

Summary of responses made under Regulation 20 to the formal publication of the West Somerset Local Plan to 2032 with West Somerset Council comments and minor changes.



July 2015

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Ref. No.	Name of Representor	Policy / matter	Summary of representation	Soundness test cited	Suggested change	WSC comment	Proposed change.
1/1	Natural England	NH3	The revised version of the second bullet point in policy NH3 agreed between Natural England, and the Somerset County Ecologist through the Habitat Regulations Assessment process, necessary for the Plan to be sound in this respect, reads as follows: "MEASURES WILL BE TAKEN TO PROTECT OR MITIGATE TO ACCEPTABLE LEVELS (OR, AS A LAST RESORT, PROPORTIONATELY COMPENSATE FOR) ADVERSE IMPACTS ON BIODIVERSITY. MEASURES SHALL ENSURE A NET GAIN IN BIODIVERSITY WHERE POSSIBLE. THE SOMERSET 'HABITAT EVALUATION PROCEDURE' WILL BE USED IN CALCULATING THE VALUE OF A SITE TO SPECIES AFFECTED BY A PROPOSAL AS APPROPRIATE--WHERE THE CONSERVATION VALUE OF THE HABITAT IS <u>REPLACABLE</u> TO BE REPLACED MITIGATION TECHNIQUES NEED TO BE PROVEN;"	Not effective.	The second bullet point in the policy should be amended so that the last sentence reads: "WHERE HABITAT IS REPLACABLE MITIGATION TECHNIQUES NEED TO BE PROVEN;"	The second bullet point in the policy should be amended to read as per Natural England's representation.	the last sentence of the second bullet point in the policy to be amended to read: "WHERE HABITAT IS REPLACABLE MITIGATION TECHNIQUES NEED TO BE PROVEN;"
2/1	Historic England (formerly English Heritage).	EN2	Some level of harm is considered to be acceptable under the policy, Para 132 of the NPPF states that any harm or loss should require clear and convincing justification.	Not consistent with national policy	Amend to read: <i>"The impacts on the historic environment are not harmed and can be mitigated."</i>	The concern expressed can be addressed by an amended change to clearly indicate that impacts must be justified and can be mitigated.	Amend last part of policy to read: <i>"The impacts on the historic environment are justifiable and can be mitigated."</i>
2/2	Historic England (formerly English Heritage).	MD1	Bullet point 2 assumes a level of harm as a starting point, this is not in accordance with the NPPF or the principles of sustainable development. The historic environment is significant contributor to Minehead as a tourist destination. As tourism is the main economic driver the council should wish to build upon and enhance the town as an asset.	The policy is not effective or consistent with national policy.	Amend the second bullet point to read: <i>"Preserve and enhance the historic environment of the urban area."</i>	The issue relates to the level of detail appropriate to the strategic policies of the plan. The detailed consideration of design of development schemes would include mitigation measures to safeguard heritage assets. It is essential to read the plan as a whole.	No change
2/3	Historic England (formerly English Heritage).	MD2	The Heritage Assets Evidence Base Identifies "Magnitude of impact and significance of effects" to a number of assets on the Hopcott Road. While this may be less than substantial harm, this is still harm. We advise the need for the policy and future masterplan to appropriately consider the impacts upon the historic environment. This will provide a strategy for the historic environment. These issues could also be addressed through the Green Infrastructure Policy.	Unsound	Amend to add an additional bullet point: <i>"Measures to prevent harm to the significance of historic assets on the late 19th/early 20th century villas on Hopcott/Periton Road ; Lower Hopcott; Periton & Periton Cottages: Grade II listed buildings and Higher Hopcott Farm"</i>	The issue relates to the level of detail appropriate to the strategic policies of the plan. The detailed consideration of design of the Key Strategic sites for instance would take place through the masterplanning process which would include mitigation measures to safeguard heritage assets. It is essential to read the plan as a whole.	No change
2/4	Historic England (formerly English Heritage).	WA1	There is no reference to the historic environment in either the policy or text. Watchet is significant in terms of its historic environment and the Issues Paper recognises this. The evidence base appears not to have been adequately used as part of the process to actually determine the appropriateness of potential development.	The policy is not positively prepared, justified, effective or consistent with national policy	Amend the second bullet point to read: <i>"Maintain and enhance the attractiveness of the historic character and heritage assets as a tourist destination, including the operation of the marina"</i>	The issue relates to the level of detail appropriate to the strategic policies of the plan. The detailed consideration of design of development schemes would include mitigation measures to safeguard heritage assets. It is essential to read the plan as a whole.	No change
2/5	Historic England (formerly English Heritage).	WA2	The allocation of this area would destroy the rural setting of the grade 2 listed building at Parsonage Cottage, as concluded by the Heritage Asset Study: "the development impact is Major and Moderate/ Large", and that harm will result from this allocation, the plan needs to set out ways in which this harm might be mitigated. There is a requirement in the 1990 Act that "special regard" should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess. Consequently, there is a need to ensure that those elements which contribute to the significance of this building are not harmed are referred to in development guidelines. If, as a result of the mitigation, it is likely that there will still be harm to elements which contribute to the significance of this building and its setting, then the plan will need to justify this allocation in terms of NPPF Paragraphs 133 and 134. This will provide a strategy for the historic environment.	The policy is not positively prepared, justified, effective or consistent with national policy.	The justification to this allocation needs to set out the reasons (NPPF Paragraphs 133 and 134.) why this site is considered appropriate as an allocation given the fact that the Council considers that it would appear to result in harm to elements which contribute to the significance of the grade 2 listed building at Parsonage Cottage. If it is still considered appropriate to allocate this site, the development guidelines need to set out more explicitly, how the listed building and its setting might be safeguarded. A design led response could be considered to help arrive at the numbers and location of development with an indicative plan. The policy would then needs to set out ways in which this harm might be mitigated. If harm cannot be mitigated then the site should be deleted.	The issue relates to the level of detail appropriate to the strategic policies of the plan. The detailed consideration of design of the Key Strategic sites for instance would take place through the masterplanning process which would include mitigation measures to safeguard heritage assets. It is essential to read the plan as a whole.	No change

Ref. No.	Name of Representor	Policy / matter	Summary of representation	Soundness test cited	Suggested change	WSC comment	Proposed change.
2/6	Historic England (formerly English Heritage).	WI2	<p>Battlegore Cemetery Scheduled Monument.</p> <p>Given that the allocation of this area would lead to development which appears poorly related to the form and character of the town, would destroy the rural setting of most of the scheduled monument, along with views to the south and southwest, resulting in it being sandwiched between two areas of modern development; it is unsurprising that the Historic Environment Issues Paper concludes the harm is “substantial”.</p> <p>We agree with this final conclusion but it casts doubt as to whether the site can accommodate 406 dwellings along with associated infrastructure without causing harm and any mitigation may not resolve this. On what basis or site analysis was the site given a number of 406?</p> <p>Any numbers proposed should be based on response to the constraints of the scheduled monument and its setting. This work should be carried out before allocation in the local plan. A review of the evidence base does not reveal this work, in fact we can find no reference to the site in the 2010 SHLAA.</p> <p>The evidence is further called in to question within the SEA, which believes there to be uncertain effect on the SA objective 9a and that mitigation is appropriate. The impact of policy on 9a is not uncertain, there is very likely to be harm to; and archaeological field evaluation does not mitigate issues pertaining to setting. This calls the SEAs thoroughness in to doubt.</p> <p>We therefore question the sustainable credentials of this site. The historic environment seems not to have been adequately used as part of the process to actually determine the appropriateness of potential development. The evidence should identify a clear understanding of the significance of the heritage assets and their settings, necessary to develop proposals which avoid or minimise to the scheduled monuments.</p> <p>The plan needs to set out ways in which this harm might be mitigated, any reference to mitigation should be explicit and in policy not in text.</p> <p>You might also choose to address these issues through the Green Infrastructure Policy.</p> <p>If, as a result of the mitigation, it is likely that there will still be harm to elements which contribute to the significance of this building and its setting, then the plan will need to justify this allocation in term of NPPF Paragraphs 133 and 134.</p> <p>In its current form though the policy is not positively prepared to achieve the aims and objectives of the plan; neither is it justified as the most appropriate location based on the evidence; nor will it be effective in delivering the numbers of housing proposed; and ultimately fails to achieve sustainable development and so is not consistent with national policy.</p>	The policy is not positively prepared, justified, effective or consistent with national policy.	<p>Delete the site to the east of the Battlegore cemetery Scheduled Monument</p> <p>A design led response could be considered to help arrive at the numbers and location of development with an indicative plan. The policy would then needs to set out ways in which this harm might be mitigated.</p>	The issue relates to the level of detail appropriate to the strategic policies of the plan. The detailed consideration of design of development schemes would include mitigation measures to safeguard heritage assets. It is essential to read the plan as a whole.	No change
2/7	Historic England (formerly English Heritage).	LT1 (Watchet)	<p>Daws Castle and the Lime Kilns are historic assets of national importance.</p> <p>The Heritage Issues paper doesn't appear to have been used to inform the policy or seek positive outcomes for the historic environment. It states</p> <p><i>“Options for rescue excavations in advance of further coastal erosion of Daw's Castle should be considered through Section 106 agreements with developers. It is included on the Heritage at Risk list (2014) as being a monument at medium risk and considered stable (at time of listing) but its status is likely to change to high risk due to increasing coastal erosion.”</i></p> <p>The plan should be answering questions around will this development mitigate the harm and how could it address management issues so close to a site of national importance?</p>	Unsound	<p>Amend to read:</p> <p><i>“Proposals must safeguard and where appropriate enhance historic asset of Daws Castle and the lime kilns and their settings.</i></p> <p><i>The masterplan should consider the use of soft landscaping, green spaces and sympathetic design in terms of appearance to mitigate harm.</i></p> <p><i>Options for rescue:</i></p> <p><i>excavations in advance of further coastal erosion of Daw's Castle will be sought through Section 106 agreements with developers”</i></p>	The issue relates to the level of detail appropriate to the strategic policies of the plan. The detailed consideration of design of the Key Strategic sites for instance would take place through the masterplanning process which would include mitigation measures to safeguard heritage assets. It is essential to read the plan as a whole.	No change
2/8	Historic England (formerly English Heritage).	CC1	<p>The impact of Renewable and Low Carbon Energy has the potential to cause substantial harm to the historic environment, whether to the setting of conservation areas or other assets, listed buildings etc. The NPPF sets out policies in relation to the protection and conservation of the historic environment and its significance and is clear (para. 97) that in promoting the use of low carbon energy and renewable energy a local authority should design their policies to ensure that the adverse impacts are addressed satisfactorily, including cumulative and visual impacts making clear the criteria used to achieve this.</p> <p>The Plan and SEA do not appear to consider the impacts upon the historic environment at page 31 CC1. The policy lacks any mention that the benefits of renewable energy sources should be appropriately balanced against harm and impact on the historic and natural environment. It should be made clear that applicants are expected to fully understanding the heritage significance and context of the surrounding areas and the impact a scheme will have on the wider setting and surroundings.</p>	Unsound	<p>Add points to read:</p> <p><i>“Proposals must safeguard and where appropriate enhance historic assets and their settings.”</i></p> <p>The preamble in the text should explain why there is a need for this consideration by applicants.</p>	The issue relates to the level of detail appropriate to the strategic policies of the plan. It is essential to read the plan as a whole.	No change

Ref. No.	Name of Representor	Policy / matter	Summary of representation	Soundness test cited	Suggested change	WSC comment	Proposed change.
2/9	Historic England (formerly English Heritage).	NH1	<p>While we appreciate that there will be DM policies in the future DPDs, the strategic policy in this form is not a strategy for the historic environment and is not sound. A positive strategy for the historic environment is more than this one policy, it should be embedded in the plan, in all the relevant or appropriate policies where the historic environment is impacted or where it can be used as a catalyst for positive change.¹</p> <p>Policy NH1 should be clear that proposals should conserve and enhance the historic environment, both designated and undesignated (for example buildings on local lists, or sites that have the potential for archaeology.)</p> <p>It should identify a strategy for what it will do for those heritage assets at risk.² In your justification for the policy bullet points highlight a number of assets of note, this policy could usefully highlight those assets at risk and outline your strategy for getting them off the Register.</p> <p>Change is proposed, for example, in Watchet and Minehead and a detailed response could be outlined in those relevant policies in the plan in order to provide a clear indication of how the local authority will respond to development.³ This will provide certainty to a developer. This should be a strategic priority.⁴ Within these and other villages the Council's approach to managing change in the conservation areas should be based on the use of character appraisals and management plans as management tools.</p> <p>The plan should be clear that proposals for development should understand the significance of the asset.⁵ An appropriate evidence base⁶ such as urban and rural characterisation assessments should be used.</p> <p>Good design in the public realm has the opportunity to mitigate the significant adverse impacts on the historic environment and can be key in helping to achieve sustainable development but in its current wording the policy is a missing an opportunity.</p> <p>We therefore propose a number of changes which in conjunction with Policies NH1A and B will provide a sound local plan and hooks for the second part (DM Policies).</p>	Unsound	<p>Amend the policy to read:</p> <ol style="list-style-type: none"> Proposals and initiatives will be supported where the historic environment and heritage assets and their settings are conserved and/or enhanced in line with their interest and significance. Planning decisions will have regard to the contribution heritage assets can have to the delivery of wider social, cultural, economic and environmental objectives. Elements of the historic environment which contribute towards the unique identity of areas and help create a sense of place will be conserved and, where possible, enhanced, with further detail set out in part 2 Local Plans. Elements of particular importance include: <ul style="list-style-type: none"> a) Registered Parks and Gardens, St Audries/West Quantoxhead landscape park, Fairfield House deer park and Crowcombe Court Park, and b) important historic landscape features such as the impressive upstanding medieval remains including Cleeve Abbey and Stogursey Castle, or the Bronze Age barrow cemetery at Battlegore in Williton and the Iron Age hillfort of Trendle Ring and c) historic features within the anglo-saxon town of Watchet with its Tudor port; and d) Minehead, with its Tudor port and as a Victorian resort. A variety of approaches will be used to assist in the protection and enjoyment of the historic environment including: <ul style="list-style-type: none"> a) the use of appraisals and management plans of existing and potential Conservation Areas; b) taking opportunities for removing assets from the at risk register; c) considering the use of Article 4 directions; d) working with partners, owners and developers to identify ways to positively manage and make better use of historic assets; e) considering improvements to the public realm and the setting of heritage assets within it; f) ensuring that information about the significance of the historic environment is publicly available; g) where there is a loss in whole or in part to the significance of an identified historic asset then evidence should be recorded of its importance; and h) considering the need for the preparation of local evidence or plans. Particular attention will be given to heritage assets at risk of harm or loss of significance, or where a number of heritage assets have significance as a group or give context to a wider area. 	The issue relates to the level of detail appropriate to the strategic policies of the plan. The recommended policy is appropriate to a development management policy document. It is essential to read the plan as a whole.	No change
2/10	Historic England (formerly English Heritage).	NH1A	The policy is supported	Sound	None	Noted.	No Change
2/11	Historic England (formerly English Heritage).	NH1B	The policy is supported	Sound	None	Noted.	No Change

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2/12	Historic England (formerly English Heritage).	NH4	Many heritage assets form part of either the Green Infrastructure network (such as Historic Parks and Gardens) or the Green Infrastructure contributes to their setting. There should be a requirement that green infrastructure protects and enhances the heritage assets of the Borough. It can be an opportunity to mitigate development that might otherwise harm historic assets. There are a number of examples in this plan, two such possible examples of this might be the Grade 2 listed building at Parsons cottage on site WA2 in Watchet or policy MD2.	Unsound	That green infrastructure "to help protect and enhance the heritage assets." Alternatively the policy could be clear about where it should be applied on specific sites.	The issue relates to the level of detail appropriate to the strategic policies of the plan. The recommended amendment is appropriate to a development management policy document. It is essential to read the plan as a whole.	
3/1	Environment Agency	General	The Local Plan's policies and allocations provide a low degree of chance for future flood risk as all Key Strategic Site allocations are within Flood Zone 1, which accords with NPPF sequential test principles evidenced by the Exmoor and WSDC level 1 Strategic Flood Risk Assessment.	None stated	None.	Noted.	No change
3/2	Environment Agency	Section 4.8	The policy is supported, as is the aspiration that managing flood risks in main settlements is a critical issue for the Plan. The EA seeks to lead or partner with developers and other risk management authorities, to identify and deliver appropriate flood risk reduction projects across the District.	None stated	None.	Noted.	No change
3/3	Environment Agency	Section 6.1	The policy is supported with flood risk in Minehead, Watchet and Williton being noted as a key issue, however the plan is rather vague as to what is actually required in terms of infrastructure or how much it might cost.	None stated	None.	Noted.	No change
3/4	Environment Agency	MD1, MD2, WA1, WA2, WI1 and WI2.	The policies mention flood risk reduction objectives, the EA supports these in principle but would require to view the details of any physical requirements. Justification sources could include the SFRA documents.	None stated	None.	Noted.	No change
3/5	Environment Agency	WI1 and WI2	The policy could be strengthened to be more definite about requiring contributions towards a comprehensive flood alleviation scheme for Williton. The IDP fails to mention flood alleviation works for Williton.	None stated	Strengthen policy to be more definite about requiring contributions towards a comprehensive flood alleviation scheme for Williton.	All the Key Strategic Site allocations are within zone 1 flood risk areas, where all that can be required is to attenuate the run off of surface water from the development.	No change
3/6	Environment Agency	CC2	The policy is supported	Sound.	None.	Noted.	No change
3/7	Environment Agency	CC3	The policy is supported subject to an amendment. It is considered that the policy is too restrictive, it should also allow for flood risk management infrastructure, habitat creation projects etc. In addition, some allowance should be made for the future revision of the CCMA boundaries in the light of future improved technical evidence supporting such changes. The Draft CCMA policy for Porlock Weir in the Exmoor National Park Authority's Draft Local Plan is put forward as an example to follow as set out below: <u>CC-S3 PORLOCK WEIR COASTAL CHANGE MANAGEMENT AREA</u> 1. A Coastal Change Management Area (CCMA) is designated at Porlock Weir as shown on the Proposals Map. 2. Within the Porlock Weir CCMA: a) Permanent new residential development will not be permitted. b) Change of use will be permitted for less vulnerable and water compatible tourism-related development, shops, small scale business or leisure activities requiring a coastal location and providing substantial economic and social benefits to the community. c) Key community infrastructure will be permitted, which has to be sited within the CCMA to provide the intended benefits to the wider community and there are clear, costed plans to manage the impact of coastal change on it and the service it provides. d) Adaptation measures to existing buildings and businesses, which increase resilience to flood risk will be supported. 3. Any development permitted under (2) above will be subject to time-limited planning permissions. 4. Replacement of buildings and facilities likely to be lost as a result of coastal change will be permitted in accordance with Policy CC-S4 Replacement Dwellings from CCMA's. 5. A strategy for Porlock Weir and surrounding area will be produced in line with the principles in (2) above and CC-S4 Replacement Dwellings from CCMA's. Any proposals for adaptation and relocation at Porlock Weir will be required to be achieved in accordance with this strategy.	None stated	Amend the policy to be consistent with the approach set out in the CC-S3 Porlock Weir policy attached to the Agency's representations.	The policy does not preclude the types of development mentioned in the representation: flood risk management infrastructure, habitat creation projects etc. The extent of CCMA's would be subject to change on review as is everything in the Local Plan. The issue of threat from erosion to existing dwellings in the Local Plan area is significantly different from that existing at Porlock Weir and does not justify a clause permitting automatic replacement.	No change
3/8	Environment Agency	WA1	It would provide additional clarity if the policy area were to be shown on the Proposals Map.	None stated	Add policy area WA1 to the Proposals Map amendments.	The policy applies to the Watchet built up area and its immediate surroundings. The Plan does not use residential development boundaries.	No change.
3/9	Environment Agency	CC6	The policy wording should be amended in order to connect it more directly to the Agency's practice guidance and standards.	None stated	The policy should be amended to read as follows: Development that would have an adverse impact on: - The availability, quality and use of existing water resources; - The existing water table level. - Accessibility to existing water courses for maintenance and, - Areas at cumulative risk of flooding by tidal, fluvial and /or surface water run-off will only be permitted in accordance with the policies set out in the Environment Agency's Groundwater Protection: Policy & practice (GP3) and if adequate and environmentally acceptable measures are incorporated that provide suitable protection and mitigation both on-site and through displacement to adjoining land.	The changes proposed involve a level of detail more appropriate to detailed development management policy.	No change

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3/10	Environment Agency	NH6	The policy wording should be amended in order to connect it more directly to the Agency's practice guidance and standards.	None stated	The policy should be amended to read as follows: All development proposals on or in proximity to land known to be, or which may be, contaminated will include measures designed to prevent an unacceptable risk to public health and the environment. In order to protect water quality and resources any such proposals will only be permitted in accordance with the policies set out in the Environment Agency's Groundwater Protection: Policy and practice (GP3). - Development proposals will not be permitted on or in proximity to land known to be, or which may be, unstable.	The changes proposed involve a level of detail more appropriate to detailed development management policy.	No change.
3/11	Environment Agency	EN2	The policy doesn't refer specifically to emerging unconventional oil and gas development. Does the Local Authority have any policies relating to the location of such developments?	None stated	None.	Not specifically covered but larger scale schemes would be considered under EN2	No change.
3/12	Environment Agency	MD1	The policy appears to ignore the landscape and wildlife value of Dunster Marsh.	None stated	None.	The scope of the policy relates to the built up area of Minehead / Alcombe and their immediate environs, and as such does not include Dunster Marsh.	No change.
3/13	Environment Agency	WA1	Watchet environmental considerations include an area in the valley bottom in the vicinity of the paper mill which is at high risk of flooding. Sequential and exceptions tests apply here with compensational flood storage possibly being required.	None stated	None.	Noted, in the event of development being proposed in that area, the issue would be addressed via policy CC2	No change.
3/14	Environment Agency	WI2	The area allocated to the west of the Village has ditches and leats known to have been used by otters. If the site is to be used for development, preliminary ecological work will be necessary to assess the importance of the site for otters and otter movement.	None stated	A requirement for ecological assessment in relation to otters in advance of development should be included	The proposed Key Strategic Site is not in the area of former water meadows. Otter issues would be addressed through the masterplanning process.	No change.
3/15	Environment Agency	CF1	Informal recreation / amenity/ education uses can often be developed on areas used to accommodate flood water, eg sustainable urban drainage schemes if they are properly planned for multifunctional use. Flood events in steep catchments are likely to be of short duration.	None stated	None.	Noted.	No change.
3/16	Environment Agency	CC1	Small scale hydro schemes must not compromise fish movement especially by key migratory species such as salmon, sea trout, eel and river lamprey.	None stated	None.	These issues would be addressed through the development management process.	No change.
3/17	Environment Agency	CC6	Development should be set back from watercourses not only for maintenance access but also to safeguard the biodiversity of riparian habitats and provide linear recreational space.	None stated	None.	This is a matter more appropriate to development management policy.	No change.
3/18	Environment Agency	NH3	River and stream corridors including riparian margins are a natural habitat which often retains continuity, providing links between discontinuous areas of woodland for instance. Development which interrupts this continuity should be revised.	None stated	None.	This is a matter more appropriate to development management policy.	No change.
3/19	Environment Agency	NH4	Stream and river corridors should be specifically mentioned in the policy as a key example of green infrastructure.	None stated	Stream and river corridors should be specifically mentioned in the policy as a key example of green infrastructure.	The policy is strategic in nature, it is suggested that the reference would be more appropriately added to the policy's justification.	Add to the end of the first bullet of the justification: <i>"Stream and river corridors are a key example of green infrastructure."</i>
3/20	Environment Agency	CC5	The policy is supported.	The policy is sound.	None.	Noted.	No change.
3/21	Environment Agency	Habitat Regulations Assessment	A number of specific comments were made on the content of the Habitat Regulations Assessment.	None stated	None.	The Habitat Regulations Assessment is a technical document which is not subject to representations as part of this exercise.	
4/1	Marine Management Organisation	N/a	Makes no specific comments.	None stated	None.	Noted.	No change.
5/1	Exmoor National Park Authority	SC2	The Plan's provision for 2,900 dwellings is welcomed, however, this is considered sufficient to provide for the whole open market housing requirement for the West Somerset Housing Authority Area including that part within the Park. The 3 rd bullet of the justification for SC2 should be amended to reflect this. The National Park element of this open market requirement would be a maximum of 233 dwellings.	None stated	The 3 rd bullet of the justification for SC2 should be amended to indicate that the Plan will provide for some 233 open market dwellings the need for which arises in the National Park part of West Somerset.	The Plan's soundness would be significantly undermined by an acknowledgement that this requirement, displaced from a neighbouring LPA area, could be provided for within the Plan's existing housing requirement.	No change.
5/2	Exmoor National Park Authority	MD1	The changes to the policy's 5 th bullet and the corresponding changes to the justification are supported. It is suggested however that the reference to the National Park lying 'some distance' beyond the fringes of the town in the justification is not accurate. Alternative wording is suggested.	None stated	The first sentence of the 7 th bullet of the policy's justification should be amended as follows: "Minehead lies relatively close to the designated area of the Exmoor National Park which lies some distance beyond the southern and western fringes of the town."	The revised wording suggested is noted.	No change.
5/3	Exmoor National Park Authority	MD2	The change to the policy's 5 th bullet ensuring an appropriate design response to the site's proximity to the National Park is supported. The requirement for a master plan to assist with the development of the site is welcomed, the National Park Authority wishes to be consulted on its preparation. The justification references in bullets 7 and 8 regarding the treatment of the National Park and its dark skies are also welcomed.	None stated	No change proposed	Noted.	No change.

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5/4	Exmoor National Park Authority	LT1	The National Park Authority welcomes the 3 rd and 4 th bullet points, requiring master plans providing for appropriate design responses to the sites' proximity to the National Park. The National Park Authority wishes to be consulted on such master plans. Justification bullets 4 and 5 regarding the appropriate treatment of the National Park and its dark skies reserve are welcomed.	None stated	No change proposed	Noted.	No change.
5/5	Exmoor National Park Authority	SV1	The named Primary and Secondary settlements which are close to the National Park, including Carhampton, Battleton and Brushford. The justification should include the same provisions regarding the appropriate treatment of the National Park and its dark skies reserve using wording similar to the MD1 justification bullets 7 and 8.	None stated	The justification should include the same provisions regarding the appropriate treatment of the National Park and its dark skies reserve using wording similar to the MD1 justification bullets 7 and 8.	The use of policy SV1 should facilitate the application of these principles. This is essentially a matter of detailed design which will be dealt with through development management policies.	No change.
5/6	Exmoor National Park Authority	NH2	The policy is supported, the first bullet point of the justification could be usefully strengthened by the inclusion of the same provisions regarding the appropriate treatment of the National Park and its dark skies reserve using wording similar to the MD1 justification bullets 7 and 8.	None stated	Add the same provisions regarding the appropriate treatment of the National Park and its dark skies reserve using wording similar to the MD1 justification bullets 7 and 8.	The use of policy SV1 should facilitate the application of these principles. This is essentially a matter of detailed design which will be dealt with through development management policies.	No change.
5/7	Exmoor National Park Authority	NH10	The policy's positive aims of sustainable design are welcomed. The Authority recommends that the Council refers to the Exmoor National Park Dark Skies reserve in the justification to encourage the use of effective and efficient lighting that reduced light pollution / spillage.	None stated	Add the same provisions regarding the appropriate treatment of the National Park and its dark skies reserve using wording similar to the MD1 justification bullets 7 and 8.	The use of policy SV1 should facilitate the application of these principles. This is essentially a matter of detailed design which will be dealt with through development management policies.	No change.
6/1	Brompton Regis Parish Council	Gen	Responded that it did not consider itself competent to judge whether the plan was legally compliant or not.	N/a	No change proposed	Noted.	No change.
7/1	Minehead Town Council	Flooding - general	Attention should be paid to development sites as a source of flooding elsewhere. Proper account has not been given to the Minehead Surface Water Management Plan in preparing the Local Plan.	Not effective	No specific change proposed, but 'further updating' is said to be urgently required.	The Minehead Surface Water Management Plan (MSWMP) was taken into account in preparing the Plan. The Council was party to its preparation.	No change.
7/2	Minehead Town Council	MD1	The general statement that development at Minehead / Alcombe must "contribute towards resolving the flood risk issues which affect the settlement including improving the sea defences protecting the eastern end of the town" is pointless unless there is something in place to indicate how this is to be achieved. The difficulties presented by the inability to pool more than 5 S106 agreements was also highlighted in relation to flood defence infrastructure in the absence of a CIL scheme for the area.	Not effective	It is suggested that more specific proposals for addressing these issues are identified in the Plan. Also that clarification of funding mechanisms for flood defence infrastructure is provided.	The Local Plan is a strategic level planning document. The level of detail referred to here is more appropriate to the negotiation of planning proposals for the implementation of the Plan.	No change.
7/3	Minehead Town Council	MD2	The reference to appropriate flood risk infrastructure being required by the policy is set against the suggestion that the Minehead Surface Water Management Plan is not part of the Plan's evidence base, and that there is a lack of specifically addressed issues relating mainly to surface water management and the allocated Key Strategic Site. The level 1 and 2 Strategic Flood Risk Assessments are said to be out of date and totally inadequate in their approach to surface water flooding. The assertion that provision of strategic development will help to minimise risk from flooding is not demonstrated. The statement in the Plan that the land is 'unconstrained by specific flooding or landscape designations' is misleading, development there would have an impact on wider flooding and landscape issues.	Not effective	Additional detail must be added as to the nature of flood risk infrastructure to be provided.	The Local Plan is a strategic level planning document. The SFRA documents prepared as part of the evidence base are appropriate to the task they have to do. The Council participated in the preparation of the MSWMP and is well aware of its content which was used to inform the preparation of the Local Plan. The MD2 site is unconstrained by specific flooding or landscape designations. There is no implied inference that it has no wider impact in relation to these matters. Such issues can be properly considered and mitigated through the masterplanning and design processes	No change.
7/4	Minehead Town Council	SC1.5	The NPPF requires that Local Plans should include policies to manage flood risk from all sources by applying its guidance. It is suggested that this has not been achieved in the Draft Local Plan.	Not effective	Add an additional sub-clause F to the section 5 of the policy: "WHERE IT DOES NOT INCREASE FLOOD RISK TO ADJOINING LAND AND EXISTING DEVELOPMENTS."	This matter is addressed through the application of policy CC2.	No change.
7/5	Minehead Town Council	LT1	Similar issues affect the Minehead part of the LT1 allocation as do the MD2 allocated Key Strategic Site. No account has been taken of the 'possible locations for attenuation features and improved sewer capacity from the options appraisal within the Minehead Surface Water Management Plan.	Not effective		The Plan has been prepared in consultation with the Environment Agency and the utility companies.	No change.
7/6	Minehead Town Council	CC2	States that the policy applies the flood risk management provisions set out in NPPF para. 100 – it does not. Particularly because the Council's Level 1 and 2 SFRAs are not adequate to evidence the management of flood risk from all sources. No advice appears to have been taken from the Local Lead Flood Authority as the SWMP has been ignored in the evidence base and no reference has been made to its surface water flood risk maps.	Not effective	The policy should be amended to read: "DEVELOPMENT PROPOSALS SHOULD BE LOCATED AND DESIGNED SO AS TO MITIGATE AGAINST AND TO AVOID INCREASED FLOOD RISK TO NEW AND EXISTING DEVELOPMENT AND LAND."	The Council participated in the preparation of the MSWMP and is well aware of its content which was used to inform the preparation of the Local Plan. Development can, in any case, include 'land'.	No change.
7/7	Minehead Town Council	CC3	There is a reference to the superseded PPS25, this should be changed to NPPF para 100.	N/a	Amend plan as requested.	The plan has already been so amended.	No change.
7/8	Minehead Town Council	CC6	The policy is not clear enough to enforce. Access standards should be defined, sewage management is not mentioned – a key aspect of water management and flood management.	Not effective	The policy should be amended by the deletion of the word 'cumulative' from the policy. Further detail is required in the policy and justification to set out how water is to be managed through the Plan.	The Plan has been prepared in consultation with the Environment Agency and the utility companies.	No change.
7/9	Minehead Town Council	EC5	The period of 12 months for marketing a business to demonstrate that it cannot be sold at a competitive price is too short in current market conditions.	Not effective	The policy should be amended by increasing 12 months to 24 months.	12 months is considered to be a reasonable amount of time for the purposes of demonstrating the saleability of a business.	No change.

Ref. No.	Name of Representor	Policy / matter	Summary of representation	Soundness test cited	Suggested change	WSC comment	Proposed change.
7/10	Minehead Town Council	Addition of Town Centre Policy.	An additional policy is required in order to safeguard the area's existing town centres.	Not effective	<p>Add and additional town centre uses policy:</p> <p>Proposals for small-scale retail, leisure and office uses will be encouraged within shopping centres where the proposed development would be of an appropriate scale to provide an essential service for the surrounding area.</p> <p>Proposals for the change of use of ground floor premises within the local shopping centres to uses other than A1, A2, A3, A4 and A5 will not be permitted.</p> <p>Proposals for change of use of ground floor A1 retail premises within the centres to other "retail" uses (A2, A3, A4 or A5) will only be permitted when there would be, either individually or cumulatively, no significant adverse impact on the character, appearance, retail function, viability and vitality of the centre, on highway safety or on the amenity of neighbouring uses.</p>	The additional EC policy protecting town centres added at the Revised Preferred Deposit stage essentially does this job. Changes have also been made to the GPDO and the GDMO which also have a bearing on these matters.	No change
7/11	Minehead Town Council	New policy needed to encourage new businesses.	A policy is needed to encourage new businesses and business expansion within the area in accordance with the NPPF. This would help to address the proportion of non-private car travel within the area, retaining more younger people within the community, and addressing the problem of low pay.	Not effective	Add suitable policy.	Planning policy is powerless to make entrepreneurs invest in an area. The Plan has as much policy encouragement for new business as is required – see policy EC1. This matter is also addressed through Economic Development activity.	No change.
7/12	Minehead Town Council	Land should be allocated for business use.	No new land is allocated for business development within the Local Plan.	Not effective	Land should be allocated for new and expanding business.	Provision has been made for each of the Key Strategic Sites to have a mixed use element of three hectares of non-residential uses which provides the opportunity for an element of employment use.	No change
7/13	Minehead Town Council	NH1	The policy should include Grade 1 and Grade 2 buildings and set out a strategy for conserving and enhancing the historic environment as required by the NPPF.	Not effective		Listed buildings are subject to separate statutory protection as such. The Historic Environment Issues Paper which forms part of the evidence base helps to ensure that the heritage is properly taken account of in exercising planning powers.	No change
7/14	Minehead Town Council	New policy for the protection of hotels.	Due to its importance as a tourist destination, there should be a policy protecting hotels from change of use similar to that included by the Exmoor National Park Authority in its Local Plan.	Not effective	A policy with a test requiring a 2 year period of demonstrable marketing at a competitive price before change of use is allowed, should be included similar to policy SC5B.	Such cases could be considered under policy EC5.	No change
7/15	Minehead Town Council	New policy to prevent hotels and large houses being converted into flats.	The creation of self-contained flats helps to meet the housing need, however their provision can be detrimental to the amenity of existing residential areas. Large concentrations of flats can lead to problems such as low levels of owner occupation and can give rise to lower standards of maintenance and environmental decline (undermining environmental and regeneration objectives). The cumulative impact of converting larger dwellings into flats can adversely affect the mix and balance of communities by reducing the proportion of family homes available.	Not effective	A policy to prevent subdivision of hotels and large houses should be added.	This is a detailed matter appropriate to development management policy. SC3 and NH10 refer at a strategic level.	No change
7/16	Minehead Town Council	SC3	Bungalows and lifetime homes should be encouraged as part of the policy.	Not effective		The use of the Lifetime Homes standard is not helpful in bringing schemes forward in West Somerset due to its inflexibility. The Plan's housing policies require a range of dwelling types and this includes bungalows. Lifetime homes principles are acknowledged in the policy SC3 purposes. In addition, the SHMA has highlighted the issue of the high proportion of the population formed by the elderly.	No change.

Ref. No.	Name of Repreentor	Policy / matter	Summary of representation	Soundness test cited	Suggested change	WSC comment	Proposed change.
7/17	Minehead Town Council	Additional design principles	A suggested statement of 12 'design principles' should be included in the Plan. These address: <ul style="list-style-type: none"> • Design of development in the context of local character • Protecting amenity • Urban design • Crime reduction and public safety • Access(including for the disabled) • Transport linkage • Parking provision • water economy, recycling • ensuring local wastewater treatment and sewerage capacity is not exceeded • incorporate sustainable urban drainage solutions in schemes • retention of existing natural features / integration of new into landscape • highway safety 	Not effective	Add new material to the plan as supplied by Minehead Town Council.	These 'design principles' are couched more in the form of development management policies. They repeat much of what is already in the Local Plan or that is standard Development Management practice.	No change.
7/18	Minehead Town Council	Additional self-build policy.	Paragraph 159 of the NPPF give Local Planning Authorities the task of addressing the needs of those who wish to build their own homes. A policy should be added to the Local Plan in order to encourage self-build as the Exmoor National Park Authority has done.	Not effective	Add appropriately worded self-build policy.	There is nothing in the Local Plan to prevent self-build projects, they are treated the same way as any other planning application for a dwelling. There is no need for such a policy which is not considered to be strategic. The Council is currently engaged in an exercise to quantify the level of demand for self-build opportunities through the preparation of a register of interests which will inform future policy development	No change.
8/1	Old Cleeve Parish Council	SC1	Some development eg: village shop, PO or business unit, should be allowed at the smaller villages such as Old Cleeve which have been treated as 'open countryside'.	Not sound	None stated.	The development of facilities which attract additional trips to small rural settlements is unsustainable and not consistent with the Plan's objectives.	No change
8/2	Old Cleeve Parish Council	CC6	Water management – robust plans are required!	Not sound	None stated.	The Plan has been prepared in consultation with the Environment Agency and the utility companies.	No change
8/3	Old Cleeve Parish Council	NH5	Protection of best and most versatile agricultural land, who makes this judgement?	Not sound	None stated.	BMV is a technical definition of agricultural land's versatility usually assessed by agricultural consultants.	No change
8/4	Old Cleeve Parish Council	NH10	The policy is welcomed, but it should not exclude small domestic applications or changes of use.	Not sound	Remove exclusion as per comment.	It would be impractical and unreasonably onerous to apply the policy to small domestic extensions. Many proposals for change of use involve no physical alterations to which a design policy could be applied.	No change
8/5	Old Cleeve Parish Council	Infrastructure Delivery Plan	Section 2, clause 2.6. The strategic development proposed will give rise to significant additional traffic on the A39 and A358 which has not been assessed. This will result in worsening environmental conditions in the settlements along these routes. Bulk goods should be carried on the West Somerset Railway rather than the roads.	Not sound	None stated.	The Council has a statutory duty to prepare a Local Plan based on its full objectively assessed housing need, and inevitably much of this housing will be provided at the main settlement of Minehead. There will be transport assessments for the major developments involved. Also, the County Highways Authority has been involved in the preparation of the Plan. Whilst the West Somerset Railway has occasionally carried freight, eg stone for coastal defence works, regular freight services linking West Somerset with the national rail network around the year are beyond the Railway's operating capacity. It is doubtful whether the way in which modern freight services operate – whole train loads of one commodity – would work for this purpose.	No change
8/6	Old Cleeve Parish Council	Waste water 2.24	Wessex Water's review is valid until 2020. The sewer from Watchet to Washford does surcharge during peak flows already.	Not sound	None stated.	Noted.	No change
9/1	Sampford Brett Parish Council	Whole Plan	The Parish Council consider the Local Plan to be both legally compliant and sound.	Sound	None.	Noted	No change.
10/1	Stogumber Parish Council	SC1	Attention is drawn to what is described as an error at the foot of page 21 in the list of primary villages with dwelling numbers at the start of the plan period. It is suggested that using the parish dwelling number rather than the Stogumber village dwelling number to calculate to maximum level of increase over the plan period is inappropriate, and would give rise to too great a level of growth in the settlement (33 as opposed to 20 additional dwellings).	Not justified, not effective.	The base dwelling numbers in the list on page 21 should be amended so that they all relate to the main settlement dwelling total within the Parish concerned.	The Strategy and housing topic paper has covered this issue. The parish dwelling number has been used as a proxy for the settlement dwelling number in this case.	No change
11/1	Stogursey Parish Council	Whole Plan	The Parish Council consider the Local Plan to be both legally compliant and sound.	Sound	None stated.	Noted.	No change
12/1	Watchet Town Council	WA1	In the supporting text box 3rd bullet: The flood risk issues are not specified. Coastal erosion is active to the west of the town between Watchet and Blue Anchor as well as at Helwell Bay which is mentioned at the bottom of page 37.	Not effective.	None stated.	The way in which the Plan is worded in this respect reflects the relatively high level nature of the document's policies. Additional detail would be provided through detailed flood risk assessment of proposed development sites.	No change
12/2	Watchet Town Council	WA2	Re flood risk management infrastructure, there is no indication of what this will involve. Sewage and drainage are crucial issues and if the system is to be upgraded, there must be some indication of what will be done in this Plan.	Not effective.	None stated.	Any such works would be identified as part of the masterplanning process for the site.	No change

Ref. No.	Name of Represantor	Policy / matter	Summary of representation	Soundness test cited	Suggested change	WSC comment	Proposed change.
13/1	Williton Parish Council	TR1 / W11	If more housing is to be provided at the village, a better road system is needed, in particular the A39 and the A358 if the Council's Corporate Priority "a thriving and increasingly varied economy where people will have the skill to work and prosper" is to be achieved.	Not positively prepared	None stated.	The potential to improve the routes of these two roads in the vicinity of Williton is heavily constrained by their physical context. Transport Assessments accompanying major applications including the Key Strategic Sites should identify and provide for any necessary highway improvements. The implementation of the Key Strategic Sites will be accompanied by necessary highway improvements which would form part of the legal agreement associated with any such planning permissions.	No change
13/2	Williton Parish Council	W12	Concern is expressed about the development site to the west of the village being separated from it by the water meadows. The water meadows need to be re-located so that the development can be sustainable.	Not positively prepared	None stated.	The water meadows are substantially identified as zone 2 or zone 3 flood risk area and also have an existing heritage and ecological value. They cannot simply be moved. A key element of the design of the Key Strategic Housing site will be the way in which it is linked through the water meadow area into the village centre.	No change
14/1	South West HARP Planning Consortium.	SC1	The arbitrary devices of maximum percentages of the existing dwelling total to limit new development, and the 50m policy are inappropriate as set out in previous representations (M6/0501-07) but should rather respond to local context as per NPPF para 58. Plan policy NH10 already includes these criteria, which are more appropriate to assess the appropriate scale of development proposals.	Not justified, not effective, not consistent with national policy.	None stated.	The mechanisms for considering appropriate scale and location of development at the settlements in which policy SC1 envisages development taking place are intended as a helpful guide to achieving successful schemes without damaging the character of existing settlements.	No change
14/2	South West HARP Planning Consortium.	SC2	The Council should consider the implications of a return to the previous household formation rates based on the 2008 household projections, which would represent a more ambitious and positive approach to housing need. It would also support the Government's aim of significantly boosting the supply of housing. To use a headship rate which reflects the recession is unduly pessimistic. The NPSHMA Update Jan 2015 gives a backlog of affordable housing delivery of 244 units.	None stated	None stated.	The Plan's housing requirement is based on a positive and up to date assessment of the objectively assessed housing need for the area. The concepts of adopting more ambitious or positive approaches to housing provision – ie: a higher level of allocation than the SHMA suggests – is only meaningful in a housing market where development pressure exists. In West Somerset there is very little pressure for development, and to over-allocate would have the unwanted effect of reducing the level of focus and control of the strategy with no additional development taking place as a result.	No change
14/3	South West HARP Planning Consortium.	SC4	The removal of 'nil-cost to registered social landlords' is supported. Concern is expressed at the blanket policy of 35% market to 65% affordable housing on exception schemes.	None stated.	None stated.	The proportion in the policy is a target to which the Council aspires in negotiation. Clearly under the NPPF, viability will always be an important consideration.	No change
14/4	South West HARP Planning Consortium.	OC1	The policy is supported. However, the wording of the policy is too restrictive to work effectively. The burden of a sequential site search should be removed. Affordable housing exception sites should be encouraged wherever they occur adjacent or in close proximity to settlements with proven affordable housing need. The requirement for a functional and financial test is neither justified nor explained, likewise the criterion that permission will initially be on a personal basis is strongly objected to, it should be removed.	Not effective	None stated.	Due to an error, the last part of the policy, beginning "Applications for dwellings...", appeared in the wrong place making it read as if this section applies to all the dwelling types mentioned in the policy. This section of the policy should follow on from "...or hunting employment," and before "or". The policy should be corrected to read as follows: <i>"Residential development in the open countryside (land not adjacent or in close proximity to the major settlements, primary and secondary villages) will only be permitted where it can be demonstrated that either:</i> <ul style="list-style-type: none"> • <i>Such a location is essential for a rural worker engaged in eg: agricultural, forestry, horticulture, equestrian or hunting employment. (Applications for such dwellings would be considered subject to a functional and financial test. Where permission is granted consideration would be given to this being initially made on a temporary basis), or;</i> • <i>it is provided through the conversion of existing, traditionally constructed buildings in association with employment or tourism purposes as part of a work / live development, or;</i> • <i>it meets an ongoing identified local need for affordable housing in the nearby settlement which cannot be met within or closer to the settlement, or;</i> • <i>it is an affordable housing exceptions scheme adjacent to, or in close proximity to, a settlement in the open countryside permitted in accordance with policy SC4(5)."</i> 	Amend policy to read as set out to the left.

Ref. No.	Name of Represorator	Policy / matter	Summary of representation	Soundness test cited	Suggested change	WSC comment	Proposed change.
14/5	South West HARP Planning Consortium.	EC6	It is unlikely that the current context would allow units meeting the terms of the policy to be viable, or meet the needs of current home working practice which tends to be focused on office accommodation. The requirement for the workspace element to be larger than the living accommodation should be removed.	Not effective	None stated.	If the suggested change were to be made, then houses could be provided through it which were indistinguishable from any other similarly sized houses with a room which could be used as an office. This is not the intention of the policy.	No change
14/6	South West HARP Planning Consortium.	Lack of old persons' housing policy.	This a critical issues for West Somerset, so it is disappointing to see no policy addressing it. Policy SC3 does not adequately address this need. An example of such a policy is attached (see below). "The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations. 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. 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"	None stated	Revised policy should be added.	Plan policy SC3 provides for a range of types and tenures of dwelling including housing for older people. This issue is also informed by the Strategic Housing Market Assessment.	No change
15/1	WYG for Summerfield Developments (SW) Ltd.	General 1	Their previous reasons for the policies identified below being unsound still stand, and should be provided to the Inspector, these representations are supplementary to and should be read together with the previous representations.	N/a	None stated.	Noted.	No change
15/2	WYG for Summerfield Developments (SW) Ltd.	General 2	The evidence base is inadequate, the Plan has been prepared on the basis of insufficient evidence, much of the evidence base has been prepared retrospectively and does not support the content of the Plan..	Not justified	None stated.	On the contrary, the Plan's evidence base is robust and consistent with the nature of the area being planned for.	No change
15/3	WYG for Summerfield Developments (SW) Ltd.	General 3	Sustainability Appraisal and the consideration of alternatives has not been properly carried out, or has been done in retrospect.	Not justified	None stated.	There has been an iterative process for the selection of development allocations informed by the evidence base. SA has been appropriately carried out.	No change
15/4	WYG for Summerfield Developments (SW) Ltd.	SC2 – rep a	Whilst the Plan's housing requirement of 2,900 is broadly supported the Plan's strategy for delivering it is not robust. The historic delivery of housing has largely relied on small sites, a concern then that only 50% of the Plan's housing is on allocated sites. The need for affordable housing suggests that more of the total be allocated.	Not effective	A greater proportion of the Plan's requirement should be allocated.	The allocation of a significant proportion, but not all of the housing provision in the Plan allows a helpful degree of flexibility to respond positively to appropriately located development proposals which do come forward, such as the recently permitted Summerfield Homes site at Doniford Road, Watchet.	No change
15/5	WYG for Summerfield Developments (SW) Ltd.	SC2 – rep b	The Plan will not help the Council to demonstrate an adequate five year housing land supply. In order for the Plan to be found sound it must allocate more land to deliver the requirement.	Not effective	"	See response above, allocating a greater proportion of the housing provision in the plan could be counter-productive and lead to the refusal of planning permission for larger windfall sites which come forward.	No change
15/6	WYG for Summerfield Developments (SW) Ltd.	SC2 – rep c	There is no clear strategy for allocating sufficient land which is suitable for development in the area as per the NPPF requirement. Nor does the Plan indicate how land not yet allocated will be identified later in the plan period.	Not effective	The plan should indicate how land not yet allocated will be identified later in the plan period.	See above.	No change
15/7	WYG for Summerfield Developments (SW) Ltd.	SC2 – rep d	The 20% of the total to be provided at Villages is too great, particularly as most of these locations are relatively unsustainable, and are unsuitable for anything except for small scale development. A more sustainable strategy would result from providing a higher proportion of development at the three major settlements.	Not effective	The proportion of housing to be provided at the main settlements should be increased.	In view of the lack of development pressure in the Plan area, it is helpful to have a wide range of components to the potential land supply. Smaller scale development in the Primary and Secondary Villages has always been an important component in the completions within the Plan area and will hopefully continue to be so. Reducing the percentage of the total provision to be provided in villages will not bring forward more housing in the three main settlements, they relate to different aspects of the market.	No change
15/8	WYG for Summerfield Developments (SW) Ltd.	WA1 / WA2 – rep a	There is capacity to direct a greater proportion of housing to Watchet.	Not justified	The site at Liddymore Farm should be allocated as a key strategic site, potentially in association with the Doniford Road site which already has planning permission, instead of the WA2 site.	The Plan's approach of allocating some Key Strategic Development sites, and retaining a flexible approach to delivery of the remaining housing provision at the main centres means that other sites, possibly including that at Liddymore Farm subject to testing, will also be needed in order to fulfil the Plan's strategy.	No change
15/9	WYG for Summerfield Developments (SW) Ltd.	WA1 / WA2 – rep b	Concern remains that the WA2 Parsonage Farm site was not identified or assessed through the SHLAA process.	Not justified	"	The SHLAA process relies mainly on landowners submitting sites. The owners of the WA2 site did not submit it in response to the SHLAA call for sites. It is unlikely that the Plan's strategy could be fulfilled without some significant degree of development on the WA2 site. The WA2 site was assessed through the SHLAA as a broad strategic location for development.	No change

Ref. No.	Name of Representer	Policy / matter	Summary of representation	Soundness test cited	Suggested change	WSC comment	Proposed change.
15/10	WYG for Summerfield Developments (SW) Ltd.	WA1 / WA2 – rep c	The WA2 site will give rise to potential impact on the landscape setting of the town and the setting of the Parsonage Farm listed building group would also be damaged. It is not the most appropriate site when considered against reasonable alternatives	Not justified	“	Clearly there will be some impact of this type, it is considered that this can be mitigated through the masterplanning process. SA and the consideration of reasonable alternatives have been an integral part of the strategy development process.	No change
15/11	WYG for Summerfield Developments (SW) Ltd.	WA1 / WA2 – rep d	SHLAA refs. WAT4 & WAT6 at Liddymore Farm and Doniford Road Watchet both are capable of forming part of the 5 year housing land supply and could collectively be seen as a preferable alternative strategic site allocation instead of WA2.	Not justified	“	We note that there is planning permission on part of this land and some of it could potentially come forward through an initial release process. It is not big enough to form a Key Strategic Site.	No change
15/12	WYG for Summerfield Developments (SW) Ltd.	WA1 / WA2 – rep e	It has been demonstrated that the town centre is more accessible on foot from WAT4 & WAT6 than from WA2. The SA found that the two locations performed relatively similarly. WAT4 & WAT6 are less constrained than WA2 and should therefore be allocated instead.	Not justified	“	The issue has been considered and has been demonstrated to be a marginal deciding factor.	No change
15/13	WYG for Summerfield Developments (SW) Ltd.	WI1 / WI2 – rep a	There is capacity to direct a greater proportion of housing to Williton.	Not justified	The WIL3 site to the east of Williton should be allocated as a Key Strategic Site instead of the site allocated in the plan to the west of the village.	The Plan's settlement hierarchy has been through the iterative plan preparation process including the assessment of potential broad directions for growth prior to Key Strategic Site selection	No change
15/14	WYG for Summerfield Developments (SW) Ltd.	WI1 / WI2 – rep b	Concern remains that the WI2 'west of Williton' site was not identified or assessed through the SHLAA process. Grave concern is expressed as to the way in which this site was identified in preference to Summerfield's site to the east of the settlement. This is a very important consideration for the Inspector.	Not justified	“	The Plan's settlement hierarchy has been through the iterative plan preparation process including the assessment of potential broad directions for growth prior to Key Strategic Site selection	No change
15/15	WYG for Summerfield Developments (SW) Ltd.	WI1 / WI2 – rep c	The Council's Landscape Assessment and Historic Environment Issues Paper set out the damaging impacts of the West of Williton WI2 site. The SHLAA ref WIL3 land, controlled by Summerfield, to the east of Williton performs better in these terms and is more appropriate as a Key Strategic Site.	Not justified	“	It is considered that such impact can be appropriately mitigated. These are not the only factors involved.	No change
15/16	WYG for Summerfield Developments (SW) Ltd.	WI1 / WI2 – rep d	The land to the east of Williton enjoys better access to the village centre than would the allocated WI2 site to the west of the village.	Not justified	“	This is not the only factor involved.	No change
15/17	WYG for Summerfield Developments (SW) Ltd.	WI1 / WI2 – rep e	They disagree with the conclusions of the SA in respect of the WIL3 land to the east of Williton controlled by Summerfield.	Not justified	“	Noted.	No change
16/1	Home Builders Federation	Duty to Co-operate	The unresolved cross boundary housing issue between West Somerset Council and the Exmoor National Park Authority should be resolved before the Plan is submitted.	None stated	The unresolved housing provision issue with the National Park Authority should be resolved prior to submission.	It is resolved, the issue has been pursued as far as it can be.	No change
16/2	Home Builders Federation	SC2	The Council has not undertaken a full OAHN and the housing requirement is too low as a result. The Plan requirement should accordingly be reviewed prior to submission.	None stated	Review Plan housing requirement prior to submission.	The update was lower still, the council has opted for a challenging but realistic figure in the context of the proposed Hinkley Point new nuclear project.	No change
16/3	Home Builders Federation	SC1	It is not reasonably certain that there would be a 5 year housing land supply at the time of Adoption as the Plan is currently drafted. The Plan is therefore neither effective nor consistent with national policy. Also the Sedgfield rather than Liverpool approach to dealing with a shortfall should be adopted.	Not effective, not consistent with national policy.	The Council should provide additional information on the 5 year housing land supply position.	The SHLAA update is published alongside the submitted plan.	No change
16/4	Home Builders Federation	SC4	The approach is confusing, the Council should state clearly and explicitly in bullet point 2 and 5 that its target affordable housing provision is 35%.	None stated		The Council's position is that this is already done.	No change
16/5	Home Builders Federation	SC4 Bullet point 4	Williton should also be excluded from the requirement for affordable housing on sites of 6 – 10 dwellings in accordance with the Housing of Commons Written Statement (HCWS50) Support for Small Scale Developers, Custom and Self-Builders.	None stated		Williton shouldn't be excluded. SI 1997 N.621 States that only Minehead and Watchet are excluded.	No change
16/6	Home Builders Federation	SC3 bullets 3B and 3C also CC1, CC5 and NH10.	These policies will need to be checked against the outcomes of the Housing Standards Review etc.	None stated		Noted	No change
17/1	Smiths Gore for The Wyndham Estate	SD1	Compliant with national planning policy	Sound	None	Noted	No change
17/2	Smiths Gore for The Wyndham Estate	SC1	Doesn't meet the requirements of Paragraph 55 of the NPPF, neither will it meet the development needs of the area's smaller settlements. The focus on development at Minehead Watchet and Williton is however welcomed. The concept of an un-evidenced, arbitrary cap on development in the villages is however flawed and should be removed as being contrary to the NPPF.	Not consistent with national policy, not justified.	A more flexible approach, based on evidence as to what level of development is appropriate for each settlement should be introduced.	The Plan's strategy reflects the long term distribution of delivery. The approach is not contrary to para. 5.5.	No change
17/3	Smiths Gore for The Wyndham Estate	SC1 point 4	This section is not compliant with national policy and should be revised, it is unsound as drafted.	Not consistent with national policy	Amend to accord with national policy.	Disagree.	No change

Ref. No.	Name of Representor	Policy / matter	Summary of representation	Soundness test cited	Suggested change	WSC comment	Proposed change.
17/4	Smiths Gore for The Wyndham Estate	SC1 point 5	The Plan is now considered to be sound on this point, notwithstanding the matters raised above.	Sound	None	Noted.	No change
17/5	Smiths Gore for The Wyndham Estate	SC4	The policy fails to acknowledge the issue of financial viability and how this can affect the delivery of affordable homes.	Not Justified Not consistent with national policy	Amend to take account of market conditions affecting viability of development over time, also should be less prescriptive about the types of affordable housing being required.	This is contained within the NPPF, and its presence in policy is "not necessary" A strategic level viability assessment has been carried out but there may be variations on a site by site basis	No change
17/6	Smiths Gore for The Wyndham Estate	SC4 point 5.2	More flexibility and less prescriptiveness as to the mix of affordable housing to be sought is needed in order to ensure compliance with the NPPF.	Not consistent with national policy	Amend to accord with national policy	The policy does not seek to be prescriptive. Disagree.	No change
17/7	Smiths Gore for The Wyndham Estate	WA1	The policy correctly identifies the key issues that need to be addressed by future development at Watchet.	Sound	None	Noted.	No change
17/8	Smiths Gore for The Wyndham Estate	WA2	The proposed allocation is considered to represent the most sustainable location for future development at Watchet.	Sound	None	Noted.	No change
17/9	Smiths Gore for The Wyndham Estate	WI1	The policy correctly identifies the key issues that need to be addressed by future development at Williton.	Sound	None	Noted.	No change
17/10	Smiths Gore for The Wyndham Estate	WI2	The proposed allocation is considered to represent the most sustainable location for future development at Williton.	Sound	None	Noted.	No change
17/11	Smiths Gore for The Wyndham Estate	OC1	Conflicts with para 55 of the NPPF.	Not consistent with national policy	It must be amended, particularly in respect of residential conversion schemes to make it compliant with the NPPF.	Due to an error, the last part of the policy, beginning "Applications for dwellings...", appeared in the wrong place making it read as if this section applies to all the dwelling types mentioned in the policy. This section of the policy should follow on from "...or hunting employment," and before "or". The policy should be corrected to read as follows: <i>"Residential development in the open countryside (land not adjacent or in close proximity to the major settlements, primary and secondary villages) will only be permitted where it can be demonstrated that either:</i> <ul style="list-style-type: none"> <i>Such a location is essential for a rural worker engaged in eg: agricultural, forestry, horticulture, equestrian or hunting employment. (Applications for such dwellings would be considered subject to a functional and financial test. Where permission is granted consideration would be given to this being initially made on a temporary basis), or;</i> <i>it is provided through the conversion of existing, traditionally constructed buildings in association with employment or tourism purposes as part of a work / live development, or;</i> <i>it meets an ongoing identified local need for affordable housing in the nearby settlement which cannot be met within or closer to the settlement, or;</i> <i>it is an affordable housing exceptions scheme adjacent to, or in close proximity to, a settlement in the open countryside permitted in accordance with policy SC4(5)."</i> 	Amend policy to read as set out to the left.
17/12	Smiths Gore for The Wyndham Estate	EC6	It is unreasonable to require that the work space element will for the majority of floor space in a work/live unit. Household / business types which might use this sort of accommodation vary considerably, not all of them require large areas of floorspace. The use of the workspace element can be controlled by condition.	Not justified when considered against other reasonable alternatives.	The policy should be amended accordingly.	If the suggested change were to be made, then houses could be provided through it which were indistinguishable from any other similarly sized houses with a room which could be used as an office. This is not the intention of the policy.	No change
17/13	Smiths Gore for The Wyndham Estate	EC9	The third criterion in the policy is too restrictive as private car travel is often the only viable way of reaching large parts of the Plan area. Its application is likely to negate much of the benefit of the policy.	Not consistent with national policy	Amend the policy to bring it in line with national policy.	This failsafe clause is necessary to managing such development.	No change

Ref. No.	Name of Representer	Policy / matter	Summary of representation	Soundness test cited	Suggested change	WSC comment	Proposed change.
17/14	Smiths Gore for The Wyndham Estate	TR1	The removal of the word "larger" from the first sentence of the policy means that it now applies to all development, which is contrary to national policy and entirely unreasonable in relation to smaller scale rural development. The NPPF paras. 29 and 34 refer to the need to adopt different transport approaches in rural areas.	Not consistent with national policy & not justified.	Reinstate the word 'larger' in the policy.	The travel plan thresholds ensure that the policy is applied in a proportionate way.	No change
18/1	Amec Foster Wheeler for The Crown Estate	SC1, SC2 MD2	The Plan requires additional site allocations to meet a shortfall of circa 1000 homes once existing commitments and site allocations are taken into account. The plan's only mechanism for delivering the remainder being windfalls and unidentified sites within villages and broad locations post 2026. Dunster Marsh should be amended to provide 215 dwellings as part of the Key Strategic Site allocations for the Local Plan. Without such changes it will not be possible to maintain a 5 year supply of housing land. A detailed housing trajectory must be added to the plan	Not justified, effective, positively prepared or consistent with national policy.	Allocate additional Key Strategic Sites under policy SC2. Add a detailed housing trajectory. Amend MD2 to include Dunster Marsh as part of the strategic allocation.	The housing trajectory is included in the updated SHLAA. It is not proposed to allocate all the plan's requirement in the interests of flexibility. Dunster Marsh was rejected as a strategic site through the Members' strategic site selection process.	No change
19/1	JLL for Mrs C Shapland	SD1	The policy is supported.	Sound.	none	noted	No change
19/2	JLL for Mrs C Shapland	SC1	More of the strategy's housing should be provided at Minehead.	None stated	Amend Plan accordingly.	The Plan's settlement hierarchy has been through the iterative plan preparation process including the assessment of potential broad directions for growth prior to Key Strategic Site selection	No change
19/3	JLL for Mrs C Shapland	SC2	The plan's reliance on windfall development is contrary to national policy. More sites should be allocated at Minehead including that put forward in this representation. This is partly to provide more chance of the strategy being fulfilled, but also to allow for non-implementation of sites which might occur.	Not consistent with national policy.	Amend Plan accordingly.	Para 48 allows this. The allocation of a higher proportion of the housing requirement in the plan would reduce the flexibility available to manage implementation of the plan.	No change
19/4	JLL for Mrs C Shapland	SC4	The 35% affordable housing specified in this policy is not supported by evidence and may make the development of the plan's sites unviable. 35% was not achieved in the area in the housing boom which preceded the downturn, so it is even less likely to be achieved in present conditions.	Not Justified	Amend Plan accordingly.	The Strategic Land Viability Assessment and Strategic Housing Land Availability Assessment refer. 35%+ affordable housing has been achieved in West Somerset in the recent past.	No change
19/5	JLL for Mrs C Shapland	SC5A	The policy is supported.	Sound.	none	noted	No change
19/6	JLL for Mrs C Shapland	MD1	The gist of the policy is supported. The representation also recommends a site at Bratton Lane as a development proposal capable of accommodating c.55 dwellings.	None stated	Allocate site for 55 dwellings at Bratton Lane.	The site was assessed through the SHLAA process and was found to be unsuitable for development.	No change
19/7	JLL for Mrs C Shapland	MD2	The gist of the policy is supported. The representation also recommends that more sites be allocated at Minehead including a site at Bratton Lane as a development proposal capable of accommodating c.55 dwellings.	None stated	Allocate site for 55 dwellings at Bratton Lane.	The site was assessed through the SHLAA process and was found to be unsuitable for development.	No change
19/8	JLL for Mrs C Shapland	EC1	The policy is supported	None stated	None	noted	No change
19/9	JLL for Mrs C Shapland	EC6	The policy is supported	None stated	None	noted	No change
19/10	JLL for Mrs C Shapland	TR2	The benefits of modal choice in Minehead make it a suitable location for additional strategic development.	Sound.	none	noted	No change
19/11	JLL for Mrs C Shapland	CF2	The benefits of a good level of services in Minehead make it a suitable location for additional strategic development.	Sound.	none	noted	No change
19/12	JLL for Mrs C Shapland	CC1	The policy is supported.	Sound.	none	noted	No change
19/13	JLL for Mrs C Shapland	NH2	The policy is supported.	Sound.	none	noted	No change
19/14	JLL for Mrs C Shapland	NH3	The policy is supported.	Sound.	none	noted	No change
19/15	JLL for Mrs C Shapland	NH4	The policy is supported.	Sound.	none	noted	No change
19/16	JLL for Mrs C Shapland	ID1	There are question marks over the soundness of the Plan in respect of the infrastructure to deliver the key strategic sites not having been costed.	Not justified.	KSS infrastructure costs should be calculated in order to inform viability evidence.	These would be identified as part of the masterplanning process. The infrastructure information supporting plan preparation is based on the responses received from the relevant infrastructure providers.	No change
20/1	Grass Roots Planning Ltd. For SW Strategic Developments.	SD1	Supportive of its content but question whether it is required as it duplicates national policy.	Not justified, effective, positively prepared or consistent with national policy.	Consider removal.	This is the government's model sustainable development presumption policy.	No change
20/2	Grass Roots Planning Ltd. For SW Strategic Developments.	SC1	Support the identification of Watchet as a rural service centre, but question the reference to development in the primary settlements as having to be generally proportionate to their roles and functions to their own communities. The external factor of the Hinkley Point project means that the wording of the policy is not appropriate as it stands.	Not justified, effective, positively prepared or consistent with national policy.	Amend policy accordingly.	This issue has been addressed through the Hinkley Point DCO process.	No change

Ref. No.	Name of Representer	Policy / matter	Summary of representation	Soundness test cited	Suggested change	WSC comment	Proposed change.
20/3	Grass Roots Planning Ltd. For SW Strategic Developments.	SC2	The general level of housing proposed in the Plan is supported, however in order to be responsive to changing circumstances the figure should be expressed as a minimum in the policy. Leaving 50% of the Plan's provision to be delivered on unallocated sites is unnecessarily risky, consideration should be given to allocating additional land adjacent to the three main centres. Significant soundness problems are suggested with the Council's five year housing land supply situation, failure to propose meeting the existing backlog within the first five years of the plan, proposing a 5% buffer rather than a more appropriate 20% buffer in particular. The supply presented is not deliverable.	Not justified, effective, positively prepared or consistent with national policy.	Amend policy accordingly In relation to the housing land supply situation, a 20% buffer should be applied and an interim release of sites be actioned.	The use of the word "approximately" facilitates a helpfully flexible approach in response to a constantly changing context for development. In relation to the suggestion of a larger 'buffer' this is not accepted. The plan needs to be deliverable, and must be able to respond to market fluctuations. The Plan is already challenging with a housing requirement 23% above the long term delivery trend.	No change
20/4	Grass Roots Planning Ltd. For SW Strategic Developments.	SC4	The requirement for 35% affordable housing is likely to have an adverse impact on the viability of schemes to the extent that larger housebuilders are not likely to take an interest in developing within the area. Other authorities in this situation have been more pragmatic, eg: Taunton Deane which has adopted a 25% target in its Core Strategy. Development and affordable units have actually been provided under this policy. Providing for 25% in West Somerset making clear that this is a minimum would help to attract developers into the area.	Not justified, effective, positively prepared or consistent with national policy.	Amend policy accordingly	The Council's Strategic Housing Land Viability Assessment covers this.	No change
20/5	Grass Roots Planning Ltd. For SW Strategic Developments.	WA1	The policy is generally supported, however the reference to flood risk issues be removed from the policy. The policies provisions relating to allotments and better links across the railway are supported, as is the long term protection for the West Somerset Railway.	Not justified, effective, positively prepared or consistent with national policy.	Remove reference to flood risk issues.	Surface water issues affect all sites to some extent. CC2 also refers.	No change
20/6	Grass Roots Planning Ltd. For SW Strategic Developments.	WA2	The allocation of land to the east of Watchet on the site proposed by the representation is preferred to the WA2 site on landscape grounds in particular. However, the allocation of land to the east is not dependent on deletion of WA2. In any case, an interim release of housing land is likely to be needed to address the chronic land supply problem.	Not justified, effective, positively prepared or consistent with national policy.	The WA2 site should be reduced in size and an allocation be made to the east of Watchet.	The site was considered through the SHLAA process, it was not considered big enough to be a Key Strategic Site. The Council will in any case be considering an interim release of appropriate sites, and this site could be assessed as part of that process.	No change
20/7	Grass Roots Planning Ltd. For SW Strategic Developments.	LT1	The approach of reserving the LT1 sites until post 2026 is mistaken as additional sites are needed early in the plan period. The policy should be overhauled to provide for immediate release of additional sites as demanded by the land supply situation. Also, the Cleeve Hill LT1 site is unsuitable for the proposed development.	Not justified.	The LT1 site is not appropriate for development and should be deleted.	These sites are reserved for longer term development and as a contingency.	No change
20/8	Grass Roots Planning Ltd. For SW Strategic Developments.	Proposed additional site WA3	Strategic Development allocation at Normandy Avenue, Watchet. This site would address the five year HLS deficit and compensate for any necessary reduction in the scale of the WA2 site. The proposal would provide a housing site, a new parkland open space, ecological benefits and would integrate Normandy Avenue into the town.	None stated	Land at Cherry Tree Way / Normandy Avenue to the east of Watchet should be allocated for development to supplement the town's allocations.	The site was considered through the SHLAA process, it was not considered big enough to be a Key Strategic Site. The Council will in any case be considering an interim release of appropriate sites, and this site could be assessed as part of that process.	No change
20/9	Grass Roots Planning Ltd. For SW Strategic Developments.	Proposed permissive development policy	Additional allocations are necessary in order to address the 5 year HLS deficit. Assuming that 50% of the plan's provision would come forward on unallocated sites is inappropriate. If the Council reject additional allocations, a permissive development policy should be added to the plan to facilitate the necessary additional development.	None stated	Add new policy: DEVELOPMENT WITHIN OR IN CLOSE PROXIMITY (WITHIN 50 METRES) TO THE CONTIGUOUS BUILT-UP AREA OF MINEHEAD/ALCOMBE, WATCHET AND WILLITON WILL BE CONSIDERED FOR DEVELOPMENT WITHIN THE FIRST FIVE YEARS OF THE PLAN PERIOD WHERE IT CAN BE DEMONSTRATED THAT: A. IT IS WELL RELATED TO EXISTING ESSENTIAL SERVICES AND SOCIAL FACILITIES WITHIN THE SETTLEMENT, AND; B. THERE IS SAFE AND EASY PEDESTRIAN ACCESS TO THE ESSENTIAL SERVICES AND SOCIAL FACILITIES WITHIN THE SETTLEMENT, AND; C. IT RESPECTS THE HISTORIC ENVIRONMENT AND COMPLEMENTS THE CHARACTER OF THE EXISTING SETTLEMENT, AND; D. IT DOES NOT GENERATE SIGNIFICANT ADDITIONAL TRAFFIC MOVEMENTS OVER MINOR ROADS TO AND FROM THE NATIONAL PRIMARY AND COUNTY HIGHWAY ROUTE NETWORK E. IT DOES NOT HARM THE AMENITY OF THE AREA OR THE ADJOINING LAND USES.	The mechanism the Council has identified for the interim release of housing sites is a more effective way of addressing this issue.	No change

Ref. No.	Name of Representer	Policy / matter	Summary of representation	Soundness test cited	Suggested change	WSC comment	Proposed change.
21/1	Acorn Rural Property Consultants for Thorne, Thorne and Doggrell.	SC1 & SC2	The reliance of the Plan on windfall and unallocated sites for 50% of its development total is inconsistent with para. 47 of the NPPF because it would not significantly boost the supply of housing in the area. The Plan is already under-delivering. There is no up to date SHLAA and the Council doesn't have a 5 year HLS. The Plan is rendered ineffective because it fails to identify more deliverable sites. The site put forward with the representation is put forward as just such a site.	Not justified, effective, positively prepared or consistent with national policy.	Additional housing sites should be allocated, in particular the site put forward by the respondent at Porlock Road, Minehead totalling 4.4ha.	Flexibility is helpful, the SHLAA is published alongside the Submission Local Plan. The Council does have a five year supply of housing land. The site was considered through the SHLAA process, it was not considered big enough to be a Key Strategic Site. The Council will in any case be considering an interim release of appropriate sites, and this site could be assessed as part of that process.	No change
22/1	Niki Denning	SC1	Huish Champflower has been inappropriately classified in the policy as 'open countryside'. On the basis of the facilities in the village it should be a Secondary Village.	Not justified.	Huish Champflower should be added to the list of Secondary Villages in SC1(3)	The settlement is not considered to satisfy the criteria needed to be a Secondary Village. The Town and Village Centres Study refers.	No change
23/1	C R Durham	TR1	The policies downplay the importance of main road links to West Somerset and their need for improvement. This is distinct from the availability of funding to address such issues. Development should ideally be redistributed to the east of the District within cycling distance of the Taunton / Bridgwater corridor if jobs can't be created in Minehead. Funding prospects may improve in the future, also, if employment aspirations for West Somerset are not realised, the roads will need to be improved for commuters travelling to Taunton and Bridgwater.	Not effective or positively prepared.	Detailed wording amendments are proposed to the policy to effect these changes.	Minehead is the most sustainable location for significant new development within the Local Planning Authority area due to its very high level of self containment.	No change
24/1	Savills for the Caravan Club	MD1 & MD2	The representation seeks the allocation of the Caravan Club's land at Minehead as a housing site.	Not justified.	Seeks the allocation of the Caravan Club's site in Hopcott Road as a housing site.	This land is already part of the Plan's MD2 Key Strategic Site allocation.	No change
25/1	S Powley	Whole Plan	There has been a lack of due process, consultation and due diligence on the amended Plan, in particular in relation to Williton. The site north of Danesfield School is outside the settlement boundary. This site has not been previously referred to in the process, and other options have not been properly investigated. The need for so much housing is questioned. A range of adverse impacts would arise from development of the site including those on traffic, ecology and landscape.	Not justified, effective, or positively prepared.		The Plan's strategy has been evolved through an iterative process, involving Sustainability Appraisal and the application of the evidence base items and the results of public engagement. See EC4 and EC6.	No change
26/1	Gladman Developments Ltd.	Housing Evidence and whole plan.	The Plan will fail to meet the full objectively assessed housing need for the area, and the Duty to Co-operate has not been properly fulfilled. SHMAs need to have been reviewed post-NPPF in order to be compliant. NPPG considerations for assessing OAN have not been applied. In essence the suggested response to the challenging supply situation in West Somerset is to increase the supply of housing land beyond that included in the Plan.	Not justified, effective, positively prepared or consistent with national policy.	Housing evidence should be updated and substantial additional housing land supply should be included.	The housing evidence has been reviewed for the 2012 update, Objectively Assessed Need has been reviewed in the light of this update, the Plan providing for more development.	No change
26/2	Gladman Developments Ltd.	SC1	The Council must review its evidence base in the light of the NPPF and NPPG guidance in order to ascertain what the OAN figure for the Plan area is. This should include taking account of the 2012 CLG projections. The current level of housing proposed is inadequate. The Council should not seek to implement its spatial strategy until the full OAN has been identified. However the principle of allocating growth to the main service centres in the area is supported. Sustainable Urban Extensions are frequently difficult to implement due to land ownership problems and expensive masterplanning. The restrictive approach to development in the Primary and Secondary villages to only 5% or 10% is also unjustified. If the spatial distribution in the Plan's strategy doesn't reflect OAN then the housing required may not be delivered.	None stated		The Evidence base has already been reviewed. The idea of increasing the village development proportion is both contrary to the long term trend, and would not be sustainable.	No change
26/3	Gladman Developments Ltd.	SC3	The approach of the policy is supported subject to regular review of the required housing mix in various parts of the area.	None stated		Noted.	No change
26/4	Gladman Developments Ltd.	SC4	All affordable housing should be delivered off site where it is most needed. Adverse market signals should be taken into account by increasing the amount of housing provided for / allocated in the Plan.	None stated		Disagree.	No change
26/5	Gladman Developments Ltd.	LT1	If sites are sustainable they should go ahead without delay, the approach put forward in the policy is contrary to the NPPF.	Not consistent with national policy	The policy is unsound and should be deleted.	No absolute bar on their development, but the other allocated sites should be developed first.	No change
26/6	Gladman Developments Ltd.	SV1	Clauses SC1 (2) & (5) will prevent this policy from being implemented. The Council should recognise the key role that rural villages can play in the delivery of sustainable development to meet the identified housing need.	Not consistent with national policy		The two policies are designed to complement each other.	No change
26/7	Gladman Developments Ltd.	OC1	The policy seeks to prevent development in open countryside areas which are not adjacent to or close to major settlements or Primary / Secondary villages. The policy should not seek to prevent development on sites outside of settlement limits.	Not consistent with national policy	The policy should be re-worded to reflect the positive wording in the NPPF.	It won't do so, so long as they are compliant with SD1	No change
26/8	Gladman Developments Ltd.	NH3	Biodiversity considerations should not be used as a reason to prevent sustainable development schemes going ahead. Good design can often improve biodiversity whilst facilitating development.			Noted	No change
26/9	Gladman Developments Ltd.	NH5	The Council's policy is more restrictive than the approach set out in para. 112 of the NPPF. Sustainable development potential of sites and the local need for housing should be balanced against the protection of BMV agricultural land.	Not consistent with national policy	The policy should be deleted.	In practice this is unlikely to be an issue given the scale of development proposed.	No change

Ref. No.	Name of Representor	Policy / matter	Summary of representation	Soundness test cited	Suggested change	WSC comment	Proposed change.
26/10	Gladman Developments Ltd.	NH10	The policy places an undue burden on developers and is likely to undermine the viability of schemes. The NPPF (para. 173) requires that Plans' strategies should be deliverable, and that includes the sites being viable. The policy should ensure that the policy is not overly prescriptive and not impose particular architectural styles or stifle innovation.	Not effective	The policy should be modified accordingly.	SHLVA deals with viability. The design approach will be provided through the government's national housing standards review.	No change
26/11	Gladman Developments Ltd.	ID1	The plan should be deliverable, and this includes not requiring too onerous planning obligations, such that the viability of schemes is prevented. Such a policy seeking developer contributions should be appropriately tested.	Not positively prepared	The policy should be subject to testing.	It will be, through the masterplanning process.	No change
26/12	Gladman Developments Ltd.	Duty to co-operate.	Determining Objectively Assessed Need must be carried out with full regard to the DTC. DTC discussions relating to OAN have been commenced with SDC, TDBC and ENPA, but none of these have been satisfactorily concluded. The area of consultation should be widened until OAN can be met.	Not consistent with national policy		Maximising affordable housing providing in excels of market housing, TDBC & SDC can't accommodate shortfall, ENPA discussions have been taken as far as possible, no further action was achievable.	No change
28/13	Gladman Developments Ltd.	Sustainability Appraisal	The SA is acknowledged, however, it fails to analyse a suite of reasonable alternatives in respect of whether the Council is capable of delivering a higher housing requirement which would reduce the affordability gap currently affecting the District. It therefore does not meet the SEA directive or PPG requirements.	Not justified, effective, positively prepared or consistent with national policy.	Following OAN updating, the council should test its SA to assess whether a higher housing requirement to encourage a 'pro-growth' scenario in line with the requirements of the Framework can be delivered.	The Plan has been prepared through Issues, Options, Preferred Strategy and Revised Preferred Strategy stages informed by SA, evidence results of consultation etc. including the testing of reasonable alternatives at the appropriate stages.	No change
26/14	Gladman Developments Ltd.	Overall soundness	Gladman consider the plan to be unsound for the above reasons, particularly that it is not positively prepared or compliant with the National Planning Policy Framework.	Not justified, effective, positively prepared or consistent with national policy.		See comments made in response to Gladman's representations above.	No change
27/1	Smiths Gore for F Slade.	SC1	Sets out a sustainable approach which is consistent with the principles of the NPPF.	Sound	None	Noted	No change.
27/2	Smiths Gore for F Slade.	SC2	The approach set out in the plan is consistent with the NPPF's aim "to boost significantly the supply of housing".	Sound	None	Noted	No change.
27/3	Smiths Gore for F Slade.	MD1	The criteria set out in the policy are consistent with a wide range of policies within the NPPF	Sound	None	Noted	No change.
27/4	Smiths Gore for F Slade.	MD2	The allocation and density are supported, however, the requirement relating to the distributor road with two accesses is too specific and should be left to the masterplanning process to determine. Also, the requirement for an element of non-residential use should be further considered.	Not effective.	Delete the requirement for a distributor road and non-residential uses on the site.	This land is subject to a current planning application.	No change.
28/1	MWA for J Gliddon & Sons	WI1	The Plan is considered to be sound apart from this policy. The NPPF requires LPAs to proactively provide for the needs of their communities. The general approach of the policy is supported, however it does not identify how the present and future needs of the community are to be met. In particular the policy fails to explain how future investment / development can be accommodated particularly in relation to retail and commercial uses.	Not positively prepared or consistent with national policy.	Amend policy accordingly.	All the policies in the Plan apply where their content is relevant. This issue is really one for development management policy.	No change
29/1	NLP for Bourne Leisure Ltd.	SD1	The policy is endorsed.	Sound	None	Noted	No change
29/2	NLP for Bourne Leisure Ltd.	MD1	The policy is endorsed in principle, however it should go further and explicitly cite Butlins as the town's key tourism asset. It should support development proposals seeking the retention consolidation and enhancement of Butlins Resort. The policy should also specifically allow operators to undertake / contribute towards sea defences to protect their sites and operations.	Not effective or consistent with national policy.	Amend the policy accordingly.	It is a strategic policy.	No change
29/3	NLP for Bourne Leisure Ltd.	EC1	Tourism should be named as a key employment generating activity in the policy, this would be in compliance with the NPPF.	Not effective or consistent with national policy.	Tourism should be specifically identified as a key employment generating activity in the policy.	Tourism's importance in the policy is self-evident because of its significance as an economic sector locally.	No change
29/4	NLP for Bourne Leisure Ltd.	EC8	The policy is welcomed, however it should be amended to refer to promoting other forms of tourism development such as visitor accommodation and other locations which can increase tourism business in the area which would be more in line with the NPPF.	Not effective or consistent with national policy.	The policy should be redrafted as follows: "New tourism development and the redevelopment / expansion of existing tourism facilities which increases the range of open air and wet weather attractions / activities within existing settlements will be encouraged subject to an appropriate location for the use proposed and appropriate proposals for the management of: • parking, • amenity impact, and; • accessibility, subject to the provisions of clauses A to E of policy SC1."	This detailed material is more appropriate for development management policy.	No change
29/5	NLP for Bourne Leisure Ltd.	EC9	Additional clarity is needed on the application of the proposed criteria in the policy. The appropriate evidence for testing need and alternative locations should be specified. Many tourism businesses in the area need to be sited close to the sea by their nature, expansions of these businesses also need to be in this kind of location. As drafted it is not compliant with the NPPF.	Not effective or consistent with national policy.	Reword policy to make clear that being outside of settlements is not the only determining factor in judging its acceptability.	Policy SD1 refers,	No change
29/6	NLP for Bourne Leisure Ltd.	EC10	The policy is endorsed in principle, however the wording should be amended to specify that the provision of a range of tourist accommodation and facilities are encouraged.	Not effective or consistent with national policy.	The policy should be amended to full recognise and refer to Minehead's role as a tourist destination in its own right and as a gateway to the wider local plan area.	Policy SD1 refers,	No change

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29/7	NLP for Bourne Leisure Ltd.	TR2	The Plan fails to recognise the essential car-dependent nature of development such as touring caravan sites. Many other tourism uses are car dependent. The policy should reflect the NPPF and recognise that sometimes there is no alternative. The policy should also encourage the improvement of cycle and pedestrian routes for movement of tourists whilst visiting the area.	Not effective or consistent with national policy.	Amend policy accordingly.	Policy SD1 refers,	No change
29/8	NLP for Bourne Leisure Ltd.	CC2	The policy is endorsed in principle, and in particular the fact that development can be designed to mitigate against any increased flood risk which might otherwise arise from it. The Plan should take account of the special flood risk which arises from the coastal location of some tourism development which cannot be located elsewhere. Recognition should also be given to the essential need to maintain coastal locations for many tourist industry developments within the area, business owners and operators should be able to contribute to the provision maintenance and improvement of existing coastal defence works which protect their interests.	Not effective or consistent with national policy.	Amend policy accordingly.	This is a coastal management issue policy CC4 refers.	No change
29/9	NLP for Bourne Leisure Ltd.	CC4	The policy is endorsed in principle, however some additional information is needed to define how the test in the policy would be assessed. Some tourism development needs to be in close proximity to the sea.	Not effective or consistent with national policy.	Add this text to the policy: <i>"The part of the tourism industry relating to seaside tourism activities needs to develop some tourism related facilities in that sensitive environment."</i>	The suggested amendment is not necessary, the existing policy content covers this point.	No change
29/10	NLP for Bourne Leisure Ltd.	Para. 2.7	The reference to Butlins Holiday Centre in Minehead is welcomed, as is the reference to tourism as one of the major sources of employment in the area.	Sound	None	Noted	No change
29/11	NLP for Bourne Leisure Ltd.	Paras. 5.0 – 5.3	The Spatial Vision is endorsed, however additional material should be added on the benefits that tourism can bring to the local area. Specific reference should be made to the existing sites and how their expansion would be beneficial. This would provide better alignment with the strategic objectives of the plan and the subsequent policies.	Sound	Add appropriate additional text to the Spatial Vision as described.	Noted.	No change
30/1	Low Carbon Partnership – West Somerset and Exmoor.	SD1	The wording is vague and permissive, showing no urgency regarding climate change and how the community might become resilient to its effects.	Not effective or positively prepared.	Add reference to the Renewable and Low Carbon Energy Study recommendations eg: to produce an energy hierarchy to mitigate climate change and promote renewables as examples of using natural resources prudently.	This is central government's model policy, inclusion of which is required in Local Plans.	No change
30/2	Low Carbon Partnership – West Somerset and Exmoor.	SC1	The hierarchy of settlements doesn't take account of the increasing use of low carbon energy generation, transport and energy conservation measures providing for low carbon occupation of more remote locations.	Not effective or positively prepared.	Amend policy accordingly.	Noted.	No change
30/3	Low Carbon Partnership – West Somerset and Exmoor.	SC2	Alternative funding for low cost housing is not included – eg: Somerset Community Land Trust.	Not effective or positively prepared.	Amend policy accordingly.	The definition of affordable housing types given is not exhaustive.	No change
30/4	Low Carbon Partnership – West Somerset and Exmoor.	SC3	There is a contradiction in any larger open market homes being needed in an area of generally low wages. Rental properties would be most helpful to low income residents with insecure jobs who need to be mobile to follow employment opportunities.	Not effective or positively prepared.	Amend policy accordingly.	The policies have been informed by the Strategic Housing Market Assessment and the Council's local housing needs information.	No change
30/5	Low Carbon Partnership – West Somerset and Exmoor.	EN2	Sound as far as it goes but imminent development of Severn Tidal Power is not referred to which is a considerable omission. Some sites being investigated would impact directly on the Plan area.	Not effective or positively prepared.	Amend policy accordingly.	This is a general, strategic policy which is sufficiently flexible to address such types of development.	No change
31/1	Quantock Hills AONB Service	Para 5.3	No reference is made to protected landscapes, nor is there any reference in the 'vision' section as to how the Council intends to safeguard them into the future. The Quantock Hills AONB must be included here for appropriate treatment of the issue in the Plan.	Not consistent with national policy.		The Spatial Vision focuses on development in the area, policies NH2, 3 and 4 cover this matter.	No change
31/2	Quantock Hills AONB Service	NH2	The Plan should include a policy dedicated to protecting the nationally designated landscapes within the Plan area, not just a reference in the text to appropriate design of schemes within such areas. Current approach of the Plan is not consistent with NPPF para. 14.	Not consistent with national policy.	Sedgemoor District Council's policy is set out as an example: <i>"Landscape – Development proposals within the Mendip Hills AONB or the Quantock Hills AONB will only be supported where they enhance or conserve the natural beauty, or the exceptional character or quality of the landscape in these areas. Elsewhere in the District proposals should ensure that they enhance the landscape quality wherever possible or that there is no significant adverse impact on local landscape character, scenic quality and distinctive landscape features."</i>	AONBs are protected by virtue of their national statutory designated status. A policy such as that proposed does nothing to increase their level of protection through the planning system.	No change
31/3	Quantock Hills AONB Service	OC1	Explicit reference should be made to the fact that development in open countryside within AONBs will only be permitted where it would not cause harm to landscape character and scenic beauty and that it will be strictly controlled. (NPPF paras. 113, 115 and 14 refer).	Not consistent with national policy.		The Plan must be read as a whole. OC1 is about types of development which may exceptionally be permitted in such areas. NH2 also refers.	No change
31/4	Quantock Hills AONB Service	SD1	Specific reference should be made in the policy to the AONB and National Park within West Somerset. This would be in line with footnote 9 to the NPPF which clearly identified nationally protected landscapes as areas where development should be restricted.	Not consistent with national policy.		This is central government's model policy, inclusion of which is required in Local Plans.	No change
31/5	Quantock Hills AONB Service	EN1	Consideration must be given in the policy to potential impacts on the wider landscape particularly those that are visually vulnerable such as the Quantock Hills AONB. This would also support Para 115 of the NPPF. The scenic beauty of the Quantock Hills AONB would be afforded greater protection by inclusion of the suggested text.	Not consistent with national policy.	Change the 3 rd bullet of the policy thus: <i>"They respect the local natural environment in which they are located and from which they are seen"</i> .	Disagree – the AONB is designated in order to protect the quality of the landscape extending to its boundaries.	No change

Ref. No.	Name of Representer	Policy / matter	Summary of representation	Soundness test cited	Suggested change	WSC comment	Proposed change.
31/6	Quantock Hills AONB Service	SC1	As a number of the primary and secondary settlements are villages within the Quantock Hills AONB, explicit reference should be made to the fact that development in AONB villages will only be permitted where it would not cause harm to landscape character and scenic beauty (in line with paras 113 and 115 of the NPPF).	Not consistent with national policy.	Amend policy accordingly.	The Plan must be read as a whole. NH2 also refers.	No change
31/7	Quantock Hills AONB Service	SC4	Policy SC4 should make explicit reference to the fact that development of affordable housing within the AONB will be not be permitted where it would be harmful to landscape character and scenic beauty (thereby threatening the national designation). The affordable housing scheme at Higil Lea (Crowcombe) was treated as an exception site and has resulted in adverse impacts to landscape character and scenic beauty within the Quantock Hills.	Not consistent with national policy.	Amend policy accordingly.	The AONB is not green belt, appropriately designed and sited development of a suitable scale can be provided within an AONB without harming AONB objectives.	No change
31/8	Quantock Hills AONB Service	MD2	There should be reference within the policy or in the supporting text to Minehead's geographical proximity to the Quantock Hills AONB. The policy identifies that the land is not constrained by landscape or nature conservation designations but does not recognise the nationally important landscape nearby. This does not properly reflect para 113 of the NPPF which states that "Distinctions should be made between the hierarchy of international, national and locally designated sites so that the protection is commensurate with their status and gives appropriate weight to their importance..."	Not consistent with national policy.	Amend policy accordingly.	AONBs are protected by virtue of their statutory status, the proposed change is not considered to be appropriate.	No change
31/9	Quantock Hills AONB Service	WA2	There should be reference within the policy or in the supporting text to Watchet's geographical proximity to the Quantock Hills AONB given that the open heathland summits offer clear views across the area. The policy identifies that the land is not constrained by landscape or nature conservation designations but does not recognise the nationally important landscape nearby. This does not properly reflect para 113 of the NPPF which states that "Distinctions should be made between the hierarchy of international, national and locally designated sites so that the protection is commensurate with their status and gives appropriate weight to their importance..."	Not consistent with national policy.	Amend policy accordingly.	AONBs are protected by virtue of their statutory status, the proposed change is not considered to be appropriate.	No change
31/10	Quantock Hills AONB Service	WI2	There should be reference within the policy or in the supporting text to Williton's geographical proximity to the Quantock Hills AONB given that the open heathland summits offer clear views across Williton. The policy identifies that the land is not constrained by landscape or nature conservation designations but does not recognise the nationally important landscape nearby. This does not properly reflect para 113 of the NPPF which states that "Distinctions should be made between the hierarchy of international, national and locally designated sites so that the protection is commensurate with their status and gives appropriate weight to their importance..."	Not consistent with national policy.	Amend policy accordingly.	AONBs are protected by virtue of their statutory status, the proposed change is not considered to be appropriate.	No change
31/11	Quantock Hills AONB Service	Para 2.2 and Map 1	This paragraph makes reference to Figure 1 as 'the Local Plan Area set in its context'. The map should show the Quantock Hills AONB as well as the wider context of the adjoining districts or Boroughs. The graphics offer no sense of the coastal context of West Somerset.	Not consistent with national policy.	Provide more detailed map showing geographical and landscape designation context.	The purpose of Map 1 is to show which settlements lie within the Plan area, planning constraints are not appropriate for inclusion as they would render the map significantly more difficult to read for its intended purpose. The AONB boundary is clearly shown on the proposals map.	No change
31/12	Quantock Hills AONB Service	Para 2.3	The variety of landscape on the Quantocks should be described to improve public understanding of the AONB as more than just the heathland summits, much of the Quantock Hills is lowland heath, which is not typically referred to as 'moorland' which is the reference made in the draft text.	Not consistent with national policy.	The third bullet of the list could be amended as follows: <i>"The northwestern part (approximately one third) of the Quantock Hills – notable for its open heathland summits, as well as deep wooded combes, rich farmland and Jurassic coast".</i>	Noted	No change
31/13	Quantock Hills AONB Service	Para 2.9	Part of this paragraph reads <i>"The part of the Quantock Hills within the Local Plan is designated as an Area of Outstanding Natural Beauty"</i> . This is an awkward sentence and also implies that there are areas of the Quantock Hills that are not designated.	Not consistent with national policy.	A possible amendment to the text could be: <i>"Approximately one third of the Quantock Hills Area of Outstanding Natural Beauty falls within the boundaries of West Somerset District. The Quantock Hills share the same level of statutory landscape protection as Exmoor National Park".</i>	Noted	No change
31/14	Quantock Hills AONB Service	Para 5.0	The Spatial Vision does not provide a holistic vision for West Somerset. Before breaking the vision down into key headings, it would be good to have an overarching vision that pulls all the elements together.	Not consistent with national policy.	This is the example from Sedgemoor's approved Core Strategy which we consider to be very useful: <i>"By 2026/2027 Sedgemoor will be progressing towards becoming a truly sustainable community consisting of a revitalised Bridgwater that acts as the focal point for the District, supported by thriving and prosperous market towns and key rural settlements where local people can access affordable housing, local employment, and community services. This will be complimented by a living and working countryside that contributes to the overall prosperity and well-being of the District and conserves and enhances its natural beauty. Where growth has occurred the necessary infrastructure has been delivered at the right time and right place to support this".</i>	Noted	No change

Ref. No.	Name of Representer	Policy / matter	Summary of representation	Soundness test cited	Suggested change	WSC comment	Proposed change.
32/1	West Somerset Flood Group	Introduction para. 3.2, Evidence base	The evidence base relating to flooding is out of date, incomplete and flawed. The Local Plan's strategy is based on flood risk information regarding fluvial and sea flooding. Surface water flood risk evidence has been ignored, in particular, the Minehead Surface Water Management Plan. There are many examples of recent flooding events in West Somerset not mentioned in either of the SFRAs carried out.	Not justified.	Improve the evidence base in respect of flood risk.	SFRA levels 2 & 2 are appropriate to their task. The Council participated in the preparation of the Minehead Surface Water Management Plan and used it in the development of the strategy.	No change
32/2	West Somerset Flood Group	SC1 (5)	This provision appears in NPPF para. 103 but is of sufficient importance to be specifically included in this policy.	Not effective.	Add a further clause: "F. It does not increase the flood risk elsewhere.	Disagree, this is part of national policy.	No change
32/3	West Somerset Flood Group	MD1	The requirement: "contribute towards resolving the flood risk issues which affect the settlement including improving the sea defences protecting the eastern end of the town" whilst laudable is too vague. There is no indication as to what is intended and how it would be delivered. The reference to the eastern end of the town is confusing, the Environment Agency have a policy of "do nothing" in that area. Surface water flooding also needs to be taken account of in the area.	None stated		These are detailed development management level issues which in relation to the local plan sites will be managed through the masterplanning process. Appropriate schemes have not been identified by the Environment Agency.	No change
32/4	West Somerset Flood Group	MD2	No details are provided of the flood risk management infrastructure mentioned in the policy, nor who is responsible for providing it. These things must be made more explicit. Sewage and drainage should also be mentioned explicitly. The grounds for the assumption that strategic development will help to minimise the risk from flooding are not set out. The statement that 'the land identified by the policy is unconstrained by specific flooding or landscape designations' is misleading. The runoff from this area flows into the Minehead built up area.	None stated		These are detailed development management level issues which in relation to the local plan sites will be managed through the masterplanning process.	No change
32/5	West Somerset Flood Group	WA1	The requirement that development proposals: "contribute towards resolving the flood risk issues which affect the settlement" is too vague. There is no indication as to what is intended and how it would be delivered.	None stated		These are detailed development management level issues which in relation to the local plan sites will be managed through the masterplanning process.	No change
32/6	West Somerset Flood Group	WA2	No details are provided of the flood risk management infrastructure mentioned in the policy, nor who is responsible for providing it. These things must be made more explicit. Sewage and drainage should also be mentioned explicitly, and if the system is to be upgraded the nature of the works should be specified in the plan. The grounds for the assumption that strategic development will help to minimise the risk from flooding are not set out.	None stated		These are detailed development management level issues which in relation to the local plan sites will be managed through the masterplanning process.	No change
32/7	West Somerset Flood Group	WI1	The requirement that development proposals: "where appropriate, contribute towards resolving the flood risk issues which affect the settlement" is too vague. There is no indication as to what is intended and how it would be delivered and the wording "where appropriate" makes the provision ineffective. "Contribution" in the form of S106 monies is not possible as it cannot be levied for maintenance. Under 'Purpose' a change has been made since previous versions of the Plan to accommodate the Water Framework Directive which has weakened its flood relief provisions. There is no reason why specific flood risk mitigation provisions should not appear alongside the need to protect 'good ecological status'.	Not effective.	The previous wording should be re-instated.	The wording change subject of this representation was made at the behest of the Environment Agency in relation to Water Framework Directive ecological responsibilities. These are detailed development management level issues which in relation to the local plan sites will be managed through the masterplanning process.	No change
32/8	West Somerset Flood Group	WI2	No details are provided of the flood risk management infrastructure mentioned in the policy, nor who is responsible for providing it. These things must be made more explicit. Sewage and drainage should also be mentioned explicitly. The grounds for the assumption that strategic development will help to minimise the risk from flooding are not set out.	None stated		These are detailed development management level issues which in relation to the local plan sites will be managed through the masterplanning process.	No change
32/9	West Somerset Flood Group	LT1	Land in the Minehead element of LT1 would create the same flood risk problems as the MD2 site, the same comments apply. It is not stated how the policy will deliver a new alignment for the B3191.	None stated		These are detailed development management level issues which in relation to the local plan sites will be managed through the masterplanning process, including a potentially realigned B3191.	No change
32/10	West Somerset Flood Group	CC2	The expression "to new and existing development" in the policy is too narrow in scope. The policy's justification states that it applies the flood risk provisions of NPPF para. 100, it does not, given the weaknesses of the Council's level 1 and 2 SFRAs set out above, and that no advice has been taken from the Lead Local Flood Authority.	Not effective	Replace "to new and existing development" with "elsewhere".	The Council participated in the preparation of the MSWMP and is well aware of its content which was used to inform the preparation of the Local Plan. It is accepted that replacing "to new and existing development" with "elsewhere" would make the policy clearer in its meaning.	Replace "to new and existing development" with "elsewhere".
34/11	West Somerset Flood Group	CC3	The superseded document PPS 25 is referred to.	Not consistent with national policy.	This reference should be changed.	This has already been corrected.	No change
32/12	West Somerset Flood Group	CC6	The policy is not clear enough to enforce, for example regarding the nature of required access to watercourses not being described. There is no mention of sewage management which is a key element of protecting the water resource and managing flood risk. The word 'cumulative' in the policy weakens it by narrowing its application, it should be removed. Further detail is needed to make the policy effective.	Not effective	The word "cumulative" should be removed from the policy. Further detail as to how water should be managed in the policy and justification is required.	Whilst the word 'cumulative' was included in order to address the overall impact of successive developments in terms of flood risk, it is accepted that this may be taken to imply that the policy does not apply to a single development affecting flood risk in isolation. The policy does cover both situations but the removal of the word 'cumulative' from the policy may make this clearer.	Delete 'cumulatively' from the policy.

Ref. No.	Name of Representor	Policy / matter	Summary of representation	Soundness test cited	Suggested change	WSC comment	Proposed change.
33/1	The Theatre Trust	CF1	The Plan is not legally compliant because the policy fails to meet the requirement in para. 70 of the NPPF to <i>protect</i> as well as to enhance <i>cultural facilities</i> . The policy should also be renamed " <i>Maximising access to recreation and community facilities</i> ". The following description should also be added: ' <i>community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.</i> '	Not consistent with national policy.	The policy should be amended to read: <i>The provision of new, and improvement of existing, health, sport, recreation and cultural facilities will be supported, where this helps to strengthen and or enhance a balanced range of provision for local communities and visiting tourists.</i> <i>Where a development would result in the loss of recreational or community facilities, equivalent or greater replacement facilities serving the same area must be provided as part of the proposals. either on site or in a nearby location, unless it can be demonstrated there is no longer a community need for the facility.</i> <i>The appropriate provision of formal sports facilities and /or informal public amenity open space / play space will be required as an integral part of new development.</i>	These matters are for detailed development management policy.	No change
34/1	EDF Energy	EN1	This policy is inconsistent with national policy set out in the NPS and NPPF. Local Plan policies cannot set tests which relate to Nationally Significant Infrastructure Projects subject to Development Consent such as Hinkley Point C. The policy is therefore not consistent with national policy and should be deleted. The NPPF states that it does not contain specific policies for NSIPs which are governed through NPS.	Not effective and not consistent with national policy.	The policy should be deleted. The following statement should be added for clarity: NSIPs are subject to a separate planning process within the national planning regime. Therefore, the Local Plan does not set any policies, tests or requirements for the Planning Inspectorate / secretary of State to apply in considering and deciding whether any element of the development comprised in an application for development consent is acceptable, nor the basis on which any such application should be approved. Accordingly, the Local Plan does not have the same status for decision making by the Secretary of State as it does for decisions under the town and Country Planning Act 1990, where the Council is the determining authority.	In clarification, the following text should be added to the purposes: <i>"This policy does not apply to development covered by the NSIP process and to which a DCO applies."</i>	Add purposes: <i>"This policy does not apply to development covered by the NSIP process and to which a DCO applies."</i>
34/2	EDF Energy	EN2	Whilst the policy is not directly addressed to the Hinkley Point site, or any other NSIP, it is not clear what other schemes it might be applied to. This policy is also non-compliant with national policy expressed through the NPS and the NPPF.	Not effective and not consistent with national policy.	If the policy is specifically intended for application to non-NSIP projects then this should be clearly stated, otherwise the policy should be deleted. In the interests of clarity the following statement should be added: NSIPs are subject to a separate planning process within the national planning regime. Therefore, the Local Plan does not set any policies, tests or requirements for the Planning Inspectorate / secretary of State to apply in considering and deciding whether any element of the development comprised in an application for development consent is acceptable, nor the basis on which any such application should be approved. Accordingly, the Local Plan does not have the same status for decision making by the Secretary of State as it does for decisions under the town and Country Planning Act 1990, where the Council is the determining authority.	In clarification, the following text should be added to the purposes: <i>"This policy does not apply to development covered by the NSIP process and to which a DCO applies."</i>	Add purposes: <i>"This policy does not apply to development covered by the NSIP process and to which a DCO applies."</i>
34/3	EDF Energy	Revised Preferred Strategy policy NH7	An amended version of this policy (which is not included in the Publication Draft Local Plan) should be reinstated in order to set out when the Council will consult the Office for Nuclear Regulation concerning planning proposals in the relevant consultation zones around the Hinkley Point power station site. The amended version should include consultation zones which are consistent in their size with the Detailed Emergency Planning Zone and text to make clear the requirement to consult ONR on all planning applications within the inner zone and planning applications for development in the outer zone based on the ONR's defined consultation criteria.	Not effective and not consistent with national policy.	New Policy NH7 should be reinstated with revised inner and outer zones to reflect the ONR's consultation zones and criteria. Supporting text should be added to outline the circumstances where ONR would be consulted on planning applications, making clear that for all planning applications for development within the Inner Zone the ONR would be consulted.	Noted, the position regarding this policy is that the Office for Nuclear Regulation asked the Council to include a policy specifying the scale of various types of development appropriate at various distances from the Hinkley Point power station site. EDF made a technical objection to the policy and advice was sought from ONR as to how to treat the matter. No advice was forthcoming from ONR, and the Council felt it had little choice but to withdraw the draft policy.	No change

34 respondents.

213 responses.