

February 2016

West Somerset Local Plan Examination
Pre-Hearing Statement on behalf of Summerfield
Developments (SW) Ltd - Representor No. 15
Matter 5: Deliverability of sites



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Planning

1.0 Introduction

- 1.1 This pre-hearing statement is submitted on behalf of Summerfield Developments (SW) Ltd. Summerfield Developments (SW) Ltd has submitted duly made representations in response to each of the consultation stages of the draft Plan and welcomes the opportunity to participate in the examination hearings.

2.0 Comments on issues raised by the Inspector

- 2.1 Having regard to the issues raised by the Inspector, the following additional comments are put forward in respect of the proposed strategic sites and early release sites.

SITE MD2

- 2.2 We would be interested to hear the Council's view on the deliverability of this strategic site. Its steep topography is such that the viability of developing it for housing is questionable at best.
- 2.3 We look forward to seeing the Council's evidence on this matter.

SITE WA2

- 2.4 The Council's own evidence in the form of the Landscape Character Assessment of Potential Strategic Locations for development dated May 2014 concludes that the proposed WA2 allocation (sub areas D1 and D2) would have a moderate adverse visual impact, sensitivity and magnitude on a site that also contains a collection of grade II listed buildings (Parsonage Cottage and Farmhouse).
- 2.5 Furthermore, the Council's Historic Environment Issues Paper, compiled in April 2014, states at para 5.7.23,

"The development of the WA2 allocation area will mean that Parsonage Cottage and Farm will become encapsulated by a modern suburban extension to Watchet. This will result in the loss of its semi-rural setting and primary character, attributes which contribute to the significance (evidential heritage value) of the building

[Parsonage Cottage and Farmhouse]. In accordance with qualitative assessment descriptions set out previously, the magnitude of impact upon this heritage asset is considered to be major, thereby resulting in a Moderate/Large significance of effects. In accordance with the National Planning Policy Framework, the impact upon this heritage asset is therefore considered to be substantial.”

- 2.6 In objecting to the allocation, Historic England’s letter of 20 March 2015 states that the allocation of this area would “*destroy the rural setting of most the grade 2 listed building at Parsonage Cottage*”. In speculating whether mitigation could be achieved, it raises serious doubts over the ability of the site to still deliver the 290 dwellings proposed by the Plan.
- 2.7 These considerations strongly suggest that this is not a suitable location for a development of 290 dwellings and that such a scale of development, as envisaged by the Plan, could not be achieved.

SITE WI2

- 2.8 Summerfield Developments (SW) Ltd has made clear in its previous representations its concerns about the process that has led to the Council identifying this land as part of the strategic allocation in Williton. For reasons unbeknown to Summerfield, the Council has persisted in proposing a strategic allocation in the general area of Site WI2, in preference to other more appropriate and less constrained sites, despite having to continually alter the proposals in response to new issues being raised by statutory consultees.
- 2.9 The most recent alteration to the proposal has been necessitated by the Historic Environment Issues Paper which states at para 5.5.6,
- “The northern section of the western WI2 strategic allocation lies adjacent to the Battlegore barrow cemetery. The location (partially on slightly higher ground above the cemetery) combines with the permanence and nature of the proposed development will result in the cemetery effectively becoming ‘sandwiched’ between two areas of modern built environment, thereby removing the current open views*

from the monument to the south and south west. This current sense of openness is considered to be an essential characteristic of the setting of the cemetery, which has already been compromised by the western expansion of the town. The magnitude of impact upon this heritage asset is considered to be Moderate, with the significance of effects therefore being considered Moderate/Large. In accordance with the National Planning Policy Framework, the impact upon this heritage asset is therefore considered to be substantial”.

- 2.10 In objecting to the allocation, Historic England’s’ letter of 20 March 2015 states, *“given that the allocation of the 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”. 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? 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”*
- 2.11 We concur with this view which echoes Summerfield’s, as consistently expressed in its representations, that the strategic site selection process has not been informed by appropriate assessment of suitable evidence.
- 2.12 The Landscape Character Assessment concludes that the proposed W12 allocation to the west of the village (sub area H1a) would have a high adverse visual impact and high adverse magnitude as well as adjoining a Scheduled Ancient Monument (Battlegore). It states,

“The sub area is physically separated from the existing built-up area of the village of Williton due to an area of land that was formerly used as water meadows and for which a network of sluices still exist. The Level 1 Strategic Flood Risk Assessment identified much of this land as being in Flood Zone 3b or, operational flood plain due to its former use. The north eastern part of the Sub-area adjoins an important Scheduled Ancient Monument of Battlegore and the heritage asset study has indicated that any development in this area will have an adverse visual impact on the site and its setting.”

- 2.13 The Landscape Character Assessment concludes that the proposed allocation site has the highest impact of all the sites assessed and even with mitigation the visual impact would be moderate adverse.
- 2.14 We note that Williton Parish Council has stated in its letter of 23 March 2015,
“we are very concerned about divorcing potential development from the village”.
- 2.15 These considerations, and others expressed within Summerfield’s previous representations, together with the proposed deletion of land to the north of Danesfield School, strongly suggest that this is not a suitable location for a development of 406 dwellings and that such a scale of development, as envisaged by the Plan, could not be achieved in a sustainable manner.
- 2.16 We therefore remain of the view that the proposed WI2 strategic allocation is not the most appropriate site when considered against reasonable alternatives and so would fail the justified test of soundness. It is not supported by the available evidence for the reasons set out in our previous representations and those also now set out above.

Liddymore Farm, Watchet

- 2.17 We welcome the identification of this site as a proposed early release site. It is in a suitable location is capable of delivering mixed use development to reflect the aims and objectives of draft local plan
- 2.18 The site was assessed within the Landscape Character Assessment of Potential Strategic Locations for development as having only a low adverse visual impact, sensitivity and magnitude.
- 2.19 The Sustainability Appraisal (SA) acknowledges that in respect of Watchet, the proposed growth to the east and south of the town (including Liddymore Farm) performed similarly in the assessment to the proposed strategic allocation at Parsonage Farm. Although the assessment concludes that *“the Council selected the site to the south as it was felt that it related better to Watchet town centre than the site to the east”*, this is contrary to the Council’s own evidence as both strategic growth areas performed similarly and the same level of mitigation was recommended for each.
- 2.20 We attached a report to our previous representations prepared by FMW Transport consultants which demonstrates that the village centre would very accessible from the site on foot and by bicycle. With our previous representations we also attached reports from EAD ecological consultants confirming that the Liddymore Farm site has no ecological constraints to development.
- 2.21 The suggested yield from the site is said in the proposed changes to the Plan as being at least 100 dwellings. The site has capacity to deliver up to 200 dwellings and, potentially, some commercial uses. In light of the uncertainty over delivery and/or capacity of some of the proposed strategic site allocations, it is certainly not appropriate for the Plan to seek to unduly limit the number of houses that this site could deliver, including potential delivery that can assist with the Council’s five year housing land supply.

2.22 The site is within the control of a developer with a proven track record of delivering housing in West Somerset.

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