

## West Somerset District Council Local Plan Examination

### Matters and Issues Statement made by Savills on behalf of the Trustees of The Wyndham Estate

#### Matter 7: Changes to submitted policies proposed for soundness

1. A number of issues with regard to policy wording have been raised in the representations and, in some cases, by my initial review of the Plan. These were set out in ED3 (paragraphs 38 to 62). Under this matter we will consider the detailed wording of the policies that are proposed to be changed following the Local Development Panel on 25 November 2015 (ED10 Appendix 1). Each policy change will be considered separately.

##### 1.1. SC1: Hierarchy of Settlements

- 1.1.1. The proposed changes; namely the deletion of point 4 which previously conflicted with Framework paragraph 55; and clarifying that policy OC1 will deal with development elsewhere in the open countryside, are supported. The policy wording in SC1 is now considered to be sound.

##### 1.2. WA1: Watchet Development

- 1.2.1. The Wyndham Estate concurs with the Council's view that new development is necessary to strengthen Watchet's role as a service and employment centre, is necessary to strengthen the range of services and facilities and to address the community's infrastructure requirements.
- 1.2.2. The proposed changes; namely the clear reference to Watchet's historic character and heritage assets, are considered to be acceptable and the Estate acknowledges that the historic character and heritage assets contribute to the attractiveness of Watchet as a tourist destination. The policy wording in WA1 is now considered to be sound.

##### 1.3. WA2: Strategic Development Allocation at Parsonage Farm, Watchet

- 1.3.1. The Wyndham Estate continues to strongly support the development allocation at Parsonage Farm and recognises that any development proposal must have regard to the heritage assets and the setting of those heritage assets. The Council has sought to address Historic England's consultation response to the Local Plan, however the Estate is disappointed that it was not able to contribute to the discussions about the heritage impact on the allocation that appear to have taken place between March and November 2015.
- 1.3.2. The proposed changes to WA2 include the term 'historic assets' but the Estate makes the assumption that the Council intended to refer to 'heritage assets' and suggests that this wording is amended accordingly. The Heritage Assessment of Parsonage Farmhouse provided by Wessex Archaeology is referred to as the 'Historic Asset Impact Assessment'; the Estate suggests that, for clarity, this policy wording is amended.
- 1.3.3. Some of the 'measures' in the Heritage Assessment to which the wording of WA2 makes reference are considered to be somewhat prescriptive and use the word 'development' to imply that land is to be used for built forms such as houses and employment buildings. Figure 4

(Potential mitigation measures) in the Heritage Assessment proposes that the field within the allocated site that lies immediately north of the farm complex should be left undeveloped. A literal interpretation of Figure 4 could be that this part of the current allocation should lie outside of any future red line boundary, however the Estate is strongly of the view that the exclusion of this land would preclude its use for an alternative form of development such as community open space or a landscaped area, which could have a positive effect on the setting of the heritage assets. This is particularly relevant given that there is no change to the expectation that the site will deliver approximately 290 houses along with employment space and allotments; a reduction in the developable area within the allocation is likely to constrain the development capacity of the site.

- 1.3.4. Measures to prevent harm to the significance of the heritage assets at Parsonage Farm, and their setting, would include careful masterplanning of any future scheme at the site by the Estate, in consultation with Historic England, to ensure that any development conformed to Policy WA2.

#### **1.4. WI2: Key Strategic Development Allocations at Williton**

- 1.4.1. The Wyndham Estate remains supportive of the Council's proposal to allocate land to the west and to the north of Williton for strategic development. However the Estate is disappointed that it was not able to contribute to the discussions about the heritage impact on the allocations that appear to have taken place between March and November 2015. Evidently the Council has made changes to the allocations at Williton but has not commented on whether the deletion of the allocation north of Danesfield School can be compensated by achieving higher development densities at the remaining allocations to the west and north of Williton. The target of delivering approximately 406 houses remains unchanged.
- 1.4.2. The Estate considers that the proposed 'Battlegore archaeological protection and green buffer area' shown on the Williton Key Strategic Sites Amendment Plan could be misinterpreted as a constraint to the development of the allocation immediately to the west. The Estate accepts the rationale for the proposed changes to the wording of WI2, informed by correspondence between the Council and Historic England, but considers that there is a divergence between the aspiration to 'enhance' the Battlegore heritage assets and the aspiration to protect and indeed keep development away from the heritage assets.
- 1.4.3. In previous representations on the Local Plan the Estate has explained that the significant amount of land to the west and north of Williton within its ownership should be viewed by the Council as a positive attribute. Rather than treat the heritage assets as a constraint the Estate considers that there is an opportunity to plan positively and to achieve a masterplan for the areas to the west and north of Williton that integrates a landscape, appropriate infrastructure, heritage assets and housing. There exists the opportunity for strong linkages in the form of both sustainable transport and green infrastructure between the existing settlement and the large allocation to the west, but these are not apparent in the policy wording or in the Amendment Plan.
- 1.4.4. There is not any clear reasoning for the proposed deletion of the site allocation to the north of Danesfield School: the area could indeed be developed if this is undertaken sensitively and respects the heritage assets. The Estate would wish to explore this with Historic England rather than see the area rejected out of hand. The Key Strategic Sites Amendment Plan, showing the deletion of the site allocation to the north of Danesfield School is not justified; particularly as it limits the opportunity for 'an enhancement of the designated heritage asset' which is one of the objectives included in the revised amended policy wording. The apparent divergence between the policy wording and the Amendment Plan is not justified and serves to limit the effectiveness of the policy. Accordingly the Estate considers that policy WI2 is not

sound, but that this could be overcome by taking a more positive approach to the ability of the allocated sites to achieve the desired enhancements.

### **1.5. NH1: Historic Environment**

1.5.1. The Wyndham Estate supports the amended wording of NH1, particularly the acknowledgement within point 1 that the interest and significance of heritage assets, their setting and the historic environment should be aligned with the extent to which development proposals are expected to conserve and/or enhance the historic environment. The policy wording in NH1 is now considered to be sound.