimates based upon population, and the other factors identified within the</p>

NPPG such as affordability and market signals, under/over supply, migration trends, employment growth and localised factors such as demographic structure and significant development projects.

4. SC2A Strategic Development Distribution – Concern expressed at use of annualised averages which are too inflexible, and may cause problems with viability especially on marginally viable schemes. They would suggest using cumulative percentages for housing delivery over the plan period backed up by monitoring.
5. SC1 Hierarchy of Settlements - The further demarcation of settlements within the hierarchy is to be commended. Specific points of concern are:

'Limited Development' – whilst recognising that policy should indicate developments will only be permitted at the appropriate scale for the settlement, the use of a percentage above existing dwellings is restrictive, and the percentage selected arbitrary. The appropriateness of a development proposal should not be limited by such an arbitrary constraint but assessed, as indicated in para 58 of the NPPF, on factors such as its functionality and contribution to the area, sense of place and responding to the local character and site constraints such as topography. West Somerset have noted these criteria in policy NH10, discussed below, and we believe it more appropriate and in line with the objectives of the NPPF to use this policy to assess the appropriate scale of development proposals.

'Close Proximity (within 50 metres)' – in relation to the above point, a strict limitation on distance should not be applied but the judgement of close proximity should be assessed in relation to an interpretation of the 'well-related' criteria within policy SC1 and policy NH10.

1.5(D) – we would note caution on the wording of this criteria. As acknowledged by the NPPF and NPPG, the issue of traffic within rural areas is significantly different to urban areas with the "opportunity to maximise sustainable transport var(ying)ies". It is thus inevitable that development will occur in some areas of the district not easily accessible via foot, cycling or public transport but will require reliance on the car. Without an understanding of what 'significant' in the context of this policy means, it creates uncertainty to developers. The NPPF also increases the test of traffic impacts, adding that an application can only be refused where "the residual cumulative impacts of development are severe" (para 32). Thus indicating that a policy indicating refusal due to significant impacts alone would not conform with national planning policy.

6. Policy SC4: Affordable Housing - The increase in the threshold on affordable housing contributions is welcomed. Concern is raised that no affordable housing viability assessment has yet been undertaken, particularly in the light of the inflated market of second homes and holiday accommodation and the high levels of affordable housing indicated in the SHMAs. A viability assessment should explore the potential to increase the affordable housing requirement of 35%.

The criterion of nil-cost to the registered social landlord should be removed, it is not reflective of current funding mechanisms or development arrangements between RPs and market developers.

The inclusion of an exception site policy accords with national planning policy, this should be set out as a separate policy for clarity. There is a concern about the strict limits placed on ratios of market to affordable housing which is required on these sites.

A second consideration is the use of these sites to deliver community benefits, notably infrastructure. Given the decision by the Council to not progress CIL at this time and the forthcoming limitations to be placed upon the pooling of s106 contributions, the ability to deliver infrastructure will depend on the s106 contributions of significant development sites. The exception site policy has the potential to deliver a number of key sites across the district over the plan period. Where such proposals could deliver a significant community benefit which could otherwise not come forward, allowances should be made to increase the ratio of market housing to cover the cost of the community benefit and affordable housing to ensure the development remains viable.

7. Policy SV1: Development at Primary and Secondary Villages: - We are supportive of this policy and the addition of the criteria focusing on design. This fits well with the general design policy NH10. The reference to development at "a level appropriate to their role and function" is acceptable, and in line with the national requirement to respect the local character. We note within the assumptions that there is again a reference to limiting development based upon a

	<p>percentage of the existing dwellings. Subsequent to our above comments, we would request this reference be removed.</p> <p>8. Policy EC5: Safeguarding Existing Employment Uses - We are supportive of the amendments to this policy.</p> <p>9. Policy EC6: Work/Live Developments - The inclusion of this policy is to be commended and represents significant forward thinking in comparison with other LPAs. We have a concern with the criteria which indicates that the 'work' element forms a majority of the total gross floorspace. We do not believe this is reflective of current economics nor the changing nature of working from home. While more space intensive work units such as workshops or work units requiring storage would meet this requirement, there is the potential that some work/live units would comprise of a formal office area, attached to a larger family home. Evidently, in this circumstance it would not be correct to require the work unit to be greater than the total gross floor space of the development.</p> <p>10. Policy NH10: Securing High Standards of Design - We are supportive of the inclusion of a design policy; in particular its emphasis on local characteristics and site and surrounding constraints, which as we identify above, are the key issues that should dictate the appropriateness of proposed development.</p> <p>11. Site Allocation - We are supportive of the Council's decision to allocate the key strategic sites for the immediate plan period and the period post 2028.</p> <p>12. A specific policy should be included for the provision of specialised accommodation for older people such as the following:</p> <p style="padding-left: 40px;">"The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations.</p> <p style="padding-left: 40px;">The Council aims to ensure that older people are able to secure and sustain their independence in a home appropriate to their circumstances and to actively encourage developers to build new homes to the 'Lifetime Homes' standard so that they can be readily adapted to meet the needs of those with disabilities and the elderly as well as assisting independent living at home.</p> <p style="padding-left: 40px;">The Council will, through the identification of sites, allowing for windfall developments, and/or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities."</p> <p style="padding-left: 40px;">Pg. 13, Housing in Later Life Toolkit, December 2012</p>
	Housebuilders and other private developers.
Summerfield Homes	<p>The Strategic Housing Market Assessment update is not available so no updated comment can be made on the housing requirement.</p> <p>No up to date Sustainability Appraisal is available for the plan, the last having been published in 2010 in relation to the Options Consultation.</p> <p>The absence of these key up to date evidence items, and the increasingly out of date suite of documents forming the evidence base in our view make it difficult to comment on the housing requirement and the distribution between the main settlements, and render it unsound particularly in terms of justification.</p> <p>Key Issues are generally supported, more detail should be provided on the impact of Hinkley Point C project on the housing market.</p> <p>The Strategic Objectives should refer to a step change in the delivery of all types of housing, not just affordable housing.</p> <p>SD1 – is supported</p> <p>SC1 – general support expressed for the hierarchy of settlements, however the distribution of development is considered to be inconsistent with the hierarchy.</p> <p>SC2 and SC2A – The increase in housing provision is welcomed, but it is still maintained that in the absence of a fully updated SHMA a figure closer to 3,800 would be more appropriate. There is no evidence based justification for the 2,900 figure provided for in the plan in terms of eg: housing market data regarding historic trends in demand and the likely increase in demand arising</p>

from the Hinkley Point C project.

Their previous representations on the housing figure were re-iterated.

The housing need identified in the 2008 SHMA is more appropriate in reflecting the actual level of housing need. The alternative options for providing more housing should at least be assessed, there is no evidence that these options have been properly considered beyond the 2008 SHMA. In proposing a lower figure the draft plan is unjustified, contrary to the NPPF and serves to restrict the release of land for housing, particularly in the flexible and responsive fashion envisaged by the NPPF.

Concern is expressed at the lack of interim sites for early release, and the phasing of some sites towards the end of the plan period. The backlog of need is not addressed and neither is the five year housing land supply.

The Council has not yet provided an Infrastructure Delivery Plan as part of its evidence base which is also a concern.

Objection is made to the distribution of dwellings proposed which should provide for more development at Watchet and Williton as opposed to Minehead and the smaller settlements which are generally unsustainable locations for anything other than very small scale housing. In particular Watchet and Williton are better accessed than Minehead in relation to the wider highway network and are better related to Hinkley Point.

The absence of policies for the location of non-key strategic development sites creates a void of uncertainty for developers particularly in the absence of development boundaries.

SC3 and SC4 – Generally supported, actual proportion of affordable housing should be negotiated and agreed on a site by site basis.

SC5 – policy is supported.

SC6 – Policy is supported.

MD2 – The identification of a substantial amount of housing at Minehead is supported but too great a proportion of the overall provision is made at Minehead. The removal of development at Dunster Marsh is also supported.

WA1 – the provision for development at Watchet is supported although the overall provision there should be larger. Clarification needs to be provided about where the balance of non-allocated sites will be provided within the three main settlements.

WA2 – the proposed strategic allocation at Parsonage Farm does not appear to have been assessed or identified through the SHLAA. The proposed allocation would present significant access and landscape constraints. This is not the most appropriate site when considered against reasonable alternatives and so would fail the Justification test of soundness. Summerfield controlled land at Liddymore Farm and Doniford Road together form a more appropriate alternative to this site and have the same capacity. These sites are suitable and available. There is no evidence that the Parsonage Farm site is preferred to these other sites in the evidence base, so also failing the test of soundness. No proper testing of alternative options seems to have taken place. Transport and ecology reports are appended suggesting that the village centre would be more accessible than from Parsonage Farm and that there are no ecological constraints to development on the alternative sites.

W11 – the identification of a requirement for substantial additional housing at Williton is supported, although it should not seek to limit it to 406.

W12 – Response based on the Summerfield response to the Draft Williton Masterplan 2011 it being assumed that the W12 allocations have been made on the basis of that document. The comparative assessment of sites in that process is criticized. Any local plan allocation based on Appendix D of the masterplan will clearly fail the test of soundness.

Flood risk and archaeological issues as well as access issues suggest that insufficient attention has been paid to development constraints. Land to the East of Williton presents good pedestrian and cycle access to the village centre, the majority of the land is in flood risk zone 1 and therefore not at risk from flooding. There is no overriding ecological or landscape impact constraint affecting development of the land to the east of Williton.

The Revised Preferred Strategy has introduced sites which were not included in the SHLAA assessment or the Williton Masterplan process. Strong disagreement is expressed as to the assessment of the proposed Key Strategic Sites for Williton and their linkage to the village centre in particular. An appendix is attached setting out the relative advantages of their site to the east of

	<p>the Village. In particular it is asserted that suitable access can be achieved to the land controlled by Summerfield Homes. A paper is also appended setting out the relative landscape impact advantage to the eastern option as opposed to the allocated sites.</p> <p>Notwithstanding the Bat consultation zone, an ecological report asserts that there is no overriding ecological constraints to development.</p> <p>It is asserted that the proposed strategic sites at Williton are unsound as they are not sustainable, not based on proper evidence and not the most appropriate strategy when compared with reasonable alternatives. There is no evidence of any sound testing of alternatives.</p> <p>EC1 – support expressed for the objectives of the policy.</p> <p>TR1 and TR2 – Broad support expressed for the objectives of these policies which reflect national policy. All of Summerfield Homes sites mentioned above could contribute towards these aims and objectives.</p> <p>CF1 - Broad support expressed for the objectives of the policy. All of Summerfield Homes sites mentioned above could contribute towards these aims and objectives.</p>
<p>South West Strategic Developments and Mr. & Mrs. A Ross</p>	<p>Q1 – No, not fully, without inclusion of the changes set out below the plan is considered to be unsound.</p> <p>Q2 – SD1 Presumption in favour of sustainable development - The Government is seeking to cut down and simplify planning policy. The NPPF exemplifies this, but the re-wording to Policy SD1 is completely to the contrary; it is overly prescriptive and unnecessary. The policy should be revised to read:</p> <p><i>'Proposals which help to deliver sustainable development through the application of the policies and proposals of the Local Plan and/or the NPPF will be supported'</i>.</p> <p>SC1 Hierarchy of Settlements - We support the identification of Watchet as a rural service centre and a focus for new development. However, The Plan is overly prescriptive on other settlements and the proposed changes do not reflect the need for flexibility in development provision and services required by the NPPF. The NPPF does not advocate the restriction of development purely to areas where local need is demonstrated, and reference to this should be removed.</p> <p>SC2 Housing Provision - the validity of the housing evidence is questioned. At the point of writing the updated SHMA was not publicly available and consequently it is impossible to verify or comment on the accuracy of the stated 2,400 figure. Assuming this figure is correct then a generally median approach of 2,900 units as advocated by The Council would seem logical, but until the updated report is fully available as part of the Evidence Base this cannot be determined. There may be flaws in the revised SHMA that mean the baseline figure of 2,400 is actually closer to 2,700, which in turn means the median point between the former RSS 3,800 figure and the updated report would actually be far higher. The reliance upon the lower updated figure is unsound as the revised SHMA is not a full part of the Evidence Base. The matter of housing numbers cannot be adequately consulted on until the SHMA update report is available. Until then the Plan must relate to the most recent objectively assessed figure which is 3,800, in which case the numbers in subsequent policies need revising upwards.</p> <p>SC2A Strategic Development Distribution – notwithstanding the above, support expressed for focus of development being at Minehead/Alcombe, Watchet and Williton. The policy should not be expressed using annualised averages as this depends on market conditions, land owner intentions etc. The figure for Watchet should also increase if the overall requirement is increased.</p> <p>SC4 Affordable Housing – the requirement for affordable housing needs to be balanced with the viability of development to provide it an unrealistic expectations could stagnate development in the area and should be avoided. The NPPF requires flexibility to take account of varying market conditions. The requirement for a ratio of 65% - 35% is not evidenced will result in stagnation of delivery, this kind of aspiration has often been successfully challenged on viability grounds.</p> <p>Such a ratio sends out a negative message to developers who are likely to invest and build elsewhere reducing supply of new affordable housing locally even more. Taunton Deane's original Core Strategy required 30% affordable housing whereas the adopted document to 2028 is set at 25%. This percentage, set through examination is actually bringing forward affordable housing units. This Local Plan's well intentioned approach is counter-productive, the percentage should be changed to 25%.</p> <p>WA1 Watchet Development - the requirement for development to 'contribute towards resolving the flood risk issues which affect the settlement' is unsound as this is contrary to the need for contributions from development being specific to that development site. The reference to</p>

	<p>Watchet development contributing towards resolving the flood issues of the rest of the town should be removed, we do however accept that this matter is governed by CIL.</p> <p>The wording for Williton under Policy WI 1 is different – ‘<i>where appropriate, development must contribute towards resolving the flood risk issues which affect the settlement</i>’. The Plan is inconsistent with wording between the two settlements which could create bias in locational development due to additional costs, and therefore not establish a balanced development pattern. Williton would most likely be the preferred option as a focus for development over Watchet as, if the Local Plan was adopted as currently worded, it would have lower development costs. Both references should therefore be removed and dealt with by CIL where necessary.</p> <p>The reference to ‘<i>complementing the provision of employment opportunities, services and facilities in Williton</i>’ is both ambiguous and difficult to demonstrate. It is noted that a similar requirement for Williton’s developments to complement Watchet’s employment and facilities is conspicuous by its absence, and The Plan is therefore inconsistent in this respect. Clearly any residential development in either settlement will reinforce employment and services provision in both settlements, so the requirement is unnecessary and should be removed.</p> <p>The proposed wording that protects the long term interests of the West Somerset Railway (WSR) is supported. The railway is the longest heritage railway in the UK and a valuable tourism asset supporting substantial number of jobs locally, both directly and indirectly. The protection of land for its future realignment is essential.</p> <p>WA2 Strategic Development Allocation at Parsonage Farm, Watchet – Objection is made to this allocation, and to the lack of identification of land to the east of Watchet for residential development. Land to the east of Watchet should be allocated instead of Parsonage Farm because:</p> <ul style="list-style-type: none"> • Watchet has already grown toward the east (Normandy Avenue); • It forms a suitable community with Normandy Avenue; • A school is located in the eastern boundary of Watchet and residential development adjacent to it is highly sustainable; • Significant development will be required in the eastern area anyway to support the future of the railway, and rather than develop two areas around Watchet it would be more sustainable and indeed logical to focus is solely on the east side and support the railway; and • The realigned railway will provide a clear boundary to contain the urban area to the east; and • The eastern side of Watchet is less visible and sensitive in landscape terms. <p>Reference to Parsonage Farm as the key development site for Watchet should therefore be removed and replaced with land to the east of Watchet.</p> <p>LT1 Post 2026 Key Strategic Development Site – support provision of sites for beyond the plan period at Cleeve Hill. The logic is similar to that favouring land east of Watchet, although the latter should be brought forward first, Cleeve Hill second and Parsonage Farm last.</p>
Gladman Developments Ltd.	<p>Comments restricted to: housing requirement, evidence base, spatial strategy and proposed housing policies.</p> <p>Housing Requirement, Evidence Base -</p> <p>West Somerset is located within two Housing Market Areas, both had comprehensive studies carried out but these are out of date. The council has only updated evidence in relation to the Northern Peninsula HMA and that only within its own boundary. The NPPF requires Councils to plan in the context of the full objectively assessed need for their areas, this requires that both SHMAs be up to date.</p> <p>The initial findings of the Northern Peninsula SHMA update omits the backlog from the previous period, this lack of information leads one to assume that other key components are missing.</p> <p>The Government has recently issued a guidance note to local authorities in assessing and evidencing development needs for housing and economic development. This document supports and provides further guidance on the undertaking of such assessments, the following key points are highlighted:</p> <ul style="list-style-type: none"> • Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, infrastructure or environmental constraints. • Household projections published by the Department for Communities and Local Government

	<p>should provide the starting point estimate of overall housing need</p> <ul style="list-style-type: none"> Household projection based estimates of housing need may need adjusting to reflect factors affecting local demography and household formation rates which are not captured by past trends, for example historic suppression by under supply and worsening affordability of housing. The assessment will need to reflect the consequences of past under delivery and the extent to which household formation rates have been constrained by supply. Plan makers need to consider increasing their housing numbers where the supply of working age population is less than projected job growth, to prevent unsustainable commuting patterns and reduced local business resilience. If the historic rate of development shows that actual supply falls below planned supply, future supply should be increased to reflect the likelihood of under-delivery of a plan. Plan makers should take account of concealed households. <p>The Council does not have a comprehensive, up to date evidence base to determine its housing requirement. The Council must produce an updated SHMA for both of the HMAs in accordance with national guidance. The outcome should be used to determine the housing requirement as per para. 14 of the NPPF before being consulted upon at the pre-submission stage programmed for late 2013 / early 2014.</p> <p>Spatial Strategy -</p> <p>Placing too much emphasis on a small number of sites could result in a significant shortfall of housing against the five year requirement and the supply of homes over the lifetime of the plan. Housing should be distributed to a broader selection of sites which would still support the plan's strategy avoiding delays on sustainable urban extensions that are often more difficult to deliver.</p> <p>Policies –</p> <p>Support the inclusion of SD1.</p> <p>Support also give to the approach in SC3 for the on-site mix of housing sizes, tenures to be set to meet the demonstrated need of the area's communities rather than a blanket requirement in line with para. 50 of the NPPF. To ensure implementation, the Council must review housing need in both housing market areas and commit to regular updates.</p> <p>SC4 – the requirement of 35% of affordable housing is too high this will not attract developers to the area and may threaten the viability of schemes contrary to para 173 of the NPPF. An up to date and robust viability assessment must be provided. There is no justification of the 35% figure which appears to have been rolled forward from the Council's adopted Planning Obligations SPD.</p>
<p>McCarthy & Stone Retirement Lifestyles Ltd.</p>	<p>The Local Plan is considered to be positively planned with respect to housing for the elderly and we commend the Council for seeking to provide appropriate accommodation to meet the needs of its ageing population particularly within Policy SC3: Appropriate Mix of Housing Types and Tenures.</p> <p>Whilst recognising that it is outside the scope of the current consultation, it is suggested that the Council reword part of the "Purpose" section to encourage a variety of forms of specialist accommodation. Respectfully suggest amending "<i>To encourage the provision of lifetime homes/and a proportion of bungalows etc.</i>" to read: "<i>to encourage the provision of Lifetime Homes and a range of specialist accommodation for the elderly</i>".</p>
<p>Blue Cedar Homes Ltd.</p>	<p>Spatial Vision - Objection is made to the Spatial Vision, particularly that for housing (para 5.2) particularly the lack of absence of any specific reference to housing the meet the changing needs of the elderly which is critical for the District. The Spatial Vision should be amended to include reference to the provision of specialist, market housing for the elderly.</p> <p>SC3 Appropriate mix of housing types and tenures – generally supportive of the policy, however it should be amended further to encourage the provision of retirement housing. The issue of elderly people being over-housed in properties which no longer suit their needs should also be addressed. This would help create more balanced communities.</p> <p>SC4 Affordable Housing – Objection is made to the policy on the basis that the affordable housing requirement is too onerous and too high. Outside the main settlements, a requirement of 35% affordable housing on schemes of 3 or more dwellings will lead to new housing not being developed, so elderly people will continue to occupy family houses which are needed by younger generations. It is suggested that either the affordable housing requirement is reduced or the unit threshold be increased. The policy should also acknowledge that sometimes it may be appropriate to seek an alternative to on-site provision eg through an offsite financial contribution.</p>

David Croxton Ltd.	<p>Q1 –</p> <p>Re: p10, 4.4.2 Disparity...It is important, that when considering affordable housing, that consideration is given to district heating, and the benefits and security of a microgrid that would create local employment, retain the economic benefit in the local community, and be eligible for EU and UK Government support under Feed In Tariffs, Renewable Heat Incentive etc.</p> <p>Q2 –</p> <p>Directing development to Key Strategic Development Sites, where developers have already anticipated it, will create ongoing pressure for high density building and inflated site values. Many of our villages and smaller communities are already suffering from increasing average age of the population, with more and more youngsters having to leave the area to seek employment and more reasonable housing costs in order to achieve a decent future. It behoves us all to ensure that key development like this carries a higher percentage of affordable housing, linked with creating business initiatives that can meet a local demand for products. More consideration should be given to supporting the key industries of tourism and agriculture, whilst encouraging the development of local small scale renewable heat and power.</p>
Acorn Rural Property Consultants (for Thorne, Thorne and Doggrell).	<p>OC1 open countryside development – The justifying text should be amended to clarify the definition of open countryside in the context of the plan, eg: it should state that <i>“the open countryside includes all land that is not adjacent or in close proximity to major settlements, primary and secondary villages”</i> in order to be consistent with the draft policy itself.</p> <p>SC1 – amend ‘in’ to read ‘at’ in the first sentence of the policy for consistency with eg: SC2, SC2A and MD1. A definition of open countryside should be added to the justification as for OC1 above.</p> <p>MD2 and LT1 – concern is expressed at the likely adverse impact on the Exmoor National Park of the strategic allocation of land south of the A39. The release of land in this location should be strictly controlled. The emphasis of policy instead should be to prioritise development at other sites in close proximity to Minehead before looking south of the A39. A site is suggested for allocation for housing development between Porlock Road and Abbots Way / Home Meadow (plan enclosed).</p>
Landowners.	
The Crown Estate.	<p>The proposed changes to the Preferred Strategy are still in conflict with the NPPF, specifically para. 47 which sets out the government’s proposals to “significantly boost the supply of housing” so the approach is unsound.</p> <p>There is nothing on maintaining a five year supply of housing sites, no housing trajectory and no recent housing monitoring information is available. The need to maintain a five year supply should have been central to the selection of strategic sites, this process has not been followed, the site selection process is unjustified, ineffective and in conflict with the NPPF. This lack of information has made it difficult to respond to this consultation exercise.</p> <p>The Council should revisit the site allocations process, prepare a housing trajectory setting out what sites will contribute towards a deliverable five year supply and developable supply for the following ten years.</p> <p>The arbitrary threshold of 250 dwellings should be removed and consideration be given to other sites which could have a strategic contribution to ensuring housing delivery. The Dunster Marsh west landholding has such a strategic role to play alongside the existing consent at Higher Marsh Farm. A further 200 dwellings could be delivered there. The Council’s preferred strategic site at Minehead is likely to have a long lead time and not contribute to the five year supply of housing land.</p> <p>The Council’s housing evidence is incomplete and further justification is required. There is currently no evidence to demonstrate that the Preferred Strategy is deliverable, and without a five year supply of housing land the strategy’s policies are immediately rendered out of date and the plan ineffective (NPPF para. 49).</p> <p>The SHLAA should be updated, and a new AMR should be published. A housing trajectory is needed supporting a demonstrated five year supply of housing land.</p> <p>Land at Dunster Marsh west should be allocated for 200 dwellings alongside new community facilities.</p> <p>Policy SC1 – The reclassification of Dunster Marsh as a secondary village under SC1 is also rejected when considered within its context and access to higher order facilities (amend SC1 accordingly with Dunster Marsh added to list of main settlements).</p>

	<p>in terms of definitions, the inclusion of 10% and 30% thresholds in the definition of limited development are entirely arbitrary, inflexible and not justified in planning terms. This is contrary to the NPPF requirement for a plan being positively prepared.</p> <p>Policy SC2 – Housing provision – The proposed housing provision of 2900 is not adequately justified, particularly as the 2013 SHMA update was not published as part of the consultation. Therefore it is not possible to comment on whether the proposed level of provision meets the full objectively assessed housing need for the area. This evidence must be made available as soon as possible.</p> <p>Policy SC2A – Strategic development distribution - there is no evidence for the distribution in the policy. Justification should be provided in terms of the objectively assessed housing need for the area.</p> <p>Policy MD1 Minehead Development - the policy should be amended to include Dunster Marsh in the list of places in the policy.</p> <p>Policy MD2 – change title to: “Key Strategic Development Allocations around Minehead / Alcombe / Dunster Marsh”.</p> <p>Also, in order to assist with securing a five year supply of housing land, and the sustainable nature of the location, add in to the policy the following text:</p> <p>“WEST OF DUNSTER MARSH”</p> <p>“WITHIN THE AREA IDENTIFIED ON THE PROPOSALS MAP WEST OF DUNSTER MARSH AND NORTH OF THE A39 A MIXED DEVELOPMENT WILL BE DELIVERED INCLUDING:</p> <ul style="list-style-type: none"> - UP TO 200 DWELLINGS (or up to 50 dwellings), AND; - COMMUNITY FACILITIES”
E Murrell	<p>Minehead’s development boundaries need to be expanded to allow for present and future housing need to be met.</p> <p>Land between Higher Hopcott and the Fire Station is best suited to meeting these needs and the proposed allocation is supported.</p> <p>Not too much affordable housing should be accommodated within this area.</p>
Williams Partnership	<p>Comment is made specifically on policies SC4 and MD2</p> <p>SC4 Affordable housing - The policy’s threshold of 8 or more dwellings and 35% - 65% affordable housing ratio is too inflexible and would adversely impact upon the viability of development. This is only likely to be exacerbated by introduction of CIL. The policy is unsound being neither justified or effective. To remedy this, a more flexible approach is suggested seeking to aim for a specific level of affordable homes “subject to viability”. Provision for off-site delivery via contributions would also assist with deliverability.</p> <p>MD2 Key Strategic Development Site at Minehead / Alcombe – The policy is considered to be sound and is supported. It is the most suitable sustainable location for strategic growth of the town. There should however be a more detailed policy in a separate DPD in order to guide delivery.</p>
Mr C Shapland & Mrs J Mulis	<p>The 2012 response is reiterated, maintaining objection to SC2 and now also objecting to SC2A, to SC4, MD1 and MD2 and that neither the vision nor the key issues and objectives reflect the seriousness of the Council’s five year housing land supply position, its demographics or its affordable housing requirements.</p> <p>Q1 – The Council should:</p> <ul style="list-style-type: none"> • increase the housing provision in the plan in line with its own evidence • continue the focus of development on Minehead, identifying other development sites to provide for greater flexibility and improving the housing land supply situation. • Allocate our land at Woodcombe as part of the Local Plan’s strategy. <p>The soundness of the Local Plan is questionable in view of the uncertainty over whether the Plan’s allocated sites will be able to deliver the expected amount of housing. The previous consultation on general directions of growth was also contrary to the NPPF.</p> <p>Q2 – specific comments on policies</p> <p>The affordability problem is particularly severe in West Somerset in addition, the population is</p>

	<p>ageing reducing the numbers of economically active people in the population. These factors emphasise the importance of planning for a full and viable housing provision.</p> <p>Minehead is also severely constrained by the sea, flood plain, North Hill and the Exmoor National Park.</p> <p>Relevant local plan policies should be amended to:</p> <ul style="list-style-type: none"> • Make provision for a higher number of new homes in the district and in Minehead, in line with the Council's own evidence; • Identify other appropriate locations for housing development in and around Minehead in order to provide a greater range of development sites and thereby increase the flexibility of the proposed housing supply for the town and the district; and • Allocate our clients' land at Woodcombe, which adjoins the western part of the built up area boundary of Minehead, for strategic housing development especially bearing in mind that it is accessible, development could be accommodated there without significant visual impacts, and it would be well placed to provide green infrastructure linkages via the dedicated pedestrian Parks Walk, local buses at the end of Bratton Lane and cycle access on the old main Porlock Road.
Martin Lee	Requests that the allocation boundary of the submitted site for the LT1 Strategic site on the western side of Watchet be amended to reflect that shown on the corrected plan submitted.
Jill Martin	I would like my land in Williton, situated between Union Lane Williton and the West Somerset Railway Line, to be considered for development following the current consultation exercise.
Roger Plowright	<p>Policy SC1 – support expressed for the more explicit identification of a number of Primary and Secondary Villages where additional development will be permitted, more particularly, the identification of Stogursey as a primary village is supported. In a predominantly rural district the village provides a range of services and amenities and therefore it is correct that it is recognised as a location where development should be supported thereby increasing the sustainability and viability of local services and facilities, particularly in light of the likelihood of further development at nearby Hinkley Point.</p> <p>'Limited Development' equating to 10% - 30% depending on when development comes forward within the Plan period. Are there any baselines figures? How has the figure of 10% been justified?</p> <p>How is development in primary and secondary villages envisaged to come forward - is it through the development management process, neighbourhood plans or a site allocations plan?</p> <p>Policy SC2A - The annualised average of 30 dwellings per year in the primary and secondary villages seems low when one has regard to the fact that each settlement could grow by up to 10% early on in the plan period. With a chronic housing shortage this policy could limit the speed with which sites come forward.</p>
DJ Gliddon	<p>Agrees with the policies in economic assessment relating to low levels of wages in tourism and agriculture and need to reduce carbon footprint. The Council should also seek to increase retail activity.</p> <p>The new plan should help to address flood risk issues in Williton through contributions to flood relief measures in exchange for reduced social housing contributions.</p> <p>Land east of Williton is identified as the 'obvious' housing site for the expansion of the village. It is said to be well accessed by car, rail, bus, cycle and foot. It has low biodiversity value, it could provide part or all of a north – south link road between the A39 at Pondhead Cross and the A358 at Raglands Cross. It is most convenient for access to the village's existing facilities. Despite being in a proposed bat consultation zone, the light spill from existing development is likely to deter bats already. They could provide a new village hall, a cricket pitch, balancing ponds and woodland.</p> <p>Disadvantages of the proposed H1a site to the west of Williton are: that it is open countryside divorced from the settlement, it has no existing footpaths, biodiversity impact is likely to be severe because of its remoteness. Linkages to the shops are poor with significant road safety issues for pedestrians and cyclists. The separation of the development sites is likely to give rise to an undesirable 'enclave' mentality. It is a substantial new intrusion into the countryside, with greater negative impact than the site on the eastern side of the village.</p>
Agents for DJ Gliddon	<p>The NPPF</p> <p>To properly address the requirements of the NPPF, the West Somerset Local Plan to 2032 (WSLP) should be based on a sound and up-to-date evidence base (NPPF para 158) and take full</p>

account of market and economic signals. It should include policies that plan positively for sustainable economic development (para 16 & 19) and should be aspirational but realistic (para 154). The effect of policies must also not over-burden businesses (para 21). The NPPF also sets out particular requirements for delivering sustainable development. We do not consider that the West Somerset Local Plan as currently drafted does do this for the following reasons:

1 The evidence base is not sound in all respects, nor is it up-to-date on all matters. In particular we would suggest that the SHLAA is out of date and the retail study is unsound;

2 The Local Plan does not contain any policies to promote competitive town centres and customer choice, does not define town centres or primary shopping areas, or plan to meet the needs of retail uses in full (para 23); and

3 The current wording of a number of policies is likely to stifle sustainable economic development.

4 The housing land supply cannot be delivered as set out in Policy SC2A due to a conflict with policy SC1.

This is considered in more detail below on a Policy by Policy basis.

- The inclusion of **SD1** is supported
- **SC1 Hierarchy of Settlements** – the strategy is generally supported with the proviso that some shift of emphasis from Minehead to Watchet and Williton is required. This particularly relates to retail development needs where Minehead has an oversupply of floorspace. For sustainability to be maximised retail opportunity in the two smaller major settlements must be increased bringing increased prosperity and employment to the area.
- The definition of Primary and Secondary villages is supported. It is appropriate to define 'Limited Development' however, the proportion of growth should be altered to 35% for Primary Villages over the plan period. It is not agreed that the growth should be phased by allowing 30% growth in any five year period, such a restriction could unacceptably stifle development and not positively respond to the immediate issue of constrained housing supply for which the NPPF seeks redress. This 30% limit should be deleted.
- **SC2A** – an average of 30 dwellings per year are anticipated at the Primary and Secondary villages equating to 600 dwellings over the plan period. There are approx. 1,050 dwellings in the primary villages, which is where most of the growth in villages will need to be accommodated. If it is assumed that the PVs will deliver 500 of these dwellings, they will have to grow by 50% on average, this level of growth is not allowed by the current wording of policy SC1 allowing only 10% growth in PVs during the plan period, such a restriction would deliver only 105 dwellings. This policy as drafted renders the plan unsound.
- It is suggested that a more achievable figure in the larger villages is 400 dwellings, the remaining 200 should be allocated in Williton in a strategic site to the south east of the settlement.
- **SC4 affordable housing** - We would suggest that SC4, point 2 needs to be amended by the addition of *"unless it can be shown by the applicant that this will seriously impact on the viability of the development"*, to ensure that development is not rendered unviable by too onerous a requirement.
- **SC5 Self containment of settlements** – policy should be amended to seek improved range of services in settlements consistent with current and emerging needs. The existing offer in Watchet and Williton is inadequate and needs to be improved or the new development allocations will be unsustainable. It is suggested that the sum of strategic and non-strategic sites at Watchet and Williton amount to an additional 2,330 residents, 30% more than their existing combined population.

For a sustainable settlement to result there must be a proportionate increase in services including retail provision. It is proposed therefore that the J Gliddon & Sons site at Williton is allocated as a sustainable and sequentially preferable location for a new convenience store creating 150 additional jobs. The justification section of the policy should be amended to refer to Watchet and Williton as well as Minehead.

- **MD1 Minehead Development, WA1 Watchet Development and WI1 Williton Development:** The changes to the wording of these three policies will restrict sustainable development contrary to the NPPF. Requiring all development, regardless of scale, to support and strengthen the settlements' role (all) and maintain and enhance its attractiveness as a tourist development (Minehead and Watchet) and improve traffic and

transport (Williton) and complement employment provision (Watchet and Williton) is clearly inappropriate and unachievable in most cases.

It is suggested that the original wording seeking one or more of these aims is more appropriate and flexible. Development in a secondary centre should not be judged unsustainable because it has the added benefit of meeting needs of residents in the other secondary centre, reducing their likelihood of travelling further afield for these services.

Alternatively, the policies could be reworded to ensure that new development does not significantly harm the settlement's role and function.

- **MD2 Key Strategic Development Allocation at Minehead/Alcombe** - We do not consider that the minimum 3ha of land allocated for non-residential uses is consistent with the NPPF:

- 1 The wording of the allocation is too vague as to what uses are required;
- 2 As a result there is no evidence base to support a 3ha allocation; and
- 3 The current wording could allow a significant amount of development, such as retail uses which would harm existing town centres or other allocations, such as employment.

We would therefore suggest that this policy needs to be reworded to include specific information on the types of uses that could be included as part of the wider residential development and the quantity of space should be informed by the evidence base.

- **WA2 and WI2: Key Strategic Development Allocations at Williton and Parsonage Farm, Watchet** - in both of these policies approximately 3ha of land is allocated for 'appropriate and compatible' non-residential uses as part of the strategic housing allocations totalling some 900 dwellings. We do not consider this to be consistent with the NPPF because:

- 1 The wording of the allocation is too vague as to what uses are required;
- 2 As a result there is no evidence base to support a 3ha allocation; and
- 3 The current wording could allow a significant amount of development, such as retail uses which would harm existing town centres or other allocations, such as employment.

Our client recognises that the increase in population proposed through the strategic allocations at Williton and Watchet should be matched by improvements in the retail and employment offer, however, this should be located in more central sites such as J Gliddon & Sons site to the rear of Bank Street and Fore Street in Williton, which is well connected to the town centre. In contrast, the strategic allocations are not appropriate locations for non-residential uses.

These policies need to be reworded to include specific information on the types of uses that could be included as part of the wider residential development, and retail uses specifically excluded, given that a sequentially preferable site at J Gliddon & Sons (at Priest Street, Williton) exists, which should itself be allocated for retail use.

- **LT1 post 2026 Key Strategic Development sites** – Justification of these sites is questioned, there is no explanation as to why there are sites in Minehead and Watchet but not Williton, or why these sites have been considered preferable to others considered at previous stages of the plan preparation.
- **EC1 Widening and strengthening the local economy** – It is suggested that in light of the strategic objective of: "Developing the self-containment of Watchet/Williton", retail should be named as a key employment generating activity and explicitly promoted through draft policy EC1 which would comply with the NPPF. The importance of providing retail capacity locally is directly related to reducing trips to eg; Taunton and Bridgwater to access new retail floorspace in those settlements. Retail is the biggest employer by sector in West Somerset at 15.3% (2011 census) and should not be ignored by the Local Plan.
- **EC2 Major Employment Sites** - The current wording of the policy would allow significant retail development on these sites even if this resulted in significant harm to a centre. The policy is therefore not compliant with the NPPF. EC2 must be qualified as is EC3 to ensure that new development which would adversely impact on the vitality and viability of existing centres is not permitted.
- **EC5 Safeguarding Existing Employment Uses** – the policy should be amended to clarify whether the criteria are to be considered separately or cumulatively (ie: 'and' or 'or').

	<p>The policy should be strengthened to consider the viability of business uses generally rather than just the viability of the current business as the latter could result in the loss of employment land due to a badly run business.</p> <ul style="list-style-type: none"> • EC10 Gateway Settlements – The policy should not just apply to tourism developments, the word ‘tourism’ should be deleted in order to make it NPPF compliant. • TR1 and Policy TR2: Access to and from West Somerset & Reducing Reliance on Public Car - Whilst policies to encourage travel by non-car modes is welcomed (TR2), J. Gliddon & Sons consider that in the West Somerset situation, where it is acknowledged that car travel will remain important for many trips, opportunities to reduce the length of trip or the frequency of trips undertaken by car should also be encouraged. • CF2 – Planning for Healthy Communities – NPPF states that investment in business should not be overburdened by combined requirements of planning policy expectations. The requirement for a health impact assessment must be clarified, ‘major development’ must be defined and also that the nature of the HIA must be proportionate and appropriate to the scale and type of development proposed, this would bring CF2 in line with the NPPF. • Other comments – the word ‘development’ is sometimes used as a shorthand for ‘residential development’ which can lead to confusion, this needs to be clarified. <ul style="list-style-type: none"> - the 2006 Local Plan policies which are to continue to apply following adoption of this document should be listed in an appendix. - SD1 purposes repetition under ‘Economic’ sub heading of ‘right places’ - W11 Justification – we would question why the population figure quoted here differs from that at para 2.3 - W11 Justification, Bullet 3 – would suggest this needs rewording for clarity. - SV1 Justification – would suggest that this needs reviewing as it does not explain why development is required and appears to encourage further development for second homes/retirement homes. - OC1- we would suggest that a definition of ‘close proximity’ is included in the supporting text as is done elsewhere in the Plan. - OC1 – we would suggest the reference to ‘equestrian’ is changed to ‘equine’ to be consistent with the terminology used elsewhere.
Trustees of the Wyndham Estate.	<p>Policy SD1 - Presumption in favour of sustainable development - SOUND – This policy accords with paragraph 14 of the Framework which sets out the Government’s presumption in favour of sustainable development.</p> <p>Policy SC1 - Hierarchy of settlements - UNSOUND – This policy does not accord with paragraph 55 of the Framework which sets out the exceptions to development in the open countryside. It is also insufficiently flexible to meet the needs of the Districts rural settlements over the plan period.</p> <p>Concern expressed at the definitions of “limited development” and “small scale development” which place a cap on the amount of development each settlement will be allowed to receive during the plan period which is arbitrary. The approach is not based upon sound evidence and is contrary to para. 47 of the NPPF. Local need and the wider sustainability benefits should be considered for the settlement or the cluster of settlements concerned.</p> <p>The criteria in part 5 of the policy are too onerous especially E and F these are too onerous and should be change to accord with the requirements of para. 55 of the framework.</p> <p>The policy still fails to make provision for re-use of existing buildings in the countryside, a serious omission in view of the supply of such buildings in the area and the heritage value of their retention.</p> <p>Concern remains about the need to demonstrate good proximity and easy accessibility to the existing highway network or alternative transport modes. Which is considered to be contrary to paras. 29 and 34 of the NPPF which recognise that sustainable transport solutions will differ in urban and rural areas. Alternatives to the private car in West Somerset are limited.</p> <p>SC3 - Appropriate mix of housing types and tenures SOUND – This policy accords with paragraph 50 of the Framework which sets out the Government’s requirement to provide a mix of</p>

housing which reflects local demand and need.

SC4 - Affordable housing UNSOUND – The policy fails to acknowledge the issue of financial viability which is of fundamental importance when considering how much needed affordable homes will be delivered over the plan period. The rise in threshold from 1 to 3 is welcomed, however, the policy remains too inflexible regarding potential viability issues in the delivery of development.

The NPPF explicitly states in paragraph 50 that: “Such policies should be sufficiently flexible to take account of changing market conditions over time”.

Furthermore, paragraph 173 of the Framework requires local planning authorities to ensure that plans are deliverable. “To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing landowner and willing developer to enable the development to be deliverable.”

Para 177 of the NPPF indicates that affordable housing or local standards requirements should be kept under review to this effect. Development which is not viable will simply not be delivered. In such a case the plan will fall behind with meeting its targets.

The plan doesn't seem to recognise other forms of affordable housing than social rented housing: These should also include: 1. Affordable rented at (80% of market rate), 2. Intermediate housing including: Shared ownership, First-Buy, Low cost housing for sale, intermediate rented housing and 3. self build.

The inclusion of cross subsidy to facilitate affordable housing is supported.

The Policy needs to be rethought to take more account of the need for flexibility in relation to market conditions.

SC5 - Self containment of settlements UNSOUND – The revised policy still fails to acknowledge the functional relationships that exist between settlements, as specified in paragraph 55 of the Framework.

The policy treats settlements like islands isolated from those around them, the list of facilities which need to be available to be considered suitable for development is a simplistic approach, flawed because it fails to acknowledge the complex inter-relationships which exist between settlements. Para 55 of the NPPF recognises that groups of villages may effectively pool access to a range of facilities.

The policy should be reworded as follows: “*Development which improves the balance of land uses within a settlement, or cluster of settlements, in terms of minimising overall transport use will be encouraged.*”

WA1 – Watchet development SOUND – The policy correctly identifies the key issues that need to be addressed by future development at Watchet.

WA2 - Strategic development at Watchet SOUND – The proposed allocation is considered to represent the most sustainable location for future development at Watchet. (Benefits of development described).

WI1 – Williton development SOUND – The policy correctly identifies the key issues that need to be addressed by future development at Williton.

WI2 - Strategic development at Williton Generally sound – The proposed allocations are considered to represent the most sustainable locations for future development at Williton. It is however recommended that the West of Williton allocation is shifted east to adjoin the built up area of the village. Consultants have carried out work positively responding to the flood risk and highway issues relating to the land west of the village in order to move the proposed allocation to a location adjacent to the existing built up area whilst achieving substantial benefits.

Land to the north of Williton - The Wyndham Estate is supportive of the Council's proposals to allocate the two sites on the north side of Williton namely; 'Land north of school and west of Liddymoor Lane' and 'Land north of Roughmoor Industrial Estate'.

SV1 – Development at primary and secondary villages SOUND – The policy will help to ensure that future development in the District's smaller settlements is of an appropriate type and form. The policy also recognises the functional relationships that exist between groups of settlements

OC1 – Open countryside development UNSOUND – This policy is inconsistent with national

	<p>policy as set out in paragraph 55 of the Framework.</p> <p>There is no requirement within the Framework that states that residential conversion schemes must include employment or tourism uses and so to include such a requirement within policy OC1 is contrary to national policy. The policy should therefore be amended to bring it in line with national policy, particularly with regards to conversion schemes.</p> <p>EC1 - Widening and strengthening the local economy UNSOUND – The policy fails to accord with paragraph 22 of the Framework which recommends new sites for employment provision be treated on their merits if allocated sites are failing to come forward. The Wyndham Estate generally agree that economic developments should, in appropriate circumstances, be directed towards existing employment sites. However the Council needs to recognise that this may not always be the most appropriate option and that in certain circumstances new sites may need to be brought forward if the West Somerset economy is to become stronger and more diverse. This is recognised by national government within the Framework in para.22.</p> <p>EC6 - Work/live developments UNSOUND – The policy should be amended to remove the requirement for the employment element to form the majority floor space area of a work/live unit, many live/work businesses revolve around a modest floorspace need for an office or studio. It should be possible to control the principle by condition on the planning permission. The policy as proposed reduces the likelihood of its meeting its objective.</p> <p>EC9 - Tourism outside of settlements - UNSOUND – Criterion 3 will serve to stifle new tourism related developments in the countryside. The text: “<i>without generating new unsustainable transport patterns</i>” needs to be removed if the policy is to prove valuable. The NPPF acknowledges that a different approach to sustainable development is sometimes necessary in rural areas if the Framework’s objectives are to be achieved.</p> <p>EC11 - Agriculture (diversification) - SOUND – Subject to clarification of ‘Sustainable Tourism’ to the effect that this does <u>not</u> mean resisting development which would mainly be accessed by the private car. The NPPF acknowledges that a different approach to sustainable development is sometimes necessary in rural areas if the Framework’s objectives are to be achieved.</p> <p>TR2 - Reducing reliance on the private car - UNSOUND – The policy fails to recognise the innately rural nature of West Somerset, which means that private cars will inevitably represent the primary mode of travel, particularly in the more remote parts of the district. The NPPF acknowledges that a different approach to sustainable development is sometimes necessary in rural areas if the Framework’s objectives are to be achieved.</p> <p>NH1 – Historic environment – SOUND. The policy is in generally in accordance with national guidance set out in the Framework. The Wyndham Estate remains generally supportive of policy NH1 which seeks to safeguard the district’s important heritage assets and is pleased that ‘undesigned heritage assets of high importance’ has been added to the list of assets of particular note. These undesigned heritage assets often comprise traditional rural buildings which form an important part of the distinctive character and cultural identity of the area and they have a significant economic role in terms of attracting tourists to area.</p>
Mr & Mrs Barry Summers	Now Brushford has been added to the 2032 Revised Preferred Strategy Local Plan we are keen to pursue the development of our site along Ellersdown Lane Brushford.
G Townsend	All the land in my ownership, and submitted by me into the SHLAA process at Lower Hopcott, and Graves Marsh Minehead and also Dragon’s Cross, Old Cleeve remains available for consideration for development.
Dr J. Jones	<ol style="list-style-type: none"> Does not consider that the proposed changes properly address the requirements of the NPPF. If any parts of the allocated sites are found to be unsuitable for development there will not be enough land identified to meet the objectively assessed housing need for the area. To remedy this, other sites previously identified in report WSC 132/11 (Strategic Directions of Growth) should also be included, such as the southern part of A2 from Appendix. A of WSC 132/11. This site is within the Minehead built up area, is well accessed from the A39 and has good public transport services. Developing the southern part of A2 would have less impact than developing MD2 or LT1. Without this site the plan will not comply with the NPPF. Where and how the development limits for Minehead need to be adjusted must be identified. The plan only identifies key strategic sites, also the way in which village development will be treated is covered, the way in which non-strategic sites are to be dealt with at the three major settlements needs to be clarified in the policy.

	Utility companies and other commercial interests
Wessex Water	<p>Sewage treatment - capacity is sufficient to provide for the sites at Minehead or Watchet.</p> <p>MD1 Minehead -</p> <p><u>Water supply</u> - Existing trunk mains, a service reservoir and a pumping station are located within the boundaries of the site. Any development proposals coming forward should take account of these mains and the reservoir.</p> <p>We do have a number of concerns where development is allocated around critical assets and we regret the need to make adverse comments to ensure that we can protect these assets. Subject to detailed layout we will need to maintain statutory easements and our requirements may require extensive diversions. The land slopes northwards toward Hopcott Road, properties constructed upon higher elevations will not receive satisfactory pressure from the supply system and further measures to boost supplies on higher ground will be required. We would seek to avoid development in these areas.</p> <p>We have been unable to complete a detailed engineering appraisal however we may also need to safeguard land to allow for future extensions for water storage.</p> <p><u>Foul Water & Surface Water Drainage</u> - Development proposals are located at the boundaries of the existing public sewer network and there is insufficient capacity for a development of this scale in the local network. The downstream sewer catchment drains to a large pumping station, there will be a limited amount of spare capacity to accept the initial phase of development and beyond this threshold, down-stream improvements will be required to prevent sewer flooding. Network modelling will be required to determine the scope and extent of capacity improvements or a satisfactory point of connection.</p> <p>Surface water drainage will be required to satisfy flood risk measures under the NPPF and discharges will be restricted to greenfield run off rates. Disposal to land drainage systems will be required, no surface water connections will be permitted to the foul sewer.</p> <p>Watchet</p> <p><u>Water supply</u> - Water supply mains cross this development land. Development proposals will need to accommodate statutory easement widths associated with these mains. It is likely that off-site reinforcement will be required to provide a satisfactory water supply for development proposals. This can be requisitioned from Wessex Water</p> <p><u>Foul Water & Surface Water Drainage</u> - Public foul sewers cross the development land, however network modelling will be required to confirm a suitable point of connection to the public sewer and the downstream improvements.</p> <p>Surface water drainage will be required to satisfy flood risk measures under the NPPF and discharges will be restricted to greenfield run off rates. Disposal to land drainage systems will be required, no surface water connections will be permitted to the foul sewer.</p> <p>Williton</p> <p><u>Water supply</u> - A long off site connecting main may be required to provide a satisfactory water supply. This can be requisitioned from Wessex Water.</p> <p><u>Foul Water & Surface Water Drainage</u> - The foul system drains southwards through the town and beyond to Doniford pumping station and is then pumped onwards to Watchet STW. Local sewers will not provide sufficient capacity and a long off site sewer will be required to drain development proposals. This can be requisitioned from Wessex Water. Further appraisal work will be necessary to determine the scope and extent of downstream capacity improvements. It is likely that limited capacity is available to drain a small number of properties in the first phase of development.</p> <p>Surface water drainage will be required to satisfy flood risk measures under the NPPF and discharges will be restricted to greenfield run off rates. Disposal to land drainage systems will be required, no surface water connections will be permitted to the foul sewer.</p>
EDF Energy	<p>Supports changes to align the Local Plan with the NPPF, however:</p> <p>The Local Plan should have regard to the overall spirit of the NPPF, acknowledging the opportunities which come from growth and development, not solely focusing on the potential challenges of some developments (NPPF para. 187).</p> <p>Other significant changes to the local context (NPPF para 10) for example the consenting of</p>

	<p>significant infrastructure projects</p> <p>As previously stated, policies EN1 and EN2 should be deleted. The NPPF does not cover matters subject to National Policy Statements, these policies seek to create a local test of compliance which is at odds with the NPS and the NPPF. This is particularly relevant following the granting of the DCO for the Hinkley Point C nuclear power station project which includes provisions to control and mitigate the impacts of the project.</p> <p>Policy NH7 – comments focus on the proposed Inner and Middle Land Use Planning Consultation Zones and proposed consultation arrangements. In the inner zone, there is no requirement to consult ONR, the default position being that 'residential development is likely to be refused'. This represents a significant change in the current arrangements where graded planning controls apply to new development and within which applications for new development must be referred to ONR. The response appends "the current consultation zone plan for Hinkley Point" which is stated to relate to the Offsite Emergency Plan. The representation raises issues about the way draft policy NH7 interrelates with the Offsite Emergency Plan and current ONR consultation arrangements regarding development proposals within the various zones. A number of specific suggestions are put forward to resolve the issues raised.</p>
<p>Mono consultants (for the Mobile Operators Association)</p>	<p>There should be a specific telecommunications policy in the Local Plan (see NPPF paragraphs 42 and 43). The following wording is suggested to meet the requirements of the NPPF:</p> <p><i>"Proposals for telecommunications development will be permitted provided that the following criteria are met: -</i></p> <p><i>(i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area;</i></p> <p><i>(ii) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building;</i></p> <p><i>(iii) if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority.</i></p> <p><i>(iv) If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.</i></p> <p><i>When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology."</i></p> <p>It would be appropriate to introduce this policy with the following wording:</p> <p><i>"Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With the growth of services such as mobile internet access, demand for new telecommunications infrastructure is continuing to grow. The authority is keen to facilitate this expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and siting equipment on existing tall structures and buildings."</i></p>
<p>Bourne Leisure Ltd.</p>	<p>Bourne Leisure takes the principles of sustainable development very seriously throughout the country. Both of the Company's operations in West Somerset contribute to the three dimensions of sustainable development.</p>

- The sites contribute to the local economy by providing tourism resources catering for the visitor economy and valuable employment opportunities (directly and indirectly).
- Environmental issues are a key consideration and Bourne Leisure uses sensitive and careful designs, so as to seek to minimise the impact of new development on the environment and where possible, the Company seeks to enhance the landscape setting of its existing holiday parks, hotels and Resorts.
- Both Doniford Park and the Butlins Resort help to support a strong, vibrant and healthy community; in particular, by providing stable employment opportunities for local residents.

Policy SD1 Sustainable Development - does comply with the NPPF, however the Local Plan's tourism policies need to be more positively expressed to be NPPF compliant.

The spatial vision should have references to tourism strengthened in line with Government Tourism Policy 2011, para 2.1. In particular the Vision for the economy should have added emphasis on tourism so that the plan's vision, strategic objectives and policies are in harmony.

Policy MD1 Minehead/Alcombe Development - is broadly supported but it should be more supportive of tourism development. The Butlins Resort should be explicitly cited as the town's key tourism asset, and development proposals seeking the retention, consolidation, enhancement, diversification and intensification/expansion of its facilities should be supported in principle. In particular, planning policy endorsement should be given to proposals which improve the range and quality of accommodation and facilities, particularly when they result in permanent and significant improvements to the layout and appearance of the Resort and its setting. The proposed amendment to draft Policy MD1 would then clearly incorporate and satisfy the three pillars of sustainable development as set out in NPPF, namely that economic, social and environmental benefits should result.

NPPF paras. 93 and 94 cover the LPA's responsibility towards mitigating climate change impacts and managing flood risk. In response to these paragraphs, the Company suggests that the emerging policy be re-drafted so as to take full account of the specific characteristics and vulnerability of any existing and proposed coastal development and land use. For example, the Butlins Resort - and other long-established coastal facilities for holidaymakers such as Doniford Holiday Park that lie elsewhere within the Local Plan area - clearly need to remain sited adjacent to the sea. The continued protection of the Butlins resort and coastal Holiday Parks against coastal flooding is of critical importance, particularly in economic terms; draft Policy MD1 should therefore specifically allow operators to undertake/ contribute towards the funding necessary for coastal defence construction, and/ or the maintenance and improvement works that may be associated with maintaining coastal businesses and related development proposals, in order to protect their property and operations.

Employment policy EC1 - Bourne Leisure considers that in order to properly reflect the NPPF, tourism should be specifically identified as a key employment-generating activity and explicitly promoted through draft Policy EC1.

Employment policy EC8 Tourism within settlements - Bourne Leisure welcomes draft Policy EC8 in so far as it seeks to enhance the tourism offer within existing settlements. Bourne Leisure is pleased that reference is made to tourism in settlements, as the NPPF makes it clear that LPAs should "support existing business sectors". However, the draft Policy should also recognise and positively promote the full range of other locations and forms of tourism-related development, and their associated economic benefits, that would address the Vision and Strategy of the emerging Plan. The Company considers that draft policy EC8 should therefore be expanded, to refer to promoting other forms of tourism development such as visitor accommodation, and other locations, which can together all encourage more tourists to visit and stay (for longer) in the area.

Policy EC9: Tourism outside of settlements - The policy sets out specific criteria against which tourism development outside of settlements will be tested. Bourne Leisure broadly endorses this policy and its approach but suggests that additional clarification is provided on the application of the proposed criteria.

The first criterion against which tourist development will be assessed outside of settlements seeks to test the need for the development, by questioning whether the proposed location is essential to the business and whether it could be located elsewhere. As currently drafted, policy EC9 does not specify the kind of evidence required to satisfy this test. As set out above, many holiday facilities need to be located/ remain adjacent or close to the sea and any subsequent development proposals for expansion that are to finance improvements to the quality of the offer cannot be developed in isolation away from the existing operation.

It should be explained that the Council recognises the vital importance for a coastal business such

	<p>as that operated by Bourne Leisure of remaining in a coastal location.</p> <p>For the policy to be in line with the NPPF, it should be redrafted to recognise that some businesses need to be located in close proximity to the coast due to the nature of their operation. The NPPF states that: "Investment in business should not be over-burdened by the combined requirements of planning policy expectations." The fact that a development lies outside a settlement should not be the only determining factor when tourism proposals are concerned, particularly within the context of the valuable contribution it can make to the economic prosperity of the area.</p> <p>Policy EC10: Gateway settlements – The Company endorses the draft policy in principle, but considers that the policy should be revised, to specify that the provision of a range of tourist accommodation and facilities is encouraged. The draft policy should also be amended to fully recognise and refer specifically to the role of Minehead as a tourist destination in its own right, as well as acting as a gateway to the wider Local Plan area.</p> <p>Policy TR2: Transport - The emerging Plan needs to recognise that many tourism uses, such as touring sites for caravans, are car dependent. These and other tourism uses are most often in locations where it may be difficult to provide access by more conventionally sustainable transport modes. Bourne Leisure considers that draft Policy TR2 should therefore recognise that in relation to tourism uses in the emerging Local Plan area, there is often no alternative available other than private car for reaching those tourist-related developments that are in more remote areas.</p> <p>In addition, and specifically with reference to tourism-related development, draft Policy TR2 should, where appropriate, encourage consideration of scope for the provision /improvement of existing footpaths and cycle routes, to help reduce dependence on the private car once visitors have arrived in an area.</p> <p>Policy CC4: Coastal Zone Protection - The Policy provides a broadly balanced approach to considering development proposals in the Coastal Zone. Whilst recognising the need to protect the natural environment, Policy CC4 must be consistent with the policies of the NPPF by allowing for appropriate tourism development which benefits the local economy. This approach should be applicable even in more sensitive areas, provided that commensurate mitigation measures (such as the inclusion of a buffer zone and appropriate landscaping) can be implemented to mitigate both direct and indirect impacts. Each proposed tourism development in the Coastal Zone (and elsewhere) should therefore be considered on its own merits and with specific reference to economic, as well as environmental considerations.</p> <p>With regard to coastal zone protection and as referred to above in the context of flood risk, amended policy CC4 should allow for coastal landowners and business operators to relocate buildings to land within or immediately adjoining their landholdings, for example, using open space within existing sites, where this is necessary due to coastal erosion. The policy should also allow landowners to continue to: help fund and maintain existing coastal defences; respond in emergency situations to protect their land; and allow for temporary use of sites within the coastal zone for tourism uses. Bourne Leisure considers that existing tourism developments such as their operations should continue to be protected, and that as a minimum, and in regard to coastal tourism businesses, policies should seek to hold and maintain the existing defence line. This would be in order to allow for tourism operators in coastal locations to retain, fund and implement appropriate coastal defence work to protect their property and to enable them to continue to operate and improve their businesses.</p>
	<p>Members of the public.</p>
<p>Christopher Durham</p>	<p>The following issues require further work:</p> <p>The strategy should focus development on Hinkley Point C and the M5 corridor where the main employment opportunities lie rather than around Minehead.</p> <p>The plan lacks key development sites affording residents of new dwellings quick and ready access to proven employment opportunities.</p> <p>how steering major development away from the flood risk area is reconciled with the local authority's present disposal of two sites in Seaward Way, Minehead within the risk area, and their marketing as "for development"?</p> <p>how has the Authority evaluated and balanced the posited residential need with the potential environmental damage from development of areas MD2 and LT1 to the landscape in which</p>

	<p>Minehead is set; and adverse effect on nearby homeowners.</p> <ul style="list-style-type: none"> ○ What seems to be envisaged is development akin to building types and densities as at, say, Silk Meadows, Taunton. ○ Such consequential landscape damage would be especially visible from tourist-sensitive points in the National Park such as North Hill & places such as the supermarket car parks off Seaward Way and the rail entry to Minehead. ○ Brown land re-development sites (such as the old Minehead hospital) can help minimise encroachment on the rural/agricultural hinterland of Minehead and other settlements. The draft plan should include a default housing presumption for brown land re-use. ○ Local housing authorities have powers to meet housing need by building outside their areas [as the LCC built houses in Minehead]. The draft plan needs to evaluate that option seriously, especially in the M5 corridor. <p>how the restricted transport improvements for West Somerset envisaged in the plan are compatible in terms of access and logistics with siting industrial & commercial development to generate extra jobs for people living in new housing developments around Minehead.</p> <ul style="list-style-type: none"> ○ It doesn't help that none of the available money from Hinkley Point C will go towards improving transit times on the transport links, the A39 & A358 especially, between West Somerset and the national road & rail networks. ○ Though the Government cancelled the RSS, current proposals for infrastructure investment in Somerset will strengthen the trend for such areas as the M5 corridor to attract businesses and employment at the expense of outlying areas such as most of West Somerset. <p>The plan reflects a painstaking attempt to reconcile demands in various documents and surveys with interests across the local terrain but seems too source document driven. The major issues such as housing & employment need, terrain, transport links and flood risk do not yet seem to have been brought into a right balance with each other.</p>
Graham Lamacraft	<p>Question 1. In my opinion the proposed changes address the changes in the National Planning Policy Framework.</p> <p>Question 2. My responses to some of the new policies/changes to existing policies are as follows:-</p> <p>SC1 Section 3 - This policy is already a nonsense due to the fact that Dunster Marsh, classified as a Secondary Village, has no facilities whatsoever and yet has a development site for 56 houses (hardly small scale) even though there is no "Clearly defined local need" at Dunster Marsh.</p> <p>The planning authority, having granted planning permission, should make every effort to ensure it is developed within the current consent period and if not reject a renewal of the consent, should it lapse, in accordance with the policies set out in the Draft Plan. This consent has also set a dangerous precedent.</p> <p>WA1 and WA2 The development of Liddymore Farm to the south east of Watchet should be re-instated and the proposed site identified as LT1 removed. The development of Liddymore Farm is clearly a single site just as Parsonage Farm is. It should therefore be treated as such and not as a split site which is how it is now being perceived. Liddymore Farm has direct access to local shops in Liddymore Road, has direct access to Watchet First School and can provide better access into the road networks to Taunton and Bridgwater. The development of Liddymore Farm naturally extends the limits of Watchet in an almost mirror version of Parsonage Farm and already contains private residences and a number of agricultural buildings thus creating in part a brown field site.</p> <p>LT1, Watchet - The inclusion of Site LT1 is on the "wrong side" of Watchet, is in an extremely prominent position and will be very expensive to develop making it difficult to deliver sufficient affordable housing.</p> <p>WI1 and WI2 - The key site to the east of Williton should be re-instated and the site to the west removed. The site to the east is the most natural to develop of all the Williton sites.</p> <p>It is the only site that can deliver an extensive mixed site including land for a wide range of community activities which is desperately needed in Williton. Whilst there are certain flooding issues over part of the site future development can be designed and arranged to minimise any</p>

	<p>impact from flooding.</p> <p>The visual impact of this site would be minimal and there is a direct pedestrian access to the centre of Williton with all its shops and other services.</p> <p>It is probable that the majority of traffic flow from new development in Williton will be to the north, Bridgwater, or to the south, Taunton. The development of this site provides the only opportunity of creating a link road between the A39 and the A358 on the eastern side of Williton thus greatly reducing the flow of traffic through the centre of the difficult and often congested centre of the village. Such a link road would also greatly benefit the industrial site at Roughmoor and the West Somerset Railway Station.</p> <p>The development of the site to the west of Williton would create a new site detached and severed from the town and would form an undesirable extension into open countryside which the local plan is trying to avoid. It would probably add to the traffic flow into the centre of Williton for the reasons stated above and could only have one access onto the A39.</p> <p>The above changes would satisfy the proposed requirements set out in Section 4.2 of the Draft Plan, to identify “ the most appropriate locations for new development “ in West Somerset for the plan period.</p>
Terence Price	<p>Q1 - Yes, I do, as far as I understand them. I think to a layman it is very difficult to understand all the bureaucratic language!</p> <p>Q2 - As far as the residential development at High Marsh Farm Dunster Marsh is concerned, under Policy DM/1 Mixed-Use Development (i)(c), in the West Somerset District local plan April 2006 affects our property which backs onto this land south of Marsh Lane, we would be satisfied with this proposal if it came into effect.</p> <p>One further point, which may or may not be relevant, is that this piece of land was used by an emergency helicopter attending a road accident on the A39 between Dunster Steep and the top of Marsh Street in early May this year as it was the only suitable landing site adjacent to the accident. It follows that if this land was preserved as a recreation field and picnic area this facility would still be available to the emergency services.</p>
Gail Everett	<p>The site in Minehead is not serviced by any public transport. The plan particularly mentions the proposals are to attempt to get people 'out of their cars' - how can this be done if there is no public transport. There are also few job opportunities in Minehead and this means travelling to Taunton or Bridgwater - this means using private cars. Have all these things really been thought through properly. Our local bus route to Taunton is being cut at present, this will not help another 700 odd people moving to Minehead, let alone the current residents!</p>
Geoffrey Williams	<p>I personally disagree with one additional point on the changes to the plan. One of the new acceptable cases for granting planning permission in open countryside is for the purpose of hunting. In a civilised society it is unacceptable to hunt wild animals for 'sport'. Allowing property development specifically to support such an activity is wrong. Both national public opinion and legislation are both against this activity yet West Somerset policy is now ignoring this and can now be seen as giving active encouragement to the killing of wildlife and the associated cruelty. I therefore propose that hunting be deleted from the acceptable reasons to grant planning permission.</p>
Cllr Andrew Hadley - West Somerset Council Housing, Health & Wellbeing Shadow Portfolio Holder.	<p>Does not consider that the plan will deliver the identified need for affordable housing across West Somerset. The key strategic sites allocated are too few to bring forward sufficient affordable housing and the policy for the main settlements is too restrictive to provide the balance of the identified affordable housing requirement.</p> <p>The new policies refer to the removal of development boundaries, whereas the plan also refers to the continuing policies from the 2006 Local Plan still having weight as a material consideration, these two policies are in conflict with each other.</p> <p>Policy SD1 would effectively be neutralised for development outside of the existing development boundaries due to old policies SP/2 and SP/5.</p> <p>Policy SC1 – the provision for development on the edges of Primary and Secondary villages should also apply to Minehead, Watchet and Williton. The same point as above also applies. I don't believe that the second point in the 'purpose' section has been fulfilled.</p> <p>Key Issues –</p> <ul style="list-style-type: none"> • the provision of significantly more affordable housing,

	<ul style="list-style-type: none"> • The identification of the most appropriate locations for new development • The need to provide c2,900 dwellings during the period 2012 to 2032. <p>The most up –to date evidence, the 2013 SHMA review was not made available alongside the consultation, which is a failure in the consultation process. The housing figures issue is not dealt with sufficiently prominently in the Local Plan.</p> <p>The inconsistency between the high percentage of affordable housing needed as part of the total, and the amount of market housing which would be necessary to provide it is highlighted, as is the area of land estimated to be necessary.</p> <p>The Key strategic site identified is high value land which will render the delivery of significant amounts of affordable housing unviable.</p> <p>All the available land at Minehead should have been included in the consultation. In particular the land between the A39 Porlock Road junction and Woodcombe might have offered a better site in landscape and land value terms.</p> <p>The key issues raised in 4.1 and 4.2 shown above have not been met by this plan. Key issue 4.4 is simply wrong and misleading.</p> <p>The plan will not deliver the spatial vision for housing as we under-deliver affordable housing whilst over providing market housing by 925 dwellings for which there is no identified need.</p> <p>The plan fails to achieve the strategic objective of providing identified affordable housing. The headline figure of 2,900 dwellings has been given little thought as to how the identified need will be delivered in terms of affordable housing and strategic sites.</p> <p>43 dwellings per annum cannot be delivered at Minehead Watchet and Williton without changing the development boundaries due to the material status of saved local plan policies SP2 and SP5.</p> <p>An alternative approach may be needed to the delivery of affordable housing – securing cash equivalents from developers rather than the houses themselves, land for affordable housing could be bought and leased to RPs on a long lease with a peppercorn rent. 900 open market houses generating 315 equivalent affordable houses at £35,000 each would make the Council over £11million to invest in land and affordable housing associations. These figures are guesswork but it would offer an alternative to over-provision of market housing in an attempt to deliver the appropriate amount of affordable housing.</p>
J Butterworth	<p>Raises concern that a number of policies he supported in the first Preferred Strategy have been substantially altered.</p> <p>Objects to the identification of Blue Anchor as a Secondary Village because it lacks the necessary community facilities and asks to have it removed from the policy.</p> <p>Development in such isolated settlements would be ecologically unsound in terms of transport and service delivery.</p> <p>Little demand for affordable housing in such remote communities, so policy should provide for significant contributions towards affordable housing elsewhere and to S106 monies which would benefit the whole community.</p> <p>The reduced protection for the coastal zone is objected to both in area and degree of protection which should be retained.</p> <p>Highways need to be improved before more development takes place, especially the A39. Blockages when accidents occur for instance are a serious planning consideration and should be mentioned in the Local Plan.</p>
Mr J Erfurt	<ol style="list-style-type: none"> 1. Minehead is a seaside town in an area of great landscape beauty. Further major road building in the area is impractical. The evidence on which the plan is based requires further consideration. 2. Questions the building of more housing to meet projections / aspirations. Any building should arise from the tourism industry connected with the Exmoor National Park landscape which would involve a need for rented housing to meet the needs of those on low incomes.
R Strong	<p>Objects to the extension of the settlement line eastwards into farm land and associated barn and manege south of Combeland Road (belonging to Penny Hill Farm).</p> <p>The last version of the 2006 local plan proposals maps is labelled 'draft' therefore it is suggested that no final decision was made on these boundaries.</p>

	<p>The release of this land for development would be contrary to policies EC5 and NH5 of the Local Plan which seek to retain farming businesses and agricultural land. The property is currently on the market, with an attempt being made to remove the agricultural tie, being within the development boundary would make it harder for anyone to purchase it for viable farming. The settlement line should not be extended in this area.</p>
Mr P Morris	<ol style="list-style-type: none"> 1. P17 amended policy 1 - Concern expressed that scale of development proposed for Watchet and Williton will adversely affect their character, and attractiveness to tourists. 2. P26 - If population is increased to this degree, safe pedestrian links must be provided to existing centres. 3. P32 – Recent public transport cuts have made Watchet and Williton into less well serviced parts of the District and therefore unsuitable for large scale development 4. P33 the items in para. 2 of the ‘purpose’ section will make things worse. Should the paper mill close, then the proposed allocations for Watchet should be switched to that site. A statement to this effect should be included in the plan. 5. P35 – 290 dwellings for Watchet will change character of town and exaggerate all the existing problems of transport congestion, service provision etc. Concerned also about the non-residential element. The WA2 site boundary should be moved significantly to the north to protect the view of the Five Bells and Brendon Road area residents. Consider relocating some of the development to the west of Brendon Road and east of the footpath abutting the paper mill. 6. P37 – these traffic problems will increase as a consequence of the Plan’s proposals for Watchet and Williton. 7. P41/42 – the justification is a recipe for indefinite expansion. The amended policy offers no defence for land which is affected by new development when it will meet the criteria of the first paragraph and hence be liable for development in future ,such development could therefore proceed exponentially over time. 8. P61 - The Steart proposals will cause a great deal of visitor pressure and additional traffic, but the enhanced intertidal habitat provision is nevertheless supported. 9. Population pressures are recognised a reality, however the landscape and nature conservation values of the District are the basis of its tourism industry and development cannot proceed without recognition of the fact that a point is being reached where a line has to be drawn to prevent the destruction of the natural environment which is why people wish to live and visit here.
Mr M Barran	<ol style="list-style-type: none"> 1. The proposed changes do address the NPPF, but 2. there should be more flexibility about where housing is allowed. 3. “Development boundaries have been drawn far too tightly”.
Mr K Marsh	<ol style="list-style-type: none"> 1. Land between Ellicombe Meadow and Ellicombe Lane – this site has been added to the Plan after consultation between West Somerset Council and the developer (Consensus and Strongvox Ltd.) 2. The land is green belt, with an agricultural tie and is not needed to achieve house building requirements for West Somerset. 3. Development would be detrimental to existing residents and also the National Park which is adjacent. 4. There is no demand for the properties.
A Stiven	<p>The Plan is well thought out in terms of housing provision with the right proportion of houses proposed in relation to the sizes of the settlements concerned. A policy of controlled growth over 20 years is the right one.</p> <p>Recreational areas for children, meeting halls for local societies and in larger developments new public houses and green areas should be provided. The aim should be to provide facilities which make communities rather than just building houses. This should lessen the tendency for vandalism and crime to occur.</p> <p>Affordable housing needs should be provided as identified.</p> <p>Concern was however expressed at the lack of improvement proposed to road and rail infrastructure in West Somerset to cope with the additional traffic which would be generated by</p>

	<p>2900 houses, and initially at least, by the Hinkley Point C project. Developers would have to pay for road improvements.</p> <p>The West Somerset Railway could provide a limited commuter service if a subsidised diesel train was possible, although access to Taunton station might prove unviable. Also, bus services during the evening are of little use to users since the changes, making public transport an unattractive alternative to the car.</p> <p>The Council should lobby for the re-instatement of buses from Taunton to Minehead after 8pm and should consider subsidising them when finances allow perhaps in conjunction with Taunton Deane Borough Council and Somerset County Council.</p>
B Maitland-Walker	<p>A policy should be included in the LDF to give Hotels and other large buildings in Minehead (and West Somerset) some protection against conversion to other uses.</p> <p>A policy should be included in the LDF to protect all listed buildings from applications to demolish them.</p> <p>The Local Plan should require that in new development, consideration should be given to the size and layout of rooms and doorways etc. to ensure they can also accommodate the elderly and young disabled, who may at any stage in their life need wheelchair access.</p> <p>Solar Panels are installed as standard on affordable housing. This should be extended to all new buildings. Developers should be encouraged to build in rainwater storage systems whenever possible.</p> <p>When a new development is envisaged, consequent increased risk of flooding to existing development should be taken into account, and whenever provision of sustainable drainage systems is required there should also be commuted sums agreed for maintenance of the rivers and rhynes that take the runoff.</p> <p>A policy should be included to ensure that communal maintained areas have some maintenance agreement included within the planning consent. Alternatively land should be incorporated within the curtilage of the proposed properties giving them larger garden areas for children to play in, or grow their own vegetables should they wish to do so.</p>
A Bendall	Supports the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
Lewis Baker	Supports the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
P Berman	Supports the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
Michael Biggs	Supports the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
J Bone	Supports the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
Michael and Jessica Clinch	Support the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
P and R Coe	Support the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
S and J Douglas	Support the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
J and R Dowd	Support the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
Gillian Gatfield	Supports the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
Rupert Gatfield	Supports the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
R and P Gunn	Support the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
D Harrison	Supports the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
John Hays	Supports the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
E and R Henderson	Support the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
David Hopley	Supports the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
D and E Impey	Support the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
M A James	Supports the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
S James	Supports the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
A Kilbride	Supports the proposal to designate the Brendon Hills fringe as a Special Landscape Area.

Stephen Kimsey	Supports the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
Peter Krijgsman	Supports the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
R Lloyd	Supports the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
Norma Martin	Supports the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
Bruce and Sophy McIntosh	Support the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
M Mowat	Supports the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
Ian Norris	Supports the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
Richard Osborne	Supports the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
P and S Ruffle	Support the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
Alice Sumption	Supports the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
J Villiers	Supports the proposal to attach more importance to the landscape quality of the Brendon Hills fringe in making planning decisions.
Marc Vyvyan-Jones	Supports the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
V Ward	Supports the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
M and J Washington-Smith	Support the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
Peter Welsh	Supports the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
Anne Wilson	Supports the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
Peter Wilson	Supports the proposal to designate the Brendon Hills fringe as a Special Landscape Area.
Michael Winterton	Supports the proposal to designate the Brendon Hills fringe as a Special Landscape Area.

Report Number: WSC 146/13
Presented by: Andrew Goodchild, Planning Manager
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Report to a Meeting of: Local Development Panel
To be Held on: 14th November 2013
Date Entered on Executive Forward Plan N/A
Or Agreement for Urgency Granted:

UPDATE ON PRODUCTION OF DESIGN GUIDE AND MAJOR DEVELOPMENTS SPD

1. PURPOSE OF REPORT

- 1.1 The purpose of this report is to provide Members an opportunity to comment on and inform the working draft of the Design Guide and Major Developments SPD. The SPD which will 'hang off' the new Local Plan when it is adopted (the intention would be to seek to adopt the SPD at the same time that the Council adopts the Local Plan) will be used day to day by Planning Officers when considering the design aspects of new development. The Major Developments element of the SPD is specifically designed to help shape the larger allocated strategic sites within the new Local Plan.

2. CONTRIBUTION TO CORPORATE PRIORITIES

- 2.1 There are no direct links to Corporate Priorities however, the Housing, Welfare and Economy Service Plan contains a number of service specific objectives to deliver the new Local Plan of which the SPD forms a complimentary part.

3. RECOMMENDATIONS

- 3.1 That Members of the Local Development Panel note the progress in the production of the Design Guide and Major Developments SPD and specifically:
- (a) Confirm that Members are content with the subject matters covered in the working draft
 - (b) Advise on any concerns or issues within the content of the working draft
 - (c) Confirm that from a Member perspective that the working draft of the SPD is compatible with the current draft of the Local Plan

4. RISK ASSESSMENT (IF APPLICABLE)

Risk Matrix

Description	Likelihood	Impact	Overall
That poor quality development takes place because the policies of the new Local Plan are too strategic for making day to day decisions with regard to Design	3 (possible)	2 (minor)	6 (low)

<i>The SPD is developed so that while its focus is on the approach to Major Development within the District the lessons learnt from a detailed analysis of local distinctiveness can inform day to day decisions</i>	1 (rare)	2 (minor)	2 (low)
That major development takes place within the District which does not help meet or harms the strategic objectives set out in the new Local Plan because of a lack of detailed guidance on the Councils approach to this type of development, compounded by the loss of guidance and policy at a National level	3 (possible)	3 (moderate)	9 (medium)
<i>That the SPD sets out clearly the approach that the Council will take in handling Major Development proposals both from a Design but also process perspective</i>	1 (rare)	3 (moderate)	3 (low)
That the content of the SPD proves an inhibitor to development activity within the District as it provides tests which are too stringent	2 (unlikely)	3 (moderate)	6 (low)
<i>That consultation with landowners, developers and agents is built into the consultation process and detailed analysis of any comments set out on this issue are carefully considered</i>	1 (rare)	3 (moderate)	3 (low)
That the SPD is developed in advance of the emerging Local Plan and harms the integrity of the Local Plan process	2 (unlikely)	4 (major)	8 (medium)
<i>Regular discussions and adjustments to the programme for delivering the SPD to take account of the timetable associated with the production of the emerging Local Plan with overall control set by the Local Development Panel</i>	1 (rare)	4 (major)	4 (low)

The scoring of the risks identified in the above table has been based on the scoring matrix. Each risk has been assessed and scored both before the mitigation measures have been actioned and after they have.

5. BACKGROUND INFORMATION

- 5.1 On 18th October 2012 the Local Development Panel considered a report on the proposal to start work on a Design Guide and Major Developments SPD. One of the recommendations within that approved report was that progress on the production and various stages of consultation/engagement will be reported to the Panel in due course and to Cabinet/Council as work progresses. This report is the first such progress report and, subject to Members comments, the intention would be to bring consultation activities in early 2014 to help shape the detail of the SPD.
- 5.2 The working draft of the SPD at Appendix A is not complete however, the first 3 sections are in a final draft form as is the section on securing consent and delivery. Sections D and E relating to general design principles and developing sustainable communities are nearing completion however, given that the consultation on the new Local Plan has only just finished and results are currently being analysed Section F on concept development has not been started.
- 5.3 As set out in the recommendations, this report is intended to offer Members the opportunity to offer comments and to input suggestions at an early stage.

6. FINANCIAL/RESOURCE IMPLICATIONS

- 6.1 The main resource implication at this stage will be officer time to work on the production of the SPD both in terms of content for Members consideration and approval and the

consultation processes and discussions that will be needed to ensure that a proposal to adopted the SPD will be sound and has followed due process.

- 6.2 The costs of production of the SPD for consultation, the running costs of consultation events and the production of some elements of the associated sustainability appraisal will be, where at all possible, absorbed in house however, it maybe that some limited expenditure could be incurred. If and when any expenditure is more clearly defined reports as appropriate will be presented for approval.

7. SECTION 151 OFFICER COMMENTS

- 7.1 None in respect of this report.

8. EQUALITY & DIVERSITY IMPLICATIONS

Members need to demonstrate that they have consciously thought about the three aims of the Public Sector Equality Duty as part of the decision making process.

The three aims the authority **must** have due regard for:

- Eliminate discrimination, harassment, victimisation
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it

- 8.1 The SPD will need to take account of Equality and Diversity implications throughout its production and during any consultation on its content

9. CRIME AND DISORDER IMPLICATIONS

- 9.1 The SPD will need to take account of best practice regarding designing out crime and the Police Architectural Liaison Officer will be consulted on the content of the emerging document

10. CONSULTATION IMPLICATIONS

- 10.1 Consultation with the community, stakeholders and consultees will be an important aspect of bringing forward the SPD and the production of the SPD must follow the Councils adopted Statement of Community Involvement.

- 10.2 It will be important to work closely with Parish and Town Councils including Minehead Town Council, Watchet Town Council and Williton Parish Council to ensure that they are comfortable with the content of the SPD. In addition existing partnerships will need to be engaged so that their aims and objectives are understood and incorporated where possible – including the Minehead Visioning Group, Watchet 2025 and the Williton Regeneration Group.

11. ASSET MANAGEMENT IMPLICATIONS

- 11.1 The only asset management implications will be if the Council elects to allocate any of the land which it owns or has an interest in through the new Local Plan process – this SPD will not have any direct asset management implications.

12. ENVIRONMENTAL IMPACT IMPLICATIONS

- 12.1 The approach to Environmental Impact Assessment is well known and the content of the SPD will need to be mindful of and / or point to that process at applicable points. The

Sustainability Appraisal associated with the SPD will need to draw out specific implications as a result of the content of the SPD.

13. LEGAL IMPLICATIONS

- 13.1 The production of the SPD will need to follow Government Advice (where that is still relevant) and will need to adhere to the content of the Councils Statement of Community Involvement as well as ensuring that the content of the SPD does not overtake due process with regards to site allocation which will be an outcome of the new Local Plan rather than this SPD



WORKING DRAFT 18.11.13

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Foreword...

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A.1 OBJECTIVES FOR DESIGN IN WEST SOMERSET

A.1.1 In accordance with the Local Plan 2012-2032 the Council is committed to ensuring that all new development is of high quality, is sustainable, is locally distinctive and responds positively to the character of its locality in which it is proposed.

A.1.2 This Supplementary Planning Document (SPD) has been produced to set out the way in which the Council will consider planning applications in relation to Design and what matters it considers applicants to should take into account. Additionally the SPD sets out the way in which the Council will expect potential developers to approach Major Developments within the District.

A.1.3 The SPD has been produced to set out the Council's position regarding the princi-

ples of good place-making and sustainable development within the context of creating an accessible, attractive, healthy and safe environment. It seeks to ensure that each development proposal is locally distinctive, responds positively to the constraints and opportunities offered by an individual site and taking into account the surrounding characteristics. It seeks to establish what the Council expects to see when an application for a development proposal is submitted to the Council and what any such development proposal will be judged against.

A.1.4 The SPD sets out a suite of advice and objectives which are intended to provide a catalyst for achieving good quality design solutions which respond positively to this advice and to the context of the individual site. The guidance is not intended to constrain innovative

design solutions or to induce narrow and unimaginative results. It is important to state from the outset that standard 'anywhere' development proposals are unlikely to be supported by the Council and this SPD will be used to resist such inappropriate development.

A.1.5 The Government has recently reiterated the importance of good design being at the heart of good planning.

"The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people."

The National Planning Policy Framework, 2012 Para 56.

In fact The Planning Act 2008

(section 183) states that "Local Planning Authorities have a duty to have regard to the desirability of good design".

A.1.6 This SPD should provide useful advice and be a practical tool for developers, their agents, Town and Parish Councils, elected Council Members, Planning Officers and the community at large as well as other parties who play a part in the regulation of the built environment. It makes clear the Council's commitment to achieving good design within the District.

A.1.7 In addition to providing guidance about design the SPD is intended to set out what the Council would expect from those intending to develop larger sites within the District from inception to concept development, through the submission of an application and, if consent is forthcoming, during delivery on site.

A.1.8 The SPD is intended to provide a comprehensive matrix of considerations which follow, as far as possible, the stages of the design process. It is expected that designers and planners will use the document to develop design concepts and formulate applications. It will be used by planning officers during pre-application discussions, be useful for developers by setting out what officers and Members will be looking for when they consider development proposals and will hopefully provide a useful starting point for those communities considering whether or not to develop their own Neighbourhood Plan.

A.1.9 The plans, worked examples and illustrations within the SPD are intended to set out how the principles of concept development, layout and massing can be brought forward. They show generic built

form (specific to West Somerset) whenever possible rather than seeking to imply a standard style / preference which is expected.

A.1.10 The SPD is arranged into 4 parts (7 sections) :

Part 1—Policy Context / Relationship and Vision and Objectives

This part (2 sections) explain how the SPD fits into the policy framework at a local and national level and then goes onto set out what the Council expects through a vision and a range of objectives

Part 2—the Design Approach and General Design Principles

This part (2 sections) sets out the defining characteristics of West Somerset followed by the approach that that Council would expect developers to

take in appraising a site so that designers, planning officers, Members and other parties can easily understand why a particular solution has come about. The 2nd section goes on to set out some general design principles which are applicable for any given development and help to establish what features and approaches would ensure local distinctiveness.

Part 3—Developing Sustainable Communities and Concept Development

This part (2 sections) is primarily aimed at promoters of large scale development, firstly outlining what the Council would expect to see on a range of important subjects that would make up a successful development and secondly an analysis of the constraints and opportunities offered by sites which have been ‘allocated’ within the Local Plan 2012-2032.

Part 4—Design Development and Delivery

The final part (1 section) is again focused on larger scale development and elaborates on the Councils expectations for the other component parts of bringing forward a successful development proposal. It draws together and, where appropriate, builds upon other Council guidance and advice regarding consultation, the local validation checklist and the Councils Supplementary Planning Document on Planning Obligations.

A.1.11 Finally the SPD provides a Glossary so that terms used within the document can be understood and a section setting out which evidence based documents and reference materials have been used.



A.2 STATUS AND CONSULTATION PROCESS

A.2.1 The SPD will, following consultation, be adopted as Supplementary Planning Guidance by the Council. It will be a material consideration in the determination of planning applications. It will be developed and provide detail on the adopted planning policies of the Council and will be in conformity with both Government policy and guidance.

A.2.2 This SPD will be prepared subject to statutory preparation procedures under Regulations 16 to 19 of the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended). The regulations require consultation on a draft of the SPD, with Regulation 18 stipulating that a Local Planning Authority shall not adopt an SPD until they have considered any representations

made on the draft. The regulations also require the Councils to prepare a statement setting out a summary of the main issues raised in these representations, and how these main issues have been addressed in the SPD which they intend to adopt. A Report on Consultation (September 2011) has been prepared and will be published alongside this SPD, which sets out how comments made have informed the final version of the SPD.



A.2.3 Consultation on the Draft SPD will run for 6 weeks between xxxx and xxxx and will be undertaken in accordance with the Councils Statement of Community Involvement (West

Somerset SCI, June 2009). In summary, consultation on the SPD involved:

Copies of the Draft SPD and Draft Sustainability Appraisal will be made available at Council offices, libraries and on-line.

Letters will be sent to statutory consultees and members of the public who are registered with the Councils to receive Local Development Framework (LDF) / Local Plan (LP) consultation updates.

Consultation events will be held within the district, in Minehead, Watchet and Williton.

A.2.4 A full description of consultation activities will be set out in a SPD Report on Consultation.



B.1 THE NATIONAL PLANNING POLICY FRAMEWORK

B.1.1 The NPPF makes it very clear that good Design is expected from all development – one of the 12 Core land-use planning principles is that planning should:

Always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings

This Paragraph 56 of the NPPF goes on to say that *‘The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people’.*

B.1.2 It is very clear that good design remains high on the



Government agenda and that it is important that this positive stance set out within the NPPF flows through Local Policy and is reflected in decisions on planning applications.

Paragraph 58 of the NPPF states:

Local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development

SPD—Design Guide and Major Developments

that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics. Planning policies and decisions should aim to ensure that developments:

-will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

-establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;

-optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and sup-

port local facilities and transport networks;

-respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;

-create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and

-are visually attractive as a result of good architecture and appropriate landscaping.



WORKING DRAFT 18.11.13

SPD—Design Guide and Major Developments

B.1.3 This SPD is intended to be the link which ensures that ethos and approach to Design flows between the NPPF, the Local Plan 2012-2032 and Planning Decision taken by West Somerset Council.

in planning decisions but are not part of the development plan.

B.1.5 Paragraph 60 of the NPPF sets out very clearly the limits of the role which Government

what could be considered an appropriate solution, it is not intended to limit or stifle innovation, originality or initiative. It should therefore, be regarded as setting the benchmark which proposals will be tested against. Fundamental to any assessment of any proposal will be the need for development solutions to promote or reinforce local distinctiveness.

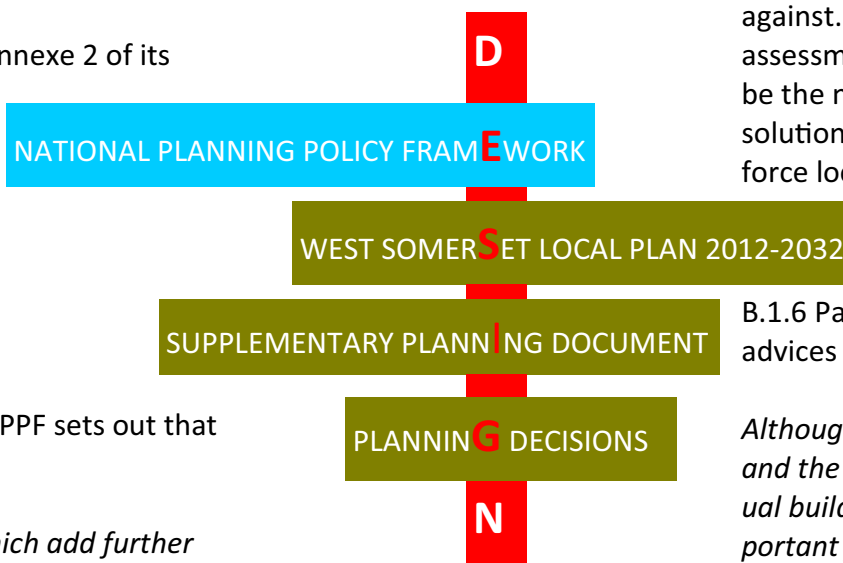
ment into the natural, built and historic environment.

B.1.7 The SPD will, as a result, seek to set out the Council's expectations and demonstrate how it would address connections between people and places to ensure that any new development fulfils the requirement to integrate with the natural, built and historic environment.

B.1.8 Fundamentally, this SPD will be used to build upon the policy context that is set out in the NPPF and the Local Plan 2012-2032 to ensure that the Council is justified in its approach which will be that:

Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions. (Paragraph 64, NPPF).

B.1.4 Within Annexe 2 of its



Glossary the NPPF sets out that SPD's are:

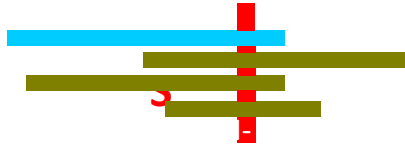
Documents which add further detail to the policies in the Local Plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration

expect local planning authorities to play in terms of imposing a particular style or taste when it comes to taking planning decision. It will therefore be necessary for the SPD to explain that whilst it may set out

B.1.6 Paragraph 61 of the NPPF advises that:

Although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new develop-

B.1.9 In terms of Major Development the NPPF sets out a range of matters where local planning authorities are expected to ‘plan positively’. In respect of Major Developments, this SPD will again be the link between the NPPF, the Local Plan 2012-2032 and planning decisions taken by West Somerset Council.



B.1.10 Clearly, larger schemes tend to bring into play a wider suite of issues for both the developer and the local planning authority to consider. It is not only the approach to domestic or commercial properties which need to be considered but also public spaces including landscaping, community based buildings and facilities, as well as connections to the surrounding area which all need to positively interact with each

other.

Part 3 of this document *Developing Sustainable Communities and Concept Development* seeks to respond to the challenges set out in the NPPF regarding Major Development namely:

It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes. (Paragraph 57, NPPF)

Local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining char-

acteristics. Planning policies and decisions should aim to ensure that developments:

- will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;*
- optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;*
- respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;*
- create safe and accessible en-*

vironments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and -are visually attractive as a result of good architecture and appropriate landscaping. (Paragraph 58, NPPF)

B.1.11 It is intended that this SPD will also assist in setting out the Councils approach to meeting the requirements a number of the core land-use principles set out in the NPPF particularly those relating to mixed use development and actively managing growth at a more detailed level than is appropriate within the new Local Plan itself. A number of high level themes run through the NPPF where the Council would be expected to provide guidance on how it expects particular forms and types of development (and particularly major development) should take place including:

WORKING DRAFT 18.11.13

SPD—Design Guide and Major Developments ■■■■

- Building a strong, competitive economy
- Ensuring the vitality of town centres
- Promoting sustainable transport
- Delivering a wide choice of high quality homes
- Requiring good design
- Promoting healthy communities
- Meeting the challenge of climate change, flooding and coastal change
- Conserving and enhancing the natural environment
- Conserving and enhancing the historic environment

B.1.12 Overall, it is clear that the NPPF expects local planning authorities to set out how they are taking on board the requirements of Government policy and that they expect local planning authorities to set out within their Local Plan's policies which further develop and help to deliver this agenda.

B.1.13 The SPD is intended to provide some of the finer detail which is to be set out within what will become the Councils policies. It is intended to follow, expand and deliver on the requirements within the NPPF is in conformity with both Government and Local planning policy and guidance.

B.2 THE WEST SOMERSET LOCAL PLAN 2012—2032

B.2.1 The Draft Preferred Strategy February 2012 and June 2013 of the New Local Plan sets out the Councils approach to the New Local Plan and states at paragraph 1.4 that:

...the Local Plan sets out a vision for the sustainable development of the District's communities over the next 20 years and provides the means of achieving it through the application of strategic planning policies...

The new Local Plan will set out which of the saved West Somerset District Local Plan policies are being superseded by which new policies.

The Local Plan will provide a context for other planning policy documents which will assist with the implementation of the Local Plan's vision.

B.2.2 This SPD is one of the 'other planning policy documents' envisaged within the draft Local Plan.

B.2.3 Given the importance of good design set out in both the NPPF and the new Local Plan, it is considered that an SPD setting out the Councils 'robust and comprehensive policies' on Design - meeting the aims set out in the bullet points of paragraph 58 of the NPPF - would be extremely beneficial for:

- the Council in terms of setting

standards of what is expected;

- the community in terms of the quality of development which they can expect to see; and
- the development industry, where the SPD would help provide a 'practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency' (a further core land-use planning principle set out in paragraph 17 of the NPPF).

B.2.4 The emerging new Local Plan sets out a number of Strategic Objectives at paragraph 6.1 of the Draft Preferred Strategy namely:

- Strengthening the roles and functions of Minehead as the District's main centre, and Watchet and Williton as rural service centres;

- Implementation of types and quantities of development in

locations appropriate to meet the requirements of the Strategy based on the evidence and engagement;

- Increase self containment within Minehead, Watchet and Williton;
- successfully managing flood risk in implementing new development at Minehead, Watchet and Williton;
- Make a step change in the provision of affordable housing to meet identified local needs;
- Make a significant reduction in Co2 emissions for the Local Plan area;
- Create an aspirational, enterprising and entrepreneurial culture within West Somerset;
- Develop the quality of the tourism offer within the Local Plan area;
- Protect and enhance biodiversity in the Local Plan area;
- Conserve and enhance the character of historic settlements, buildings and landscapes;

-Deliver high quality design in new development which will contribute to the area’s heritage in a positive way

At this point in the process of producing the new Local Plan it is not envisaged that these objectives will be materially altered

B.2.5 While it will be important for all development proposals to contribute towards meeting these strategic objectives, the first 6 objectives above are likely to be influenced most by larger development proposals.

B.2.6 The new Local Plan envisages, within Policy SC1 that new development will be concentrated in the Districts main centre, Minehead, and in the rural service centres of Watchet and Williton. Proposed policies MA1 and MA2, WA1 and WA2, and WI1 and WI2 set out levels of growth

that these settlements will be expected to deliver as well as high level objectives for such growth.

B.2.7 There are a range of other objectives set out within policies of the Draft Preferred Strategy of the new Local Plan such as:

- SC2 | Strategic Development (rates of housing delivery)
- SC3 | Appropriate Mix of Housing Types and Tenures
- SC5 | Self Containment of Settlements
- SC6 | Mixed-Use Development
- EC1 | Widening and Strengthening the Local Economy
- TR1 | Access to and from West Somerset
- TR2 | Reducing reliance on the Private Car
- CF1 | Maximising Access to Recreational Facilities
- CF2 | Planning for Healthy Communities
- CC1 | Carbon Reduction

- CC2 | Flood Risk Management
- CC 5 | Water Efficiency
- NH1 | Historic Environment (contributing to the regeneration of the Districts communities)
- NH2 | Landscape Character Protection
- NH3 | Nature Conservation and the Protection and Enhancement of Biodiversity
- NH4 | Green Infrastructure
- NH6 | Pollution, Contaminated Land and Land Instability
- ID1 | Infrastructure Delivery

B.2.8 This SPD is intended to set out in more detail how larger development is expected to take on board the objectives set out in the Local Plan to provide additional levels of certainty to Members, officers, local communities and importantly developers.





C.1 THE DESIGN PROCESS

C.1.1 The approach taken to design decision making in this SPD is one which adopts a step by step process towards the evolution of a scheme, based on an appreciation of the context of the development and the site involved.

C.1.2 Local distinctiveness is not derived from a cosmic veneer applied to standard building designs, rather it is the sensitive response to the site and setting of a development. A response based on a perceptive appraisal of the site and its setting will suggest how the land forms, existing landscape features, buildings and structures are to be utilised. The microclimate and orientation of the site, the relationship to the scale, layout, form, uses and materials will all influence the scheme.

C.1.3 The development will of course be primarily influenced by development economics and a perceived local need which is to be addressed. However, this has to be balanced with local policies and the 'capacity' of the site and its surroundings to absorb new development.

C.1.4 Different contexts will suggest different approaches to the capacity for change:

(i): Some contexts will be of such sensitivity, quality and scale where DEFERENCE is required (i.e. strict adherence to the grain, footprints, frontages, heights, materials and possibly styles).

(ii): Others may have a definite positive character, but are robust enough that whilst continuity of street frontages and the established sense of enclosure and scale is maintained,

some CONTEMPORARY interpretation of the street scene and some modest intensification could be envisaged.

(iii): There will be a limited number of locations where EXPANSION, IMPROVEMENT and CONTRAST may be appropriate. Typically these may be in centres where improvement and change would help to regenerate a locality. These areas may be pocket locations in settlements where buildings are in poor condition and / or are inefficiently laid out. In other situations they may be in peripheral locations where expansion may ensure that existing developments would benefit from improved facilities, public transport and environmental improvements.

C.1.5 In all cases developers and their agents will need to justify their approach through careful appraisal of context as summarised in the diagram on pages XX

-XX and sections XX and XX of this SPD, and then the adoption of General Design Principles as set out in Section D.

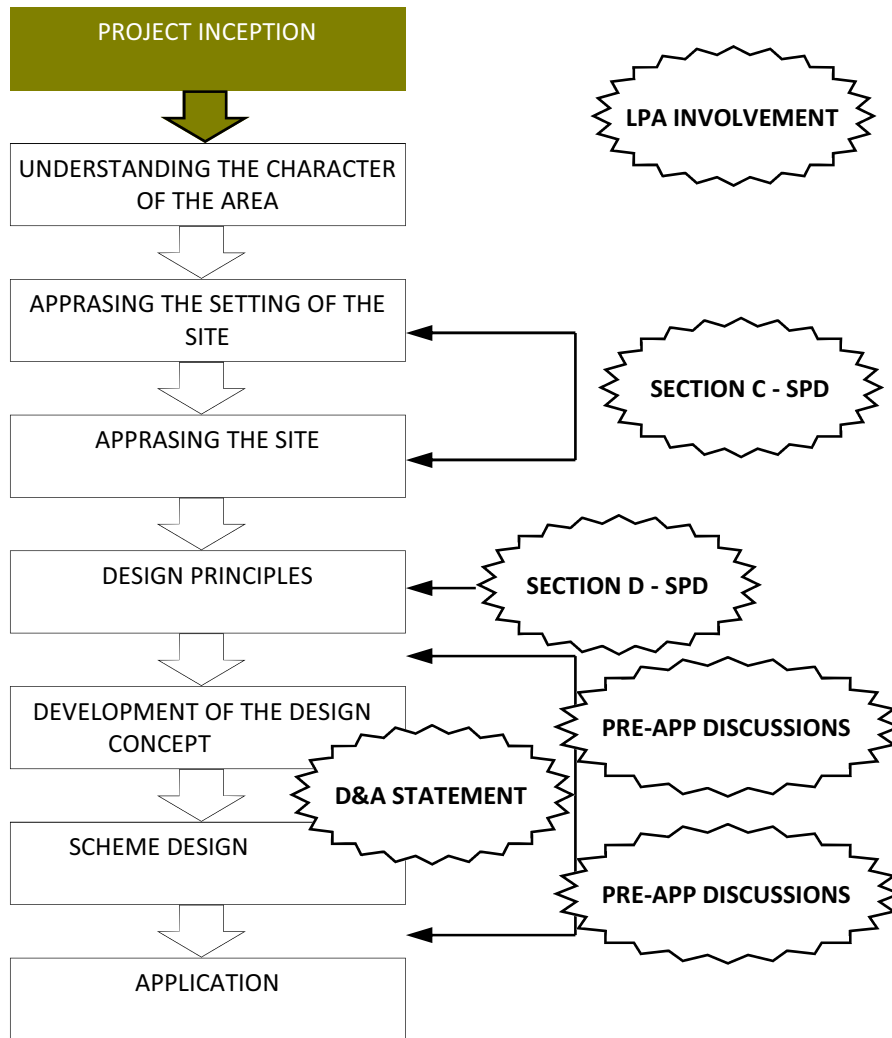
C.1.6 This justification based on appraisal should be the focus of any pre-application discussions and should form the basis of the Design and Access Statement to be submitted with a planning application.

C.1.7 The stages of the Design Process and the involvement of the Local Authority in that process are set out in the diagram opposite.





THE STAGES OF THE DESIGN PROCESS



WORKING DRAFT 18.11.13



INITIATING THE DEVELOPMENT

Optimum choice of site / location for proposals?

What are the constraints and policy likely to allow?

Have local needs / aspirations been assessed?

Will a Section 106 agreement be needed?

Are there potential external benefits to the proposals? e.g. stimulus to enhancement / regeneration in the vicinity?

Would the development have appropriate critical mass for viability of uses?

UNDERSTANDING THE CHARACTER OF WEST SOMERSET

How would the proposals relate to the general scale and pattern of development?

How would the proposals relate to the Character Area to which they are related?

What is the sensitivity to change in the area?

How would the proposals relate to the wider landscape, topography, tree-belts, drainage patterns?

What is the likely impact on strategic view, landmarks, etc?



APPRAISING THE SETTING OF THE SITE

How would the proposals relate to adjacent development, landscape, community?

Are their designations affecting the setting? (conservation areas, listed buildings, archaeology, SSSI's, ANOB, National Park etc.)

Where are the nearest facilities, shops, bus stops, play areas etc.?

How will the site be accessed sensitively?

What is the character of the built form, townscape, grain, density, materials, age, trends?

What is the character of the landscape setting and views into and out of the site, exposure etc?

What constraints are likely? (noise, air quality, odour, flood risk etc.)



APPRAISING THE SITE

How would the proposals affect the privacy or amenity of neighbours?

Does the layout or topography present renewable energy options?

Are their designations affecting the site itself? (conservation areas, listed buildings, IDB/EA bylaws?)

Are their public rights of way or potential links on the site?

Where are the suitable access points?

Assess the value of existing buildings or structures for local distinctiveness and embodied energy?

Assess the landscape and biodiversity value of existing trees, hedgerows and water courses

What constraints are likely? (contaminated land, drainage)





DESIGN PRINCIPLES

What is the **ROLE** of the development within the setting of the site? e.g. a focal point, a gateway, an edge, to reinstate continuity, a landmark, a key corner etc.

What aspects of the **SETTING** of the site influence the character of the development? e.g. townscape, uses and condition, materials.

What aspects of the **SITE** influence the character of the development? e.g. Existing valuable features,

- Trees/hedgerows, aesthetic value and space definition.
- Buildings: local distinctiveness, character and quality

Create a **LEGIBLE HIERACHY** of spaces, places, massing, enclosure, density, plot coverage, routes and connections.

Ensure:

- Active Frontages
- Parking does not dominate
- Privacy
- Space for collection and delivery
- Appropriate Materials and Elevations: aesthetic, locally distinctive

What is the **ROLE** of the development within the Setting of the Site? e.g. neighbourhood focus, social diversity, cohesion, opportunities? Increase biodiversity?

What aspects of the **SETTING** of the site influence **SUSTAINABILITY**? e.g. proximity to local facilities, bus stops, employment.

What aspects of the **SITE** foster sustainability? e.g. orientation, biomass, exposure or shelter, SUDS potential, soil quality, existing buildings (embodied energy, viable space use).

Take advantage of the opportunity to provide life-time homes

Create a **GREEN & ACTIVE INFRASTRUCTURE** of green spaces, wildlife corridors, shelter belts, play and recreation, walking & cycling routes.

Ensure:

- Safer streets and Spaces
- Accessibility for all
- Adequate space for well-being (internal and external)
- Space for recycling
- Appropriate Materials and Elevations: thermal performance, robustness

PREPARING A DESIGN AND ACCESS STATEMENT

Demonstrate how:

-The scheme has been developed as a result of appraisals, design principles and pre-application discussions.

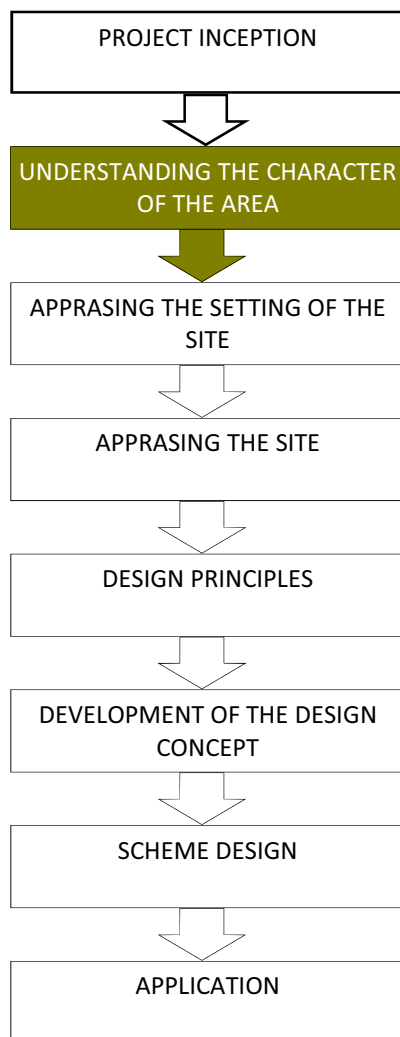
-The scheme has responded to local needs and issues. Was consultation on design aspects undertaken?

Does the development take advantage of the opportunity to provide extra sustainability features or offer privacy etc.

Is their a clear rationale for demolition?

For large scale development - has the scheme taken all available opportunities to develop sustainable communities in accordance with part E of this SPD?





C.2 THE CHARACTER OF WEST SOMERSET

C.2.1 Understanding and responding to character and local distinctiveness is a fundamental component of the delivery of successful developments.

C.2.2 Prior to appraising a development site and its immediate settings, it is important to understand its context, in order to establish the general pattern and scale of development, the influence of the landscape, longer views and skylines, settlement patterns predominant materials and the relative sensitivity and capacity for change.

C.2.3 This part of the SPD aims to identify those positive aspects of character which should be taken into account when considering the location, type and arrangement of development.

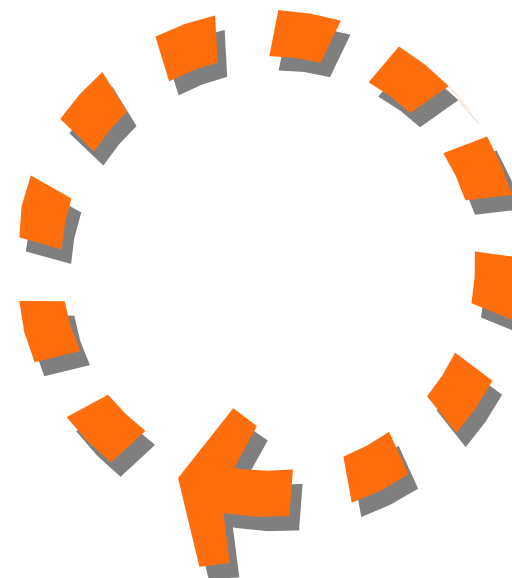


Fig 1: The Inter-related components of the physical character of West Somerset

Some settlements and Parishes have more detailed information relating to their localities, it is important that these are taken into account by those proposing development.

Parish Plans: Produced by local communities, these outline the characteristics of a locality which are valued by its residents, and set out the aspirations of the community.

Parish Priorities: Most Parish and Town Councils have produced Parish Priorities which set out objectives for the use of Section 106 contributions within the area.

Conservation Areas: The Council has produced maps of the District's Conservation Areas—these can be used to identify opportunities and key features of an area.



C.2(a) LANDSCAPE CHARACTER OF WEST SOMERSET

C.2.4 The landscape character of West Somerset can be split into seven landscape character areas. Whilst each sub-area exhibits its own characteristics, they cannot be taken as distinct entities as landscapes merge imperceptibly into one another.

C.2.5 The seven landscape character zones are as follows:

- Blue Anchor Bay
- Central West Somerset
- The Quantock Vale
- Central Quantocks

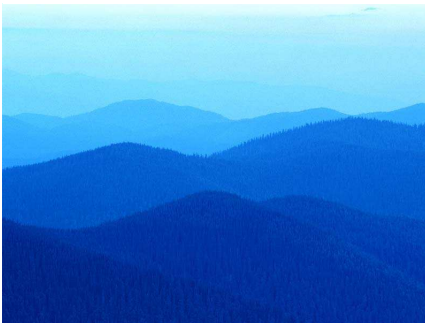


Fig 2:

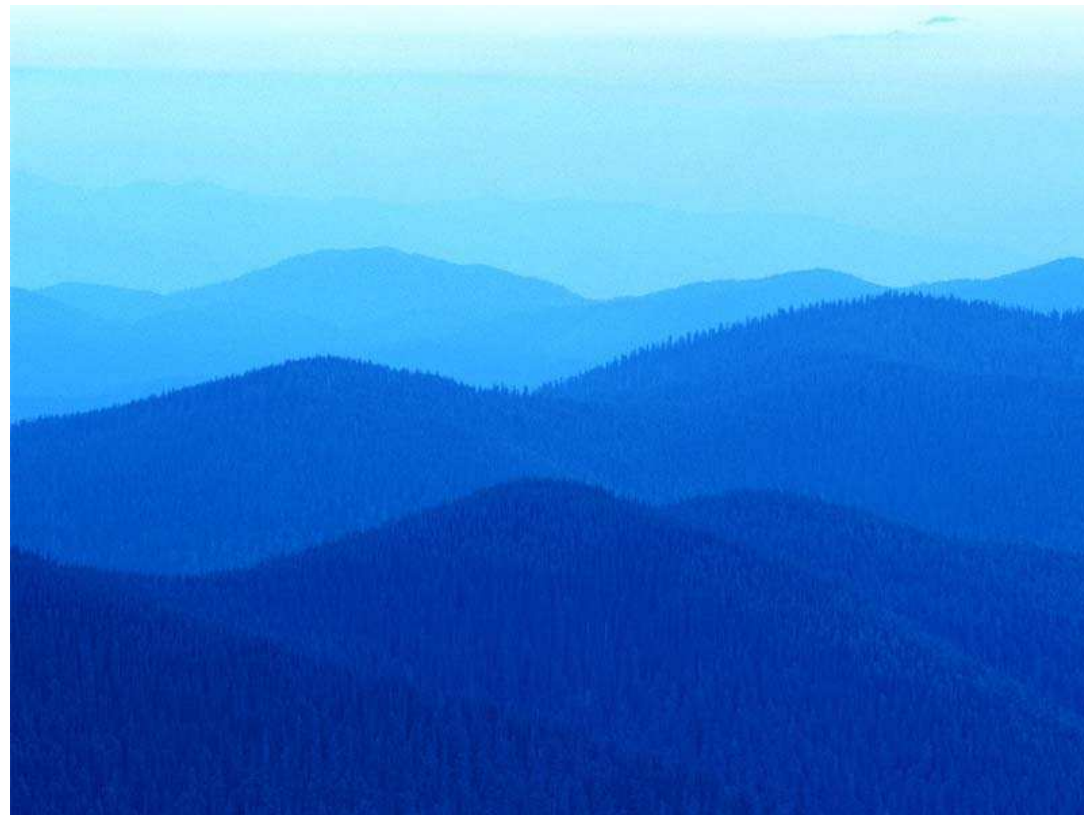
- Doniford Stream and Quantock Fringe
- The Brendon Fringe
- The Southern Flanks of Exmoor

C.2.6 Within this section of the SPD each of the seven land-

scape areas are summarised for the purposes of informing and guiding the development process.

C.2.7 Each character area is analysed under standard headings:

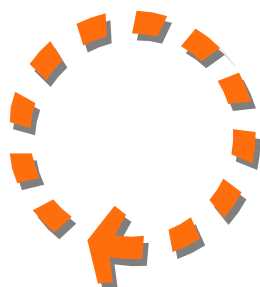
- General Description
- Vegetation
- Settlement Form
- Building Form and Predominant Types
- Materials
- Views
- Sensitivity to Change



**CHARACTER AREAS:
BLUE ANCHOR BAY****General Description**

C.2.8 Blue Anchor Bay comprises the Districts main settlement of Minehead and contains areas of marsh and very low lying land with the steep slopes of the Exmoor Fringe to the south and west of Minehead. Blue Anchor Bay includes the Minehead to Blue Anchor coastline incorporating both Dunster Marsh and Blue Anchor, which is characterised by coastal sand dunes, including Dunster Beach.

C.2.9 This relatively flat open area running seawards from the lower slopes of Exmoor.



The slopes are formed from sandstone and their higher reaches are capped by woodland, some of which is ancient in origin.

C.2.10 The coastal plain, which is formed of alluvium and marl, comprises mainly improved grassland with some arable land. There are important remnants of salt marsh and, most notably, coastal grazing marsh made up of permanent pasture intersected by drainage channels. Due to its high water table and history of tidal flooding the area was little developed other than the ancient hamlet of Dunster Marsh.

C.2.11 Since the latter part of the 1900s there has been a more pronounced change with the construction of the Minehead Golf Course and Railway, the limited expansion of Dunster Marsh, the development of caravan and chalet sites at

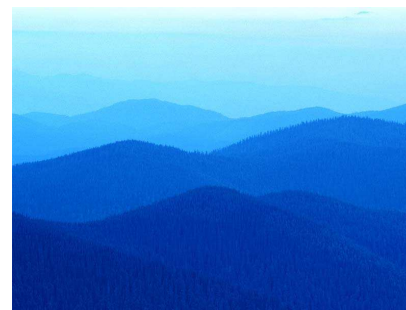


Fig 2:

Blue Anchor and Butlin's Holiday Resort at Minehead.

Vegetation

C.2.12 The predominate vegetation in Blue Anchor comprises deciduous woodlands, linked by species-rich hedges, hedgerow trees, small woodland copses, vegetated shingle, drainage ditches and pasture.

Settlement Form

C.2. The Districts main settlement of Minehead was historically focussed around The Avenue, Railway, Quay and North Hill inc. St Michaels Church. Significant and radiating inter-war and post-war suburban

extensions have dramatically increased the size of the settlement between the older parts of Minehead and Alcombe.

C.2. Blue Anchor is a traditional linear settlement leading back from the sea front across the railway line along Carhampton Road although a number of properties lie to the east and west along cul-de-sacs.

C.2. Dunster Marsh was historically a linear village leading from the Medieval settlement of Dunster to the sea, the village has seen significant post-war back land development located to the east of Marsh Street.

Building Form and Predominant Types

C.2.

Materials

C.2.



Views
C.2

parts of the town would need to be handled very sensitively.

Sensitivity to Change

C.2 Minehead is clearly the Districts main centre and additional growth within the District will be concentrated here. Large scale development will take place south of Hopcott Road, the Councils approach to which is set out in more detail within Chapter F of this SPD. Given the compact nature and historic pattern of growth additional development is likely to be located on the edges of the settlement. Good links to local facilities will be vital to ensure that sustainable modes of transport are used by residents. Windfall development will be expected to follow patterns and principles of development set out in Chapter F of this SPD. A number of Conservation Areas are located in Minehead and Alcombe, development in or need to these

C.2. Blue Anchor is characterised as a Secondary village where development to meet clearly identified local needs may be permitted. Any development would need to be located within the current envelope of the village in an infill format as far as possible.

C.2. Dunster Marsh is also characterised as a Secondary village where development to meet clearly identified local needs may be permitted. Any development should be located within the current envelope of the village or adjacent to it to minimise additional development within the landscape.

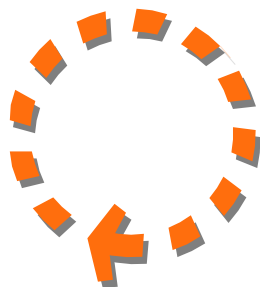


CHARACTER AREAS: CENTRAL WEST SOMERSET

General Description

C.2.8 Central West Somerset includes the settlements of Carhampton, Old Cleeve, Sampford Brett, Washford, Watchet, Williton and Withycombe. Containing an area of rolling and undulating hills (although rarely over 100 metres) Central West Somerset is divided by numerous streams in generally narrow but not exceptionally steep valleys. The area takes in the coastline between Blue Anchor and St. Audries.

C.2.9 This area runs between the Quantocks and the fringes



of the Brendon Hills and Exmoor from the Taunton Vale in the south to the Bristol Channel. The geology is principally Marl (clay and lime) and sandstone outcrops with Alluvium around the main rivers. It is characterised by gently rolling hills dissected by rivers and mainly used for pasture despite often being good quality agricultural land. It is well hedged with numerous small woods and copses.

C.2.10 The underlying geology of the coast from Blue Anchor to Watchet is Marl, Shale and Siltstone forming generally higher land with a pronounced cliff face to the sea. Apart from the ancient harbour town of Watchet and the village of Williton, the topography and traditional agriculture heritage have resulted in a settlement pattern of relatively small attractive villages and hamlets nestling within the rolling countryside.

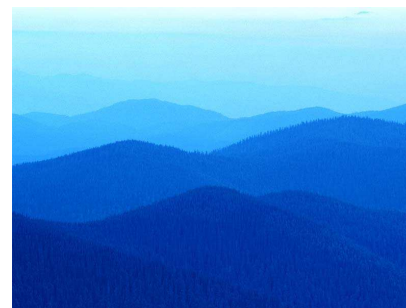


Fig 2:

Vegetation

C.2.11 The predominate vegetation in Central West Somerset comprises hedges, floristic hedge banks, hedgerow trees of oak and ash. Secondary includes woodland with coniferous planting, tree groups and copses, Sabellaria Reef and Fly Orchid.

Settlement Form

C.2.12 The rural service centres of Watchet and Williton are the focus of Central West Somerset. Watchet's historic urban core is focussed around the marina, mineral line and railway. In the 20th Century sig-

nificant suburban extensions have increased the size of the town between South Road and Doniford Road in primarily grid and cul-de-sac forms.

C.2.13 Williton has a historic core focussed around the High Street and Church. The village has unusually long liner routes leading into the centre with significant post-war suburban extensions to the north of the village.

C.2.14 The village of Carhampton is based on a historic grid pattern of development with modern additions.

C.2.15 Washford is a linear settlement between its railway station and the junction of **Station Road and xxx** with several pockets of historic development focussed around the school, interspersed with more modern dwellings.



C.2.15 Old Cleeve is characterised by two lanes leading away from its Church and Withycombe is clustered around its Church.

C.2.16 The village of Sampford Brett is located to the south of Williton and is a linear settlement with some 20th Century back land development to the south of the main street.

Building Form and Predominant Types

C.2.

Materials

C.2.

Views

C.2

Sensitivity to Change

C.2 Watchet and Williton are defined as Rural Service Centres and will see significant growth. Planned growth will occur on allocated sites with

windfall development expected to strengthen the role of the town/village centres and improve links to provide more opportunity for locally based journeys by foot and cycle. Development in the centre of Watchet would need to take account of the Conservation Area which is centred on the historic core of the Town.

Windfall development will be expected to follow patterns and principles of development set out in Chapter F of this SPD.

C.2. Carhampton and Washford are characterised as Primary Villages and development will be expected to contribute to wider sustainability benefits of the local area and where it meets a clearly identified local need. Any edge of settlement development will have to be handled particularly sensitively given the dispersed nature of development on the edges of routes into and out of these

villages.

C.2. Old Cleeve is characterised as a Secondary village where development to meet clearly identified local needs may be permitted. Development will also have to take account of the Conservation Area located within the centre of the village, very sensitive infill development may be acceptable where proved necessary.

C.2. Neither Sampford Brett or Withycombe are expected to accommodate growth within the Local Plan.

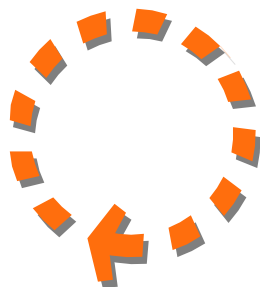


CHARACTER AREAS: THE QUANTOCK VALE

General Description

C.2.8 The Quantock Vale includes the settlements of Stogursey and Holford, it is characterised by a flowing lowland landscape of wide valleys and gentle hills (rarely over 60 metres), cliffed coastline, marsh and salt marsh. The area takes in the St. Audies to Hinkley Point coastline.

C.2.9 The Quanoock Vale runs between the Quantock Hills AONB and the coast lies the eastern part of West Somerset. As the land slopes gently away from the Quantocks to relatively flat,



lower lying land the geology changes from Sandstone to Lias, with Alluvium at the estuary. There is a greater preponderance of arable land than in the rest of the Plan area. Tree cover is important for wildlife and has reduced over time due to Dutch Elm Disease and the removal of hedgerow and roadside trees.

C.2.10 There are a number of small, attractive hamlets with buildings and structures constructed of local sandstone and Lias. The largest settlement is the historic village of Stogursey which saw expansion in the 1960-70s in association with the development of Hinkley Point power station and be significantly affected by the construction of Hinkley Point C in the period to 2020.

Vegetation

C.2.11 The predominate vegetation in the Quantock Vale

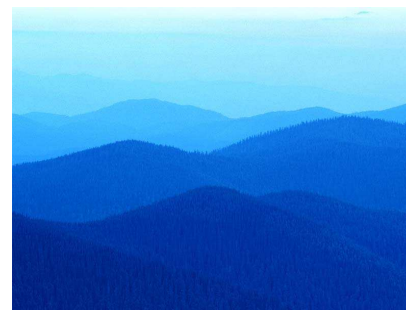


Fig 2:

comprises mixed species hedges, hedgerow trees, small and medium sized deciduous woodlands and copses, coastal flora including Fly Orchid, Sabellaria Reef, grazing marsh and pasture fields.

Settlement Form

C.2. Stogursey forms a hub of activity towards the east of the District and serves a number of smaller hamlets being the 4th largest settlement in West Somerset. The village take a linear form away from its historic core which is centred on a small market square up from the Church located at the eastern end of the village and the

castle immediately to the south of the market square. Some more recent back land development radiates out from the core behind development fronting High Street and Tower Hill towards the Victory Hall.

C.2 Holford appears a simple Linear village however, more historic development is located on the Quantocks side of the settlement towards Hodders and Holford Combe with more modern development on the coast side of the village.

Building Form and Predominant Types

C.2.

Materials

C.2.

Views

C.2

Sensitivity to Change

C.2 The village of Stogursey is



characterised as a Primary Village which and development will be expected to contribute to wider sustainability benefits of the local area and where it meets a clearly identified local need. Development would be expected to support and sustain the role of the village core which is largely covered by a Conservation Area.

C.2. Holford is characterised as a Secondary village where development to meet clearly identified local needs may be permitted. The historic development towards Hodders and Holford Combe lies within a Conservation Area. Within the current envelope very sensitive infill development may be acceptable where proved necessary.



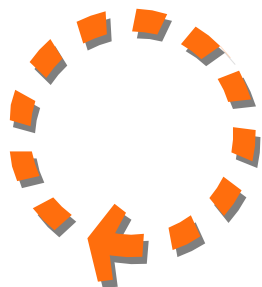
CHARACTER AREAS: CENTRAL QUANTOCKS

General Description

C.2.8 The Central Quantocks includes the settlements of Kilve, East and West Quantockshead as well as the element of the Quantock Hills AONB within West Somerset.

C.2.9 The Quantock Hills rise to smooth rounded summits incised by deep combs and covered by heathland and moor of high aesthetic and wildlife value. To the west a scarp slope drops steeply from the upland plateau.

C.2.10 This range of sandstone hills rises to a height of approx-



imately 350 metres. It forms a long, narrow ridge with open summits of heather moorland or heath, dissected by steep-sided wooded combs.

C.2.11 The upper margins of these woodlands have fluctuated with changes in grazing pressure but their core areas are ancient in origin. The western side presents a steep slope down to the West Somerset Vale, which comprises of wooded scarp with both broad leaved copses, forestry plantations and vestiges of medieval and later designated parkland landscapes. Below the main break of slope the hills are fringed by an apron of enclosed pasture. In comparison the eastern sections form a more undulating landscape of hedged pasture land often surrounding the long wooded combs.

Vegetation

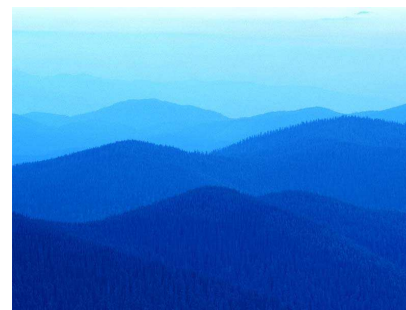


Fig 2:

C.2.12 The predominate vegetation in the Central Quantocks comprises heath and moor on the plateau with wind sculpted oaks, semi-natural woodland, coniferous plantation, beech hedges and parkland.

Settlement Form

C.2. Kilve is located to the north of the Quantock Hills and is a clustered settlement focussed on the community facilities at the centre of the village located on an east-west / north-south cross roads. More modern development is located to the north west of the village with linear development along Sea Lane and some more dis-

persed development along Pardlestone Lane travelling up onto the Quantocks Hills.

C.2. The village of West Quantockshead is also located between the Quantock Hills and the coast with St Audries Park providing a significant landscape feature to the north of the village. The majority of built form within the village is contained by the A39, The Avenue and Staple Lane with some additional linear development along Luckes Lane.

C.2. The traditional and largely preserved Estate Village of East Quantockshead is dispersed along a series of small lanes to the north of the A39.

Building Form and Predominant Types

C.2.

Materials

C.2.



Views

C.2

to the south of the village, close to the existing core to limit visual intrusion into the countryside.

Sensitivity to Change

C.2 The village of Kilve is characterised as a Primary Village and development will be expected to contribute to wider sustainability benefits of the local area and where it meets a clearly identified local need. Development would need to be focused in and around the main core of the settlement to help support and maintain the existing community based facilities.

C.2. The village of East Quantockshead is not expected to accommodate any growth within the Local Plan.

C.2. West Quantockshead is also characterised as a Primary Village and development will be expected to contribute to wider sustainability benefits of the local area and where it meets a clearly identified local need. The A39 provides a significant barrier to development and growth should be located

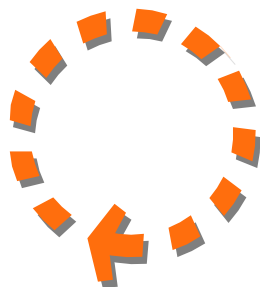


CHARACTER AREAS: DONIFORD STREAM AND QUANTOCK FRINGE

General Description

C.2.8 The Doniford Stream and Quantock Fringe includes the settlements of Bicknoller, Crowcombe and Stogumber. It is a distinct linear area enclosed by the Brendon Hills to the west and Quantocks eastwards, broken and incised by small streams with scattered woodland, steep slopes from Quantock plateau to the sea.

C.2.9 Along the western boundary of the Quantock Hills AONB there is a narrow (rarely more than 2-3 field width) agricultural fringe, which is only divided



from similar land use in the valley of Doniford Stream by the A358 route. The Doniford Stream runs in a valley that follows the synclinal basin between the Quantock and the Brendon Hills. Landform of the Doniford Valley is typified by steep hills cut by incised tributary streams between Bicknoller and Stogumber, although upstream, particularly on the eastern side the hills are more gentle.

C.2.10 All the soils are reddish in colour and both Argillic brown earths and non-alluvial loamy brown earths occur. The former mainly to the east of the stream and have a clay enriched subsoil, which leads to slight seasonal water-logging.

Vegetation

C.2.11 The predominate vegetation in the Doniford Stream and Quantock Fringe comprises secondary mixed woodlands,

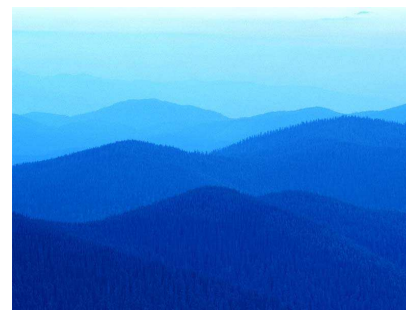


Fig 2:

hedges, floristic hedge banks and hedgerow trees of Oak and Ash as well as copses.

Settlement Form

C.2. The village of Bicknoller is located at the bottom of the western slopes of the Quantock Hills. The village is served off the main A358 and its form is based on the junction of Trendle Lane and Church Lane and the surrounding narrow streets arranged in a historic grid pattern. Recent development in the post war period has continued the grid pattern centred on the Church Lane / Trendle Lane junction with some very limited development

off of Church Lane.

C.2. Crowcombe is also located on the lower slopes of the Quantock Hills with a strong linear form with almost all development fronting and served by the main street. Crowcombe Court lies to the north of the centre of the village. The Church forms the central focus of historic core of the village with a valuable green space at its heart.

C.2. The village of Stogumber is a clustered settlement centred on the junctions of Station Road, Hill Street, Vellow Road and Old Way around the Church which lies just off the main thoroughfare off Hill Street. Linear forms of development extend away from the centre of the village with some more recent cul-de-sac development in and around the centre of the village which houses important local, community



based facilities.

Building Form and Predominant Types

C.2.

Materials

C.2.

Views

C.2

Sensitivity to Change

C.2 Bicknoller is characterised as a Primary Village and development will be expected to contribute to wider sustainability benefits of the local area and where it meets a clearly identified local need. Any development would have to be very sensitively handled given the historic pattern of buildings within the village, although it should follow the recent pattern of development centred on the Trendle Lane / Church Lane junction rather than in a linear form moving

away from the village given the high sensitivity of the landscape within the Quantock Hills AONB.

C.2. Crowcombe is also characterised as a Primary Village where development will be expected to contribute to wider sustainability benefits of the local area and where it meets a clearly identified local need.

The very strong pattern of buildings within the village limits opportunities for back land development. Very sensitive in fill or limited additional linear development may be acceptable where it supports local facilities.

C.2. The village of Stogumber is also characterised as a Primary Village where development will be expected to contribute to wider sustainability benefits of the local area and where it meets a clearly identified local need. Development should be

focussed around the centre of the village to reinforce the clustered nature of the built form and to support locally important facilities. Development proposals in this area will have to take account of the Stogumber Conservation Area which extends over the heart of the village.

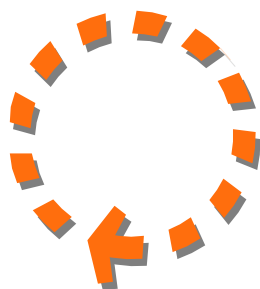


CHARACTER AREAS: THE BRENDON FRINGE

General Description

C.2.8 The Brendon Fringe includes the settlements of Brompton Ralph, Huish Champflower, Monksilver, Skilgate and Upton. The area comprises land over 150 metres to the east of the Brendons and all south west section of the West Somerset around Clatworthy Reservoir, the latter is ancient agricultural landscape of small fields with hedges and often associated small woodlands.

C.2.9 The geology of this area is sandstone, slate and shale. The area has an overall



physical unity, provided by the River Tone, the broad-leaved trees that line the water's edge, and the rounded hills above which are grazed by sheep and cattle.

C.2.10 Included within this area is Clatworthy Reservoir, which is flanked to either side by trees. The road leading to the reservoir provides a sense of movement through this otherwise still, visually impenetrable landscape. To the north-east of the reservoir, the land gradually slopes towards the West Somerset Vale with small settlements primarily built in sandstone and slate, some of which have experienced development this century. Unfortunately the siting of some of the buildings in the last 20 years has obscured views into and out of the villages, and interrupted the continuity of the landscape.

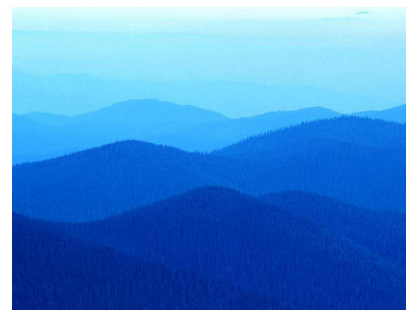


Fig 2:

Vegetation

C.2.11 The predominate vegetation in the Brendon Fringe comprises Beech hedges, hedgerow trees, floristic hedge banks, coniferous woodland, copses, small areas of Purple Moor Grass and rough pasture.

Settlement Form

C.2. The village of Brompton Ralph is a largely dispersed settlement with small groups of houses intermingled with farm buildings and open spaces located along the rural roads into and through the village.

C.2. The other small settlements within the Brendon

Fringe including Huish Champflower, Skilgate and Upton are also very rural dispersed settlements.

C.2. Monksilver is larger than the other villages however, for planning purposes the majority of the village lies within Exmoor National Park. Development within the village is clustered either side of Front Street.

Building Form and Predominant Types

C.2.

Materials

C.2.

Views

C.2

Sensitivity to Change

C.2 Of the settlements in the Brendon Fringe only Brompton Ralph benefits from any designation within the Local Plan



being characterised as a Secondary Village where development to meet clearly identified local needs may be permitted. Any such development would have to reflect the dispersed nature and very rural nature of development in this area.

C.2. The remaining settlements within the Brendon Fringe are not expected to accommodate any growth within the Local Plan. Their very rural location and sensitive landscape setting would prohibit development for housing. Any agricultural / commercial development would need to be very sensitively sited and be able to be readily assimilated into the landscape.

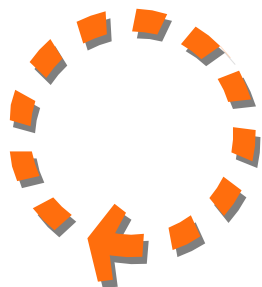


CHARACTER AREAS: THE SOUTHERN FLANKS OF EXMOOR

General Description

C.2.8 The Southern Flanks of Exmoor includes the settlement of Brushford. It is a diverse landscape of hilly land to about 300 metres in the west, broken by steep-sided tributary valleys, significant groups of woodland, small fields and scattered farms.

C.2.9 This area in the south west of West Somerset borders the southern reaches of Exmoor National Park. It is separated from the rest of West Somerset by the National Park. The landscape is formed from a



geology of slates and shales, and includes large tracts of high open countryside giving way to the deep, heavily wooded river valleys of the River Exe and its tributaries. The historic landscape of fields, hedges and banks has been altered most dramatically over the last century as a result of agricultural intensification. Modern farm chemicals and the enlargement of fields for mechanisation brought about arable farming and intensive pasture in areas of poor and often marginal soils such as this.

C.2.10 Within the last 10 years removal of hedgerows and roadside banks and chemical improvement of previously unimproved pasture still occurs but at a much slower rate. Afforestation, however, is an growing concern. The planting of forests on the thin acid soils of Exmoor has had a significant

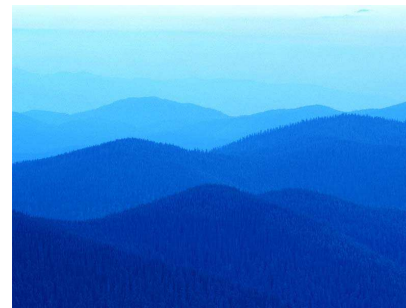


Fig 2:

effect on landscape diversity and visual amenity; ancient woodlands have been replaced by plantations and the form of the landscape has been changed. Woodland names usually give some indication as to their age. Plantations and coverts are more recent in origin than copses or coppices. The latter are long established, perhaps even ancient woodland areas. The majority of settlements follow the river valleys although individual dwellings can be found in the more remote, exposed upland areas.

Vegetation

C.2.11 The predominate vegetation in the The Southern Flanks of Exmoor comprises Floristic banks and verges, coniferous and mixed woodland, mixed species hedges, water meadows/seasonal pasture and small tree groupings.

Settlement Form

C.2. The only significant settlement within the Southern Flanks of Exmoor within the Local Planning Authority area is Brusford. The settlement is arranged as an informal interconnected grid. The vast majority of the built form is compact within the grid pattern and is located to the west of the B3222. Development is relatively continuous within the built up area but comes to an abrupt end along New Brusford Road.

Building Form and Predominant Types

C.2.



Materials

C.2.

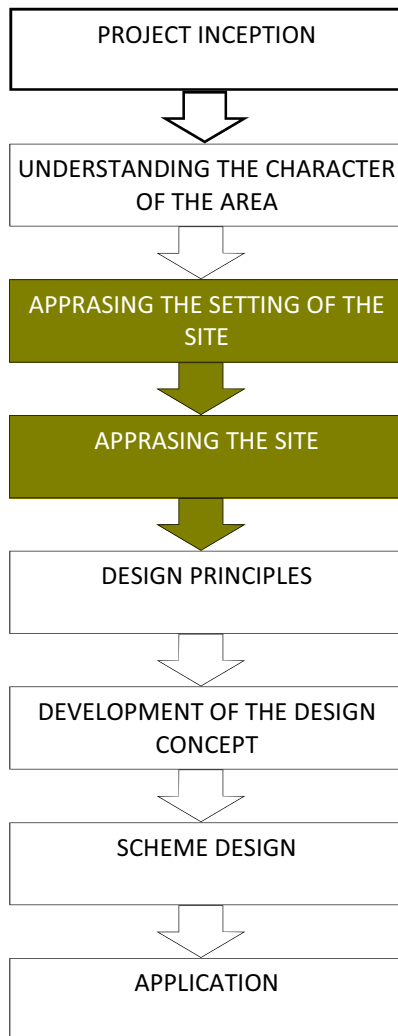
Views

C.2

Sensitivity to Change

C.2 Brushford is characterised as a Secondary Village where development to meet clearly identified local needs may be permitted. Any development would need to be contained within the existing built up area and follow the irregular grid pattern well established within the settlement.





C.3 APPRAISING THE SITE AND ITS SETTING

C.3.1 Having considered the site in the wider context of its Character Area (section C.2), it is essential that the site and its more immediate setting is evaluated. This process is necessary to ensure that any development:

- (a) Ensures the efficient use of land
- (b) Relates sympathetically to its physical and social context
- (c) Minimises its carbon footprint
- (d) Enhances biodiversity
- (e) Through placemaking, creates an attractive, safe, convenient and healthy environment
- (f) Ensures that it is locally distinctive and makes a positive contribution to the area

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Appraisal means the evaluation, not merely the description, of the salient factors.

C.3.2 Site and Setting Appraisals will make a key contribution to a Design and Access Statement.

C.3.3 Good appraisal involves both desktop study and on-location surveys. Desktop studies should include planning history of the site, planning policies relevant to the site and its setting, noting and considering the impact of all designations (including for instance the setting of a Listed Building), areas likely to flood etc.

C.3.4 The study of historic maps and digital data can reveal information on previous uses, building footprints, critical boundaries, lost street alignments, place names etc.

C.3.5 On-location survey is essential to assess the qualities of

the immediate townscape, critical views and skylines, changes of level, condition, building heights, quality and importance of vegetation, materials and relationships with adjacent buildings and spaces etc.

C.3.6 It is important to remember that the time of day and or year will affect the perception of the site or setting. The notation sheets on pages 36 and 37 provide a graphical method of surveying and a prompt for the surveyor. They are also understood by the Councils planning team and can be useful when discussing design concepts at the pre-application stage.

C.3.7 Whilst every site or setting may not have obvious positive aesthetic character, its location, orientation, relationship to neighbouring development, relative spaciousness and/or restrictions etc. will be factors which will and should influence the design process.

Townscape Appraisal



Fig 2:
Not Everything is apparent on a Map

The Site in its Setting

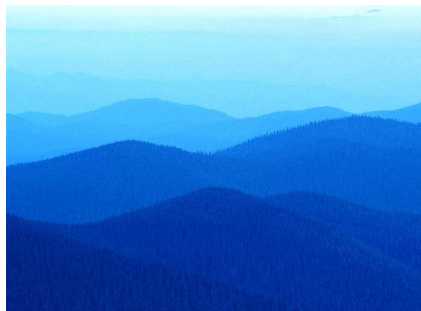


Fig 2:
A site with Great Potential?

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A site with Significant constraints?

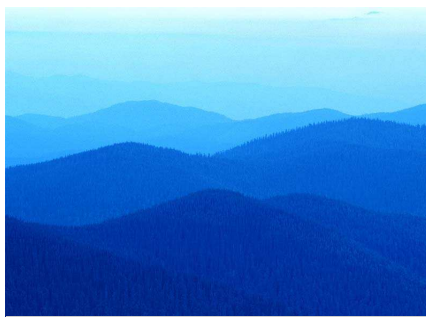


Fig 2:

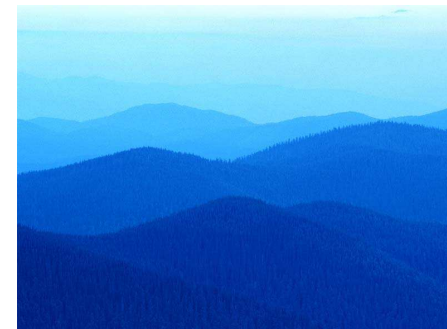


Fig 2:





Appraisal of the Setting of the Site

C.3. Consider the area within 250-500 metres of the site. It may be necessary to consider a longer distance in some places, to establish whether any proposed development would have a detrimental effect on the skyline of the settlement or obscure views of, for instance, a church tower.

C.3. The questions below indicate the type of factors to be taken into account in context/site appraisal:

- Is the site at the entrance to a settlement?
- Is it or could it be a focal point?
- Is it situated at the interface between the settlement and the countryside?
- Is it an exposed or very visible situation?
- What type of development would benefit the settlement?
- Do any designations affect the setting of the site?

Case Study: Site on the edge of a settlement

General:

Small village extended in stages, mainly in 20th Century; lying above a river valley and adjacent to the main through road.

Character Areas:

1. Core centred on triangular market place: the focus of all routes. Continuous street frontage on back edge of footpath, with subtle changes of direction. 2-2.5 burgage plot development. 50° roof pitches.
2. Modest late Victorian expansion. Semi detached deep plan houses 35°-40° roof pitch, white render, slate roof. Low hedge and wall boundaries, some in poor condition. Average set back 2.5m
3. Interwar council housing in vernacular revival style. Rendered. Long low profile, small mullioned windows. 'Garden City' type front green which creates sense of arrival to vil-

lage.

4. Entry point to settlement. First glimpse of settlement and site. Cottages and trees frame the view.

5. Early post war suburban extension. Semi detached houses set back. Road dominated, gentle curves. Inward looking. Back gardens face all external boundaries. Low pitched roofs, large areas of glazing, tile hanging panels. Little reference to

locality. Primary school has significant impact on valley setting.

- Bus stops/distance from site
- Safe route to school
- Local facilities (hatched)

Principal views:

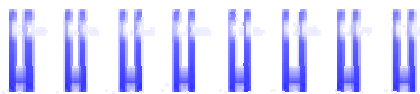
- (a) Wide view of setting of village and valley. Site visible
- (b) View from other side of valley. Site is prominent
- (c) Glimpse of church tower from site



Appraisal of the Site

C.3. The site appraisal notation should help to identify characteristics, constraints and opportunities which should influence the layout and massing of development

C.3. Referring to the case study opposite, the site appraisal notes below illustrate the features which could influence the form and layout of development on the site.



The site has a slight fall to the north, more noticeable within 30 metres of the river. Lowest point on the NW corner of the site.

Existing Use: fields to redundant farm. Hedgerows in good condition on north, west and north east boundaries,. Railing on southern boundary. Close boarded fencing of various types on east boundary.

Good clump of trees to north of site. Some good hedgerow trees on west side of site. Substantial redundant barn (weather boarded on a brick base with pantiles). Associated remnant brick boundary broken down in parts. North and west sides of site could be exposed to winder winds.

Essential to respect the privacy of neighbours on eastern boundary. Potential for foot and/or vehicular connection to existing estate road to east, to create safe and direct route to school.

Optimum site entry point on centre of southern boundary (good sight lines)

Other factors likely to influence design decisions include:

- Designations covering the site or parts of the site such as Conservation Area. Whether there are TPO's in existence or whether the site is considered to influence the setting of a Listed Building
- Constraints such as way-leaves for utilities (sewers or

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- power lines), contamination, footpaths, areas of possible archaeological interest etc.
- Environment Agency and Drainage Board bylaws and

- riparian ownership responsibilities
- All public rights of way crossing or adjoining the site must be shown

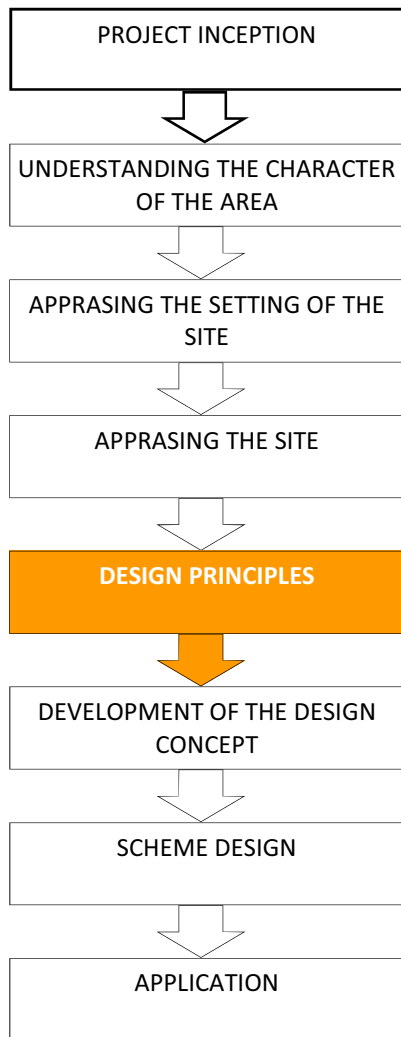




SITE APPRAISAL NOTATION					
	Vehicular Access to the site Outline = Potential Solid = Existing		View to Landmark or other Feature. Point is viewpoint		Existing Tree To remove secondary growth/ poor condition
	Pedestrian Route Outline = Potential Solid = Existing		Panoramic view From the site or view of the site from off-site		Pond/lake
	Connection: Existing Pedestrian/Vehicular or Visual		Important Building Line Or Frontages facing/enclosing the site		Marshy area/liable to flood
	Connection: Potential		Need to create Building Line or Frontage		Watercourse & culvert
	Nearest Bus Stop(s)		Intrusive/unsightly frontage Or other feature		Site Boundary
	Hazard e.g. underground chambers, contaminated land		Existing important corner (right) or Create keynote corner (left)		Above Eye-level Wall
	Abrupt change of level Figure refers to height/depth in metres		Existing building/structure Appropriate for re-use		Transparent boundary e.g. site viewed through railings
	Slope (arrows face down slope) Gentle Medium Steep		Existing building/structure Shell/ruin. Retain or demolish?		Private gardens/ Areas facing site boundary
	Roofline quality on/off site Ridgeline (Hill) quality on/off site		Existing Tree To retain		Source of Noise State type and frequency
	Landmark on/off site Outline = Minor Solid = Major		Hedgerow Note condition/height habitat/biodiversity potential		Power Line: Overhead or underground



	Vista A general view/panorama		Slope/Gradient		Street Section Sections convey relative enclosure. select at least 5 Characteristic locations Identify on map (A-A etc) No's = Storeys
	View To specific object/landmark		Edge Physical/Visual boundary defining an area e.g. railway, restricted access property, water etc.		Pinch Point Street funnels to a 'gateway' to another space
	Glimpse e.g. down an alley or through a gateway		Significant Building line Historic and/or interesting frontages		Pivotal corner Defining/framing spaces acting as a hinge between spaces
	Sequential Views Related views unfolding as on moves through the townscape		Rhythm Regular patterns of windows, plot widths, columns etc		Texture Interesting roof, wall or street surfaces
	Deflected View The eye is led round a bend, inviting exploration		Transparency Activity visible from the street Active Frontage		Area defined by Noise (ff) or Quiet (pp)
	Terminated View View along a street 'stopped' by a building		Connected/Linked Spaces Linked by view and foot routes		Disorientation Lack of legibility in townscape
	Landmark Major Landmark Local Landmark Significant building in a street etc		Trees of Townscape significance		Intrusive feature Inappropriate building (scale, materials etc)
	Skyline interest		Area of Special sense of Place e.g. Churchyard, market etc		Lack of enclosure The townscape falls apart
	Crest/Ridge		Nodal Point Place of Congregation and/or crossing of busy pedestrian routes		



D.1 PLACE MAKING

D.1.1 This section of the SPD seeks to establish the principles and different elements that underpin the process of designing a particular scheme. This section is equally relevant to a proposal for a single dwelling as it is to much larger schemes.

D.1.2 The principles of Place-making should now be familiar amongst those seeking consent for schemes, they have been enshrined in Government Guidance and good practice guides for a number of years. This section of the SPD sets out these principles within the context and scale of West Somerset.

D.1.3 The interface of a development with its setting, Section C.3, indicates how the context and site ought to be appraised to establish its character, positive, negative or neutral. It is likely that the site boundaries

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will interface with different facets of the immediate environment (e.g. residential street on one side, rear gardens on another, open field on another).

D.1.4 Given the overall character of the immediate locality, if you are designing a scheme, it is appropriate to consider, in the context of the setting of the site, should the development:

- Defer to the high quality of the streetscape and architecture, in terms of scale, grain, building lines, heights, materials and perhaps architectural style?
- Adopt a contemporary re-interpretation of the well established pattern of streetscape as above, but without the need to be so literal in its response to precedent?
- Contrast, intervene where

the existing environment is degraded, or would be enhanced or regenerated by an imaginative approach in terms of mix of use, massing, scale, layout, scale and elevational design. Note that, in this scenario, the positive aspects of the existing townscape should not be eroded or 'threatened'.

Designers should also consider what role would the proposals play within the immediate setting of the site:

- Would it form the edge to the settlement? If so should that edge be hard (buildings dominated) or soft (buildings interspersed with trees or landscape)?
- Should it be outward or inward looking? Unless there are special circumstances to the contrary it would be usual to assume that it would be outward looking to the public



- realm i.e. have active frontages, and more inward looking where the privacy of adjacent properties needs to be respected.
- Would the development form a Gateway to a settlement or a locality? The design of a gateway could be quite bold, but often it simply requires careful consideration or the use of a projection of a building to the back edge of the pavement to create a ‘pinchpoint’ or to frame the area defined as a gateway.
- Would the development or part of the development need to create a pivotal corner? In many situations a road junction or poor quality development has eroded the design potential offered by corner sites. Historically these were ‘celebrated’ in townscape terms by the use of well designed buildings.
- Would the development Terminate or Deflect a major view? The site may be at the head of a street or a public space. The development should be designed at the appropriate scale, with this long or important view in mind.
- Would the development assist in reinstating valuable street continuity and enclosure? Perhaps the site has a gap frontage, or it is occupied by inappropriate development which disregards well established building lines.
- Would the development frontage (or part of it) be a focal point, generating people based activity? This may require the appropriate space outside entrances.
- Where would the site entrance be located? This should be legible, convenient and safe for pedestrian and vehicle access, yet it should not break the continuity of important street frontages. The entrance may incorporate some of the preceding items such as focal points, pivotal corners etc.
- Should the development create a skyline interest or conversely should it have a low profile in places, in order to defer to important views within the townscape or landscape?





D.2 BUILT FORM CHARACTER

D.2.1 The consideration and positive response to previous Section C—The Design Approach and D.1 Placemaking should naturally lead to a clear, evidenced and convincing Built Form Character. The following sections are intended to set out, drawing on good, locally distinctive examples, how streets and spaces, housing types and elevational treatment, materials and boundary treatment can come together to form locally distinctive, good quality places.

D.2.2 The Council firmly believe that the principles expressed can be applied successfully from a single dwelling up to the largest housing sites. As set out throughout this SPD the Council is committed to ensuring the delivery a high quality built form character and will use the principles set out within this SPD to judge the acceptability of plan-

ning proposals.

D.2.3 Clearly, as expressed in Section A of this SPD the guidance is not intended to constrain innovative design solutions or to induce narrow and unimaginative results and the Council welcomes discussion with developers seeking to deliver such schemes.

D.2.4 However, it is important to reiterate that standard 'anywhere' development proposals are unlikely to be supported by the Council and this SPD will be used to resist such inappropriate development.

D.3 STREETS AND SPACES





D.3 URBAN CENTRES

D.3 URBAN TERRACE

D.3 MEWS

D.3 SUBURBAN AREAS

D.3 URBAN LANES

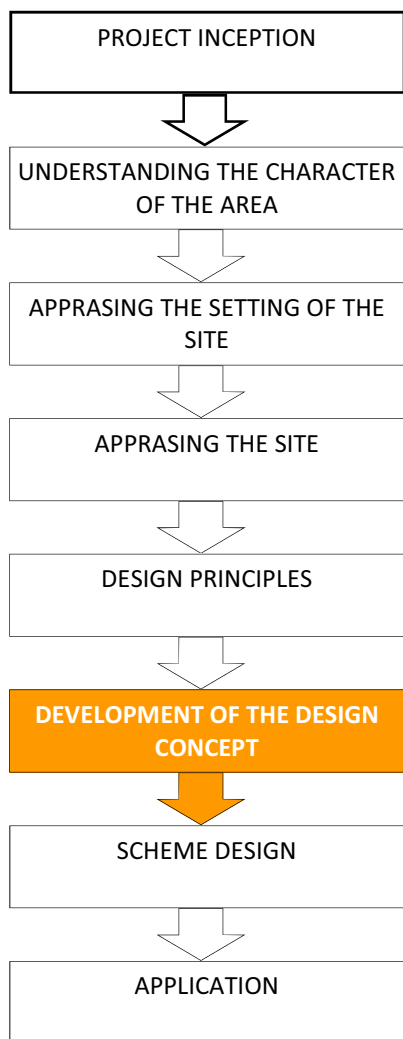
D.3 VILLAGE STREETS

D.3 VILLAGE LANES

D.4 HOUSING TYPES AND ELE-
VATIONAL TREATMENT

D.5 MATERIALS AND BOUNDA-
RY TREATMENT





WORKING DRAFT 18.11.13

D.6 DEVELOPING A DESIGN CONCEPT

D.6.1 Understanding the Character of the Area (Section C.2), appraising the Setting of the Site and the Site itself (Section C.3) and developing the appropriate Built Form Character (Sections D.1 to D.5) should, along with the aims of the development, lay the foundations for the overall Design Concept.

D.6.1 The concept should, in the case of larger developments, be developed in conjunction with the local community and stakeholders (see Section G.2). This could be, for example, result from workshops or 'planning for real' exercises where the concept can evolve towards a finalised scheme design. The way in which that process can and should involve the Council is set out in Section G.1.

D.6.3 At the early stages a con-

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cept will be more about the principles of the scheme following on from the appraisal and character assessment work set out in earlier parts of this SPD, it is likely to become more developed through discussion and the involvement of stakeholders.

D.6.4 A Concept Diagram can be used, utilising notation, to

identify certain design objectives can be presented and discussed rather than moving too quickly to a rigid layout and solution which cannot easily be adapted to take on board the outcomes of engagement.

D.6.5 The example below is based on the same site as used on [pages 34 and 35](#), using the notation found on [page XX](#).





DESIGN CONCEPT NOTATION

	Continuous frontage On back edge of pavement (number refers to storeys)		Informal urban enclosure		Need to Create Connection Between existing and proposed development
	Continuous frontage Set back from pavement		Informal urban green		Footpath
	Indented frontage		Nodal point/meeting place State type e.g. market, concourse, school entrance, bus stop		Building orientated to maximise solar gain
	Discontinuous frontage		Area of spatial identity/sense of place		Pedestrian area
	Avenue or boulevard		Bus stop Or other transport interchange		Trees Of townscape significance
	Significant corner		View corridor		Shelter belt/wildlife corridor e-existing p-proposed
	Building terminating vista		Landmark - Existing - Proposed		Balancing pond/reedbed filter ponds
	Chicane in street Used for speed reduction		Skyline/roofline interest Potential or proposed		Water front/quayside
	Intersection		Skyline/roofline interest Existing		Location for Public Art
	Formal square Or other enclosure		Active street frontage		Re-use Of existing building or structure



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D.6.6 The appraisal of the Context and Site should, in accordance with D.1 Placemaking, suggest some initial features which will assist in establishing the character or identity of the development, from which to develop a design concept for the scheme.

D.6.7 The issues to consider will typically include the following:

- An entry point to the site: should this be wide or narrow, formal or informal in character?
- An appropriate frontage to the site: should this be continuous or semi continuous, active or screened?
- Other boundaries: should development back onto these or look outward? Should the boundaries be permeable?
- Existing groups of trees, hedges or structures within the

site: could these become focal points around which to group buildings or can they give a general 'grain' to the development? (see explanation below)

- Changes in level and gradient: will the slope of the site be used to define spaces, create different built form, aid natural drainage measures?
- Skyline and views: will development have a potentially positive or negative effect on the skyline? Are there major view lines which need to be taken into account?
- Built form in the locality: does the massing, layout, scale and materials in the area suggest appropriate approaches to the design concept?
- Hierarchy: for larger schemes should there be a

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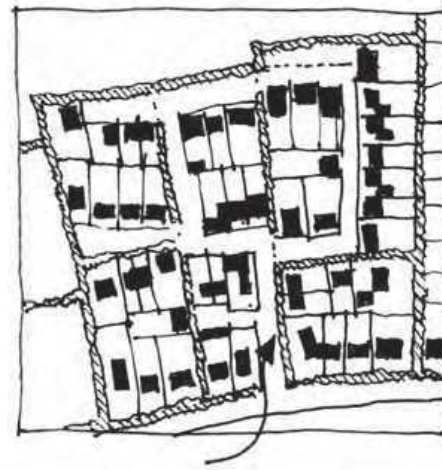
hierarchy of spaces and places, from major to minor streets, large to small scale, range of heights, lower to higher density, enclosed to open space? (see Section D.1 Placemaking)

This list is indicative only. Specific sites may have more or different factors to be consid-

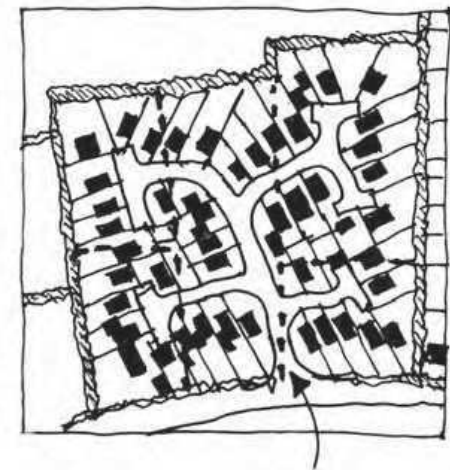
ered and reflected upon.

D.6.8 The density of the development, its variety or similarities, formality or informality, predominance of landscape or built form, its height and architectural style and materials, will also contribute to its character, which should be expressed in the Design Concept.

Taking advantage of the 'grain' of the existing site features:



(1) The 'grain' of existing field boundaries should influence plot and street layout, shelter and phasing



(2) The existing 'grain' is ignored, resulting in loss of hedgerows and habitats, potential drainage problems and lack of identity

D.7 LARGE SCALE BUILDINGS

D.7.1 This section of the SPD seeks to set out the approach to larger scale buildings including, but not limited to:

- Supermarkets
- Warehouses
- Industrial units
- Larger scale offices
- Schools
- Sports and fitness centres
- Leisure and entertainment centres
- Garden centres
- Large agricultural buildings

D.7.2 Conventionally these buildings have common characteristics:

- Deep plan: usually on both axes, with wide spans on single storey buildings (often multiples of spans)
- Low rise: usually single storey with high eaves / parapet

- Elevations of horizontal emphasis with flat or low pitched roofs and an absence of windows, either or conversely, some types have extensive areas of glazing comprising large sheets of glass. In both cases the scale and proportions of these buildings are considerably larger than most building types
- Most building types require high levels of visibility and recognition for commercial reasons. They also have a relatively short design life, which influences the choice of cladding materials.
- These buildings, either individually or in groups are often free standing, set back from the boundaries of the site and sited in a landscaped setting.
- Due to their deep plan and enclosed nature, most build-

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ings rely on a high level of artificial lighting and air conditioning

- They rely (in most cases) on high levels of commuting, predominantly by car and thus require large areas of car parking, often in front of the building
- Many types are built to accommodate servicing by heavy goods vehicles (or agricultural vehicles) and the vehicular supply chain. Therefore, they require large areas, with generous roadways and junctions to accommodate vehicle movements

D.7.2 For the reasons above deeper plan buildings generally have a high carbon footprint given their location, siting, layout, design, materials and accessibility. Moreover, due to their size and scale, they present considerable challenges

for the planner and designer in the relationship of the building with its rural, urban or edge of settlement setting, in terms of their physical or visual impact.

D.7.3 In acknowledging these issues, the design solution for a large scale building can stimulate and offer opportunities to create imaginative solutions to the development of these buildings (especially in sensitive environments and/or locations) in terms of location, layout and siting, materials and appearance, use of renewable energy generations, reduction in carbon footprint and the relationship with their setting.

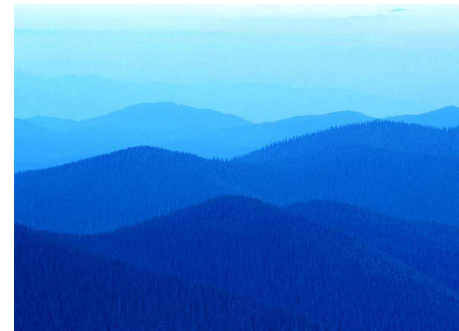


Fig.

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D.7.4 For large scale buildings the following broad issues will require resolution during the design and planning process:

- Can the application of relevant elements of the principles of good urban design and architecture be used to minimise the impact of traditional solutions to these types of buildings?
- Can this form of development be as accessible as possible to all the likely users, by a variety of modes of movement other than the car?
- Can the isolating effect of these (often) mono use developments and their siting—including the fringe of associated car parking, be avoided?
- Can the size, scale and grain of these buildings be modified to relate sympathetically to their urban, edge of settlement or rural environment?

- In urban and edge environments: can the often blank walls of these buildings be avoided or considerably minimised, in order to create active frontages where they address the public realm?

D.7.5 The Council will expect, in accordance with **Policy XXX of the Local Plan, that new buildings achieve a BREEAM 'Excellent' rating**, where site and contextual considerations allow.

D.7.6 Buildings should maximise the use of sustainable construction in terms of structure, locally sourced building materials, the use of renewable energy, water and drainage efficiency, and waste management.

D.7.7 Development proposals in urban and edge of settlement locations should demonstrate that they are accessible by forms of movement other than the car. This aim should

influence the location, siting, layout, mix of uses and provision of facilities/contributions for the development. All parking generated by the development must be accommodated on site.

D.7.8 The footprint and form of proposed buildings should be designed to optimise daylighting and natural ventilation.

D.7.9 Development proposals should ensure that whilst they address the objectives set out in paragraphs D.7.5 to D.7.8, that they also ensure that the Placemaking principles set out in this SPD are an integral part of the evolution of the design.

D.7.10 In urban areas, relationship to the existing facilities, roads and access infrastructure will be critical, with access by large vehicles having a potentially negative impact on the street and in terms of noise, light etc. Streetscene consider-

ations will require an analysis of the existing urban form, grain, heights, frontages and views.

D.7.11 In rural and urban fringe areas, long views and skylines will require analysis. Consideration of the use of existing landscape features, colour, glare and materials will also be critical. Landscape design should also compliment the setting, rather than the application of a standardised approach to large scale buildings and car parking areas. Consideration of shelter and the continuity of biodiversity will also need to be factored into the solution.

D.7.12 In Urban Areas:

- Development must contribute to street continuity and enclosure (section D.1). In particular buildings should be sited to respond positively and continue the established street frontage(s) and/or should recognise their role in the street

- e.g. at corners or when terminating views. It may be that a building volume may be so large that it might be set in the 'backland' behind existing frontage development but use small structures and good access links to knit the development into the streetscene.
- The scale and grain of large volume buildings can often be assimilated into the street scene by the elevational treatment of structural bays and columns, subdividing large expanses of the elevation to reduce the dominance of these large dimension elements. Bay widths addressing the street scene should be as narrow as feasible. The horizontal emphasis of elevational design should be avoided as this tends to draw attention to the excessive width of these buildings. These measures should aid the buildings relationship to the grain of the surrounding buildings and spaces
 - Large areas of flat roofs should be avoided for the same reasons as above. The need for rooflights, photovoltaic arrays, natural ventilation/heat exchange cowls etc. should contribute towards roofline interest
 - Buildings should be designed to have active frontages facing the public realm: thus windows, display windows, escape doors, entrance doors and signage should be located at ground floor level
 - Groups of large footprint buildings should share and enclose external space to optimise the use of parking space, facilitate walking by avoiding the need to drive between adjacent sites/buildings and minimise the impact on the streetscene and landscape more generally
 - The requirements for heavy vehicles to enter a site, to make deliveries and to leave a site can have a significant impact on the layout of a site, its interface with the street and junctions and street widths of surrounding streets. Vehicle tracking, minimum radii and sight lines (as advocated in the *Manual for Streets*) and the requirements above, should be utilised to the full
 - Where supermarkets or warehouses are proposed, it is generally necessary to create separate access for delivery vehicles and customers, both in cars and on foot, to minimise the risk of accidents. However, it is recognised on more restricted (often urban) sites, local separation is not always possible, or desirable, in terms of streetscene impact. In these situations it may be possible to manage deliveries when the unit is closed to the public although residential amenity will also need to be carefully considered. Otherwise the siting of the manoeuvring area for HGV's should not conflict with the pedestrian routes through the site or be located adjacent to pedestrian entrances. It may be necessary to reduce the speed of HGVs to walking pace to minimise conflict
 - Bus stops in sight of covered seating areas / the front of the unit, bicycle parking, electric car charging points, priority parking and easy, legible and direct pedestrian, bicycle and wheelchair access should all take priority over the private car access point(s)
 - Rainwater harvesting and the management of water run-off from paved surfaces is a significant design consideration, given the large areas of roofs and surfaces. In appropriate or inadequate drainage must be

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- avoided
- Buildings accommodating offices and educational uses in particular will require high levels of daylight and natural ventilation. It is likely therefore that they will be characterised by wings of a relatively shallow depth, in varying configurations. These forms should lend themselves to being accommodated within the existing streetscape, having regard to the other principles in this Section
 - Considerations of orientation for sunlight and the utilisation of solar energy should be balanced with the need of the proposed building to relate to the grain of the site shape and boundaries, the grain of adjacent properties and of the street frontage. The relationship of the building to the street should not result in awkward 'spaces left over'
 - The need to achieve a low profile will be important in many locations. Low pitches or segmental barrel vault roofs may be preferable to flat roofs. Green roofs should be considered in most locations especially where the roof will be highly visible
 - The need for adjustable sun screening, creation of stack ventilation, the use of dense materials to ensure passive heat-store characteristics, and the use of building materials from sustainable sources, should be used to create elevational interest and also as a means to assimilate with the existing urban fabric
 - Waste management storage and processing facilities are likely to be significant issues requiring adequate space, screening and access. These should be shown on the design and layout drawings
- D.7.13 In rural and urban fringe areas:
- The contours, boundaries and degree of visibility of the site or parts of it, will be major considerations in the layout and form of the proposed development
 - The analysis of the landscape of the context and the site should establish the character of the proposals and suggest where existing hedgerows, lines of trees and single trees may be used to define boundaries and edges both at the fringe and within the site. If bunds are appropriate and are not an intrusive feature in the landscape context, they should be planted to reinforce the existing landscape character
 - It should be recognised that extensive areas of on and off site set-aside are likely to be required by the Council for landscape mitigation
 - Careful landscape design should be used to ensure appropriate boundary enclosure, create shade for building elevations and parked vehicles, to oxygenate the air in parking areas, to screen and shelter spaces, to maintain and enhance biodiversity, and to ensure sustainable drainage
 - Colour and reflectance of the buildings should be considered, especially the effect on long distance views. Colour schemes should aim to:
 - Integrate with the landscape
 - relate to sky colours, or
 - reduce the building bulk by expressing its constituent parts





E.1 HOUSING MIX AND AFFORDABLE HOUSING

E.1.1 The Council require, in accordance with **Policy SC3**, that residential and mixed use development proposals provide a mix of housing sizes, tenures and types to meet the demonstrated needs of the area's communities. This will include provision for the area's aging population with the provision of both bungalows and lifetime homes.

E.1.2 The Council require that both market housing and affordable housing provide a mix of housing sizes to ensure the balance and structure of communities is maintained and that different forms of accommodation are offered irrespective of tenure. **Expand as appropriate depending on policy text.**

E.1.3 The Council require that affordable housing is located on the same site as market housing where at all possible and that it

forms an integral part of the development i.e. the scheme should be 'tenure blind'. In most cases the affordable housing should be 'pepper potted' throughout the site, although the Council will take into account the practicalities of managing and maintaining units when agreeing the appropriate spatial distribution of units on a site.

E.1.4 **Policy SC4** of the Local Plan requires that a minimum of percentage of affordable housing to market housing will be 35% : 65%.

E.2 EMPLOYMENT AND JOBS

E.2.1 The Council, via **Policy EC1** of the Local Plan, supports the principle of new development, redevelopment and conversion proposals for all types of employment generating activities and direct such development towards existing and extant premises and sites.

E.2.2 Where new employment generating premises are proposed the Council will expect development to follow the guidance set out in part D.7 of this SPD where larger premises are part of the development.

E.2.3 For smaller scale employment related development located either in town/village centre locations or in edge of settlement locations the principles of site appraisal and scheme design will need to be followed as set out at sections C and D.6.

E.2.4 Irrespective of whether the development includes new build, re-development or conversion the Council will expect development to be designed to minimise the impact on the amenity of existing neighbouring uses.

E.2.5 Where the Local Plan has allocated larger sites for mixed use development in Minehead,

Watchet and Williton the Council would expect the development of the employment related elements of the scheme to be planned and delivered at the same time as the accompanying residential development and via a comprehensive Masterplan approach (see Section G.4 of this SPD). The type of accommodation and its use should respond positively to the Councils Economic Strategy (2011) and early engagement with the Council via pre-application discussions (see Section G.1 of this SPD) can and should include discussion on these elements of the mixed-use scheme.

E.3 HIGHWAYS / SHARED SPACES / ACCESS PRINCIPLES

E.3.1 The Council will expect any Highways solution within a development scheme to firstly respond positively to 'The Design Approach' set out in Section C of this SPD. As such the location of an access should be derived from the site appraisal process



E.4 LOCAL FACILITIES

and not purely from a ‘Highway Design’ solution. Clearly it will be important for any access solution to be safe and convenient for road users but the priority on the larger development sites within the District will be for walking and cycling.

E.3.2 The County Council have a range of Guidance available to help design appropriate solutions and it will be important to use this SPD alongside that guidance to deliver design solutions.

E.3.3 The Council will expect the philosophies set out in Manual for Streets and Manual for Streets 2 to help deliver more contextually sensitive designs. Where possible designs should build upon the principles set out in Section D.3 to ensure layouts are both legible to the user and remain locally distinctive. This SPD has deliberately been designed to positive interact with the guidance set out in Manual for Streets and Manual for

Streets 2 to provide local guidance and interpretation.

E.3.4 Early discussions on highways solutions should involve both the Council and Somerset County Council to ensure that a commonly understood approach is followed—this will deliver long term speed and certainty within the decision making process.

E.3.5 Overall, the Council will expect developers to show good levels of connectivity between development sites and local footpaths and cycle paths as well as to and from local facilities —with off-site connections provided where necessary—to ensure that more sustainable transport measures are utilised wherever possible. This approach is set out in **Local Plan Policy XXX** and supported by the **County Council’s XXX Strategy**



E.5 RIGHTS OF WAY / GREEN INFRASTRUCTURE

E.5.1 Development proposal of 10 dwellings / 1000m² of commercial space or more will be expected to demonstrate, in accordance with Local Plan policy NH4, that:

- They protect and enhance green infrastructure assets affected by and surrounding the development and take opportunities to improve linkages between green corridors;
- Where they overlap with or will affect existing green infrastructure 'nodes' or corridors, such assets are protected and enhanced to improve public access and use;
- Where opportunities exist, development proposals provide improvements to the green infrastructure network that benefit biodiversity through the incorporation of retained habitats and by the creation of new areas of habi-

tat; and

- They provide robust delivery mechanisms for, and means of ensuring the long-term management of, green infrastructure

E.5.2 Development that will result in the loss of existing green infrastructure may be supported where replacement provision is made that is considered to be of equal or greater value than that which will be lost.

E.5.3 where new development may have an adverse impact on green infrastructure, alternative scheme designs that minimise impact must be presented to the Council for consideration before the use of mitigation measures (e.g. off-site or through financial contributions elsewhere) is considered.

E.6 FLOOD AND WATER MANAGEMENT

E.6.1 The Flood and Water

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Management Act 2010 (FWMA) creates a significant change in the way that development gets approval prior to construction. When fully commenced (currently anticipated in April 2014), it will put in place a system that allows developers to build Sustainable urban Drainage Systems (SuDS) knowing that many can be adopted by a SuDS approving body in the same way that, for example, the County Council adopts roads. Policies CC5 and 6 in the Local Plan relate to water efficiency and water management.

E.6.2 The Act sets out a system of approval whereby drainage strategies for sites should be submitted for review to a body known as the SuDS Approving Body (SAB). If the drainage strategy is approved and the system is intended for adoption by the SAB, the SAB will then inspect the construction of the SuDS as they are built, with a view to ultimately

adopting a safe and fully functioning system. It is important to note that, once the Act comes into force, if approval is not given for the drainage strategy then development will not be allowed to start on site, regardless of whether or not the site has planning permission.

E.6.3 The relevant sections of the FWMA are expected to be enacted during 2014 following the release by Defra of finalised National Standards. SuDS Approving Bodies must use these standards to determine whether drainage strategies meet requirements and, if they do, such strategies should be approved. The National Standards are expected to leave some design elements open to local interpretation.

E.6.4 Defra may choose to phase the requirement for development to obtain SuDS approval. In this case major development may need this specific approval

straight away but minor development may not require it until perhaps 2015 or later. This section of the SPD aims to ensure a higher level of consistency across these enactment periods.

E.6.5 As confirmed in paragraphs 99-104 in the NPPF, flood risk is a very important consideration in the determination of planning applications. There are often significant interactions between different sources of flooding, and in some locations surface water flooding may present a much greater risk to the development than risk from main rivers. For these reasons the consideration of surface water flood risk, and hence drainage, cannot be removed from the planning process, just because of the requirement for sustainable drainage approval. For planning permission the Council must be content that the development will not increase risk from any sources of flooding and that an appropriate and long lasting drainage system

can be designed. The SuDS Approving Body will however be looking for more detail about how the system will function, its construction and how it will be maintained.

E.6.7 By using this section of the SPD to assist with the designing of sites for planning permission, both the Council and developers can hopefully enable a much smoother transition to the new drainage regime and help to prevent conflicting planning and drainage approvals.

E.6.8 It is important that there is consistency between the development’s flood risk assessment and drainage strategy. Developers may want to consider working with the same design experts/consultants for both pieces of work. For example, if a flood risk assessment identifies surface water flood risk to a site, the Council and partners will expect to see the

management of this flood risk addressed in the design of the site and its drainage system.

E.6.9 The layout and design of SuDS and other flood risk management measures should be considered at the beginning of the development process using the design principles set out in this section of the SPD. A key element to successful SuDS is integrating the design into the development master plan/site layout at an early stage, while also considering how SuDS will be maintained. Good SuDS design also requires early and effective consultation with all parties that are involved in the approval process including the city council, the Environment Agency and relevant stakeholders.

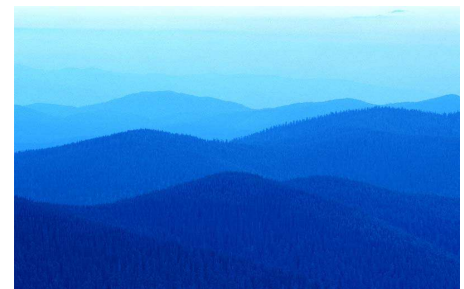
What is Sustainable Drainage?

E.6.10 Sustainable drainage means managing rainwater (including snow and other pre-

cipitation) with the aim of:

- Reduced damage from flooding
- Improve water quality
- Protecting and improving the environment
- Protecting health and safety
- Ensuring the stability and durability of the drainage system

E.6.11 The primary function of SuDS is to provide effective drainage. SuDS replicate as closely as possible the natural drainage of the site before development. This reduces the risk of flooding downstream that could otherwise be caused when surface water with an increased flow rate drains to a sewer of limited capacity; helps to replenish groundwater; and removes



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pollutants gathered during runoff.

Management train and treatment stages

E.6.11 Different types of sustainable drainage components should be used in series throughout a development site in order to most effectively achieve the indented benefits of having SuDS. The figure below illustrates the hierarchy of use, known as the SuDS management train that should be followed when planning the drainage strategy.

1. Good Housekeeping

Best Practice to reduce the potential for pollutants to reach the environment and reduce potential for flooding by encouraging natural runoff paths

2. Source Control

Control runoff at or adjacent to the source; permeable surfaces, filter trenches and swales

3. Site Control

Local facilities receiving runoff from upstream with a single controlled outlet; detention basins, small ponds

4. Regional Control

Larger features, collecting runoff from upstream controls. Used as landscape features for final treatment. Significant pollution should be removed by upstream features (for larger sites or strategic solutions linked to several sites).

E.6.12 There are a wide range of sustainable drainage components available each using slightly different techniques to manage water. It is likely therefore that there will be a tech-

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nique or component suitable for each site. Of note is that it is still possible to include traditional or piped methods within sustainable drainage systems. The overall design just needs to ensure that the different components do work well together to achieve the end aims of sustainable drainage.

E.6.13 Table 5 of the Technical Guide to the NPPF provides information on recommended peak rainfall intensities for use when taking climate change into account within the design of the development. The Council expects a sensitivity range of thirty percent (30%) to be used for rainfall intensity when designing residential developments. For commercial developments twenty percent (20%) can be used.

E.6.14 The culverting of watercourses is not generally supported by the Council. Culverting removes floodplain

storage from a watercourse and can increase the risk of flooding upstream when bottlenecks or blockages occur. The need for improved green infrastructure corridors and the requirement for water environments to be improved under the Water Framework Directive are two other drivers for ensuring a natural environment around channels, ditches and rhynes. Any loss of access to the watercourse can also be a serious problem for the Council, Environment Agency, Internal Drainage Board and riparian owners who need to maintain the watercourse.

E.7 SUSTAINABILITY / ENERGY / CONSTRUCTION / WASTE

E.7.1 The NPPF states that Planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon ener-

gy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development. (para. 93).

E.7.2 Sustainable development is central to land use planning. Policies CC1 and NH10 of the Local Plan promote low carbon and high quality development that meets the needs of the present without compromising the ability of future generations to meet their own needs.

E.7.3 Delivering more sustainable forms of development and effectively tackling the causes of climate change in the way that we plan for new development requires new thinking and an innovative approach, especially as the District grows and the costs of heating and powering homes and business increases. This section of the SPD is to assist those involved in the planning, design and construction of new development within West

Somerset.

E.7.4 Climate change is a challenge for us all and we need to act now. There are a growing number of pressures, for example, energy prices, the potential for waste disposal through landfill is decreasing and waste disposal costs are rising. Water supply, water consumption and flooding are all current issues.

E.7.5 Sustainable design and construction not only has benefits in terms of mitigating climate change, constructing buildings that are energy efficient and or supplied by low or zero carbon technologies can:

- improve the energy security of the development
- reduce fuel poverty for householders which is caused by a combination of poor energy efficiency in homes, low incomes and high energy prices

E.7.6 The use of the sustaina-

ble design and construction actions set out in this section of this SPD will ensure that development in West Somerset adapts and mitigate climate change through a range of measures such as:

- high standards of thermal performance and energy efficiency; and
- high standards of water efficiency incorporating sustainable drainage measures (as set out in E.6);

E.7.7 In order to face up to these challenges and deliver national planning objectives through the local planning system as well as the Councils aspirations for sustainable communities and buildings, this SPD sets minimum standards for new build residential and non-residential developments in the District.

Constraints and viability

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E.7.8 The Council acknowledges that in certain circumstances the actions set out in this section of the SPD may not be achievable and will be open to negotiations if a developer considers that one of the following factors applies to their development:

- site constraints
- financial viability
- technical viability

E.7.9 In instances where the Council agrees that one or more of the actions set out in this section of this SPD will not be achievable through discussions during pre-application advice, the Council will provide written confirmation of the approach and whether any alternative standards will be considered. An example would be the Council agreeing for a development not to provide any low or zero carbon technologies on site where they demonstrate the development site is unsuitable for such technologies.



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Sustainable Design within Development

E.7.10 Sustainable design and construction requires new buildings and places to be designed to reduce their environmental impact and effectively mitigate and adapt to climate change. Sustainability and climate change should be considered in all development. The following four key issues are of importance:

- Environmental impacts: Impacts may include unnecessary carbon emissions from a development, or impacts on health as a result of development;
- Resource Efficiency: Making the best use of natural resources such as energy, water and waste;
- Mitigation: To mitigate the effects of climate change, buildings should aim to reduce their greenhouse gas emissions that contribute to the effects of climate change. Carbon dioxide is one of the key greenhouse gas emissions.

- Adaption: Buildings and places should be designed following climate adaption principles reflecting the predicted effects of climate change such as high temperature, flood risk and ground conditions.

E.7.11 There are two industry leading assessment ratings that can be used to determine the sustainability of a development's design and construction. For new build residential the Code for Sustainable Homes is a key national standard for key elements of design and construction, and for non-residential development BREEAM standards can assess the environmental performance of buildings.

The Code for Sustainable Homes

E.7.12 The Code for Sustainable Homes is a voluntary standard designed to improve the overall sustainability of new homes

by setting a single framework within which the home building industry can design and construct homes to higher environmental standards. Whilst the Code is currently a voluntary standard for private housing development, since April 2008 all publically funded homes have had to meet Code Level 3.

E.7.13 The Code measures the sustainability of a home against nine design categories rating the whole home as a complete package. A Code level is awarded on the basis of achieving both a set of mandatory minimum standards and minimum overall score. For most of the issues within the Code assessment, developers and designers can choose standards to suit a given site and development.

E.7.14 The Code uses a sustainability rating system—indicated by stars, to communicate the overall sustainability perfor-

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mance of a home. One star is the entry level and six stars is the highest level—reflecting exemplary development in sustainability terms.

E.7.15 In light of the Councils Local Plan policies, National Guidance we will require all new residential dwellings in the District to achieve at least a Code for Sustainable Homes Level 3. However, we recognise that there are alternative sustainable design assessments that applicants may wish to use which as PassiveHaus or BREEAM for communities. If an applicant wishes to use an alternative to the Code for Sustainable Homes this will need to be agreed in writing by the Council.

The Council will require residential developments of 1 or more gross units to achieve as a **minimum Code for Sustainable Homes Level 3**

BREEAM Assessments

E.7.16 Building Research Establishment Environmental Assessment Method (BREEAM) provides assessments for a range of non-residential development types including offices, schools, industrial and retail units. Environmental performance is assessed by trained assessors against a range of categories. The categories are set out below:

- Management
- Health and Wellbeing
- Energy
- Transport
- Water
- Materials
- Waste
- Land Use and Ecology
- Pollution
- Innovation

E.7.17 Environmental performance is assessed by trained assessors against a range of categories which are set out below:

BREEAM Rating	% Score
Unclassified	<30
Pass	more than 30
Good	more than 45
Very Good	more than 55
Excellent	more than 70
Outstanding	more than 85

E.7.18 Points are scored against each of the categories and the result is an environmental rating of the proposal in the range of pass, good, very good, excellent or outstanding. The certificate awarded will form essential evidence to prove that planning conditions have been met.

E.7.19 A BREEAM assessment can be carried out at the above stages for the following types of building projects:

- Whole new buildings
- Major refurbishments of existing buildings
- New build extensions to existing buildings
- A combination of new-

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build and existing building refurbishment

- New build or refurbishment which are part of a larger mixed use building

The Council will require non-residential developments of 1000 sqm or more (net) floor-space to achieve a BREEAM Very Good rating as a minimum.

On Site low and Zero Carbon technologies

E.7.20 The Code for Sustainable Homes and BREEAM Assessments provide credits for energy and CO2 efficiencies. The Council considers that new commercial and residential developments should be designed to provide reductions in carbon emissions through the installation of on-site low or zero carbon technologies.

E.7.21 There are a range of technologies available to deliv-

er these requirements including: solar thermal panels, photovoltaic cells, small wind power generators, biomass heating and hot water systems, ground source and air sources heat pumps, micro combined heat and power systems (powered by a renewable fuel source) or energy efficient ventilation systems.

E.7.22 The Council will require detailed information on the type (s) of low and zero carbon technologies being used as part of the development.

Residential development of 1 or more (gross) units shall achieve a 10% reduction in carbon emissions through the use of on site low and zero carbon technologies

Non residential developments of 1,000 sqm or more (gross) floor-space shall achieve a 10% reduction in carbon emissions through the use of on site low and zero carbon technologies









G.1 PRE-APPLICATION ADVICE / PLANNING PERFORMANCE AGREEMENTS

G.1.1 The Council strongly encourages potential developers to engage with the Council prior to the submission of a planning application. The Council has adopted a formal approach to providing pre-application advice following the introduction of charging for providing such advice in April 2013. The charging scheme, a guidance leaflet and application form can be found on the Council's website.

G.1.2 The Council provides advice to those considering development schemes so that their application is more likely to be acceptable and a quality scheme is delivered. The Council would expect this SPD and the guidance contained therein to be taken into account and to form the basis for discussions with officers as part of the pre-application process. The Council recom-

mends that advice is sought as early as possible in the development process.

G.1.3 When an application is submitted the types of proposal which this SPD seeks to guide will normally require the submission of a Design and Access Statement. This National Validation Requirement will be needed before an application is submitted. The Council strongly urges developers to use the relevant sections within this SPD to demonstrate how they have taken account of this SPD as a material planning consideration.

G.1.4 For larger development proposals which often require an Environmental Impact Assessment the Council will ask a developer to enter into a Planning Performance Agreement that will enable the Council to recover the costs of procuring specialist assistance to help deliver the best possible advice

as well as covering the cost of Council officers work on the project. The pre-application advice charging scheme has been designed to enable scheme promoters to seek the advice of officers in an easy and accessible way once a formal written response has been provided. This will, the Council hopes, enable developers to work in a positive and proactive way throughout the design process to help shape the solution.

G.1.5 The Council firmly believes that pre-application advice can be very helpful and, along with this SPD, seeks to deliver speed and certainty. Our charging scheme is designed to reflect both the scale of the development proposals and the type of advice sought so that the Council tailors its service to meet prospective developers needs.

G.2 CONSULTATION AND ENGAGEMENT

G.2.1 In the same way that the Council considers pre-application advice an important element of delivering good quality schemes, good consultation and proactive engagement with those who may be affected and who will be stakeholders during the formal planning decision making process also need to be involved as schemes develop.

G.2.2 The Council requires, in accordance with its adopted Statement of Community Involvement and its adopted Local Validation Checklist, that planning applications are accompanied by a Community Involvement Statement for all proposals involving 10 or more dwellings. A statement may also be requested for any other development on a site measuring 0.5Ha or more.

G.2.3 The Council will expect a



Community Involvement Statement to set out how and when the local community were consulted on a development scheme and importantly how views expressed by the community during the process have positively influenced the development which has ultimately be submitted.

G.2.4 There are clearly a range of methods of consulting and engaging with the community to seek their views. The Council has previously set out what it will do during the production of its own Development Plan documents in its adopted Statement of Community Consultation. The Statement of Community Involvement also sets out what the Council expects of developers when they work with the community to understand their views prior to the finalisation of a planning submission. The list presented within the Statement of Community Involvement was produced in 2007 and was not

intended to be exhaustive. Given the more up to date categorisation of development set out in the Councils pre-application the table below seeks to provide an up-to-date list of suggested elements of what might make up a successful consultation and engagement process.

G.2.5 As well as involving the local community it will be important for scheme promoters to take account of the views of statutory consultees and local stakeholders including local Ward Members and Town and Parish Councils.

G.2.6 It will be important for developers to demonstrate how they have taken on board the needs of equalities groups when designing and running their consultation and engagement process.

		Type of Development		
		Type 1 Major Development 10-24 dwellings / 1000-1999m ² of commercial use / sites more than 2.5Ha but less than 5Ha	Type 2 Major Development 25-199 dwellings / more than 2000m ² of commercial use / sites more than 5Ha but less than 7.5Ha	Type 3 Major Developments 200 dwellings or more / EIA development / Sites more than 10Ha
Method of Consultation	Public Meetings	✓	✓	✓
	Public Exhibition	✓	✓	✓
	Website	✓	✓	✓
	Town / Parish Council	✓	✓	✓
	Media Activity		✓	✓
	Design Review Panel		✓	✓
	Planning for Real		✓	✓
	Briefing for Planning Committee		✓	✓
	Workshops			✓
	Planning Aid			✓
	Development Brief			✓



G.3 APPROACH TO AN APPLICATION

G.3.1 The Council has set out in its adopted Local Validation Checklist, which is available on its website, the different types of plans, information, statements and forms which are needed to make up a planning application. This SPD is designed to set out what the Council would expect to see in a Design and Access Statement and ultimately the design solution being proposed as shown on the plans.

G.3.2 Scheme promoters who have used and taken on board the advice of the Council as part of the pre-application service can expect the Council to continue to liaise and work with them prior to the determination of an application once it has been submitted.

G.3.3 Those who submit an application without first seeking the advice of the Council will be advised on the progress of an

application during its consideration however, where issues are identified which mean significant changes are required it is likely that the Council will seek for the application to be withdrawn.

G.4 MASTERPLANNING AND DESIGN CODES

G.4.1 The Council agrees with Government research that Masterplans and Design Codes can play an effective part in building sustainable communities for future generations and are particularly valuable when sites are large, when they are in multiple ownership or when a development involves several developers or design teams. The main benefits of design codes outlined in 'Design Coding in Practice: An Evaluation' are that:

- Design Codes can play a major role in delivering better quality development;
- They have a significant role

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to play in delivering a more certain design and development process;

- If properly managed, can provide the focus around which terms of professional stakeholders can integrate their activities, delivering the process of a more coordinated and consensus driven process;
- Provide enhanced economic value that better design and a strong sense of place can be delivered.

G.4.2 The Council would expect scheme promoters to prepare a Masterplan and a Design Code on the largest sites set out in the Local Plan (see section F) or where larger sites are in multiple occupation or where a sensitive site involves several developers and/or design teams.

G.4.3 Design Codes are a distinct form of detailed guidance that prescribes the three dimensional components of a

development and how these relate to one another but do not prescribe the overall outcome. A code is therefore a set out specific components with rules to guide their physical use in order to generate the physical development of a site or place. The aim of design coding is therefore to provide clarity over what constitutes acceptable design quality and thereby achieve a level of certainty for developers and the local community alike.

G.4.4 Design Codes usually build upon the design vision contained in a Masterplan or development brief and provide a set of requirements (the codes themselves) to achieve the vision. These can extend from urban design principles aimed at delivering better quality places, and include requirements for streets, blocks, massing and so on and can also be focussed on building architecture and sustainable energy solutions on a development wide basis.

A Design Code is an illustrated compendium of the necessary and optional design components of a particular development with instructions and advice about how these relate together in order to deliver a Masterplan or other site-based vision.
Design Coding in Practice

G.4.5 The Council would expect to secure the delivery of a Design Code as part of an outline planning consent with the approval of the Code by the Council prior to the determination of Reserved Matters applications.

G.4.6 The Council would expect to see a Design Code set out the description of Character Areas, the location of Landmark and Secondary Accent or Marker Buildings, the approach to Tenure Distribution and a Regulating Code setting out the following:

- Street Types
- Appropriate Typologies / Dwelling Footprints

- Storey Heights
- Building Setbacks
- Requirements for breaks or continuity in building form
- Requirements for continuity of building line
- Parking Solutions
- Density Framework
- Key Buildings and Groupings

G.5 LEGAL AGREEMENTS

G.5.1 The Councils approach to legal agreements under Section 106 of the Town and Country Planning Act is set out in its Supplementary Planning Document on Planning Obligations. The NPPF sets out at Paragraph 204 that Planning Obligations should only be sought where they meet all of the following tests:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably relat-

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ed in scale and kind to the development.

G.5.2 The Local Validation Checklist sets out that the Council requires that applications are accompanied with either Planning Obligations or Draft Heads of Terms where the Planning Obligations SPD indicates that a legal agreement is required.

G.5.3 The Council would strongly encourage potential applicants to use the pre-application advice service described under Section G.1 where discussions about the content of a legal agreement would be one element of the advice provided.

G.5.4 For larger developments the content of a legal agreement will be influenced by the issues set out in Section E—Creating Sustainable Communities. Where facilities are provided on site the legal agree-

ment would be expected to cover the long term management and maintenance of facilities.

G.5.5 Where it is not possible to provide facilities on site a legal agreement will be required providing contributions towards the delivery / improvement of facilities.

G.6 IMPLEMENTATION / PHASING

G.6.1 The Council would expect facilities to be provided on site as part of a comprehensive development and a combination of a Masterplan / Design Code and a legal agreement will be necessary to ensure the appropriate phasing and implementation of community related facilities and any off site improvements / contributions as maybe required.





