

Programme Officer

From: Programme Officer
Sent: 05 April 2016 09:21
To: Martin Wilsher; Nick Bryant; Toby Clempson
Subject: further info needed

Dear Martin, Nick & Toby

See below email from the Inspector:

Following the hearing session into Matter 8 and your Further Response Document (ED58) I would be grateful if you could consider and address the following issues in reporting to Full Council on the way forward.

1. The Council should deal with the issue raised by Stogumber PC in respect of policy SC1 concerning the number shown and what it relates to. The point being made is that the number relates to the parish in most cases rather than the village which is what the text says.
2. In Appendix B of ED58, it will be necessary to consider five year supply now, ie. at April 2016. Is it possible to say anything about completions in 2015/16? If not, I suggest that the assumed completion rate of 141 shown in ED34/4, Appendix 4a is used unless there is very clear evidence now available for a different figure. Taking this figure and moving Appendix B on a year gives, on my calculation, a requirement of 790 at 5% and 903 at 20%. This is because, although the shortfall against the stepped requirement is less, there are now only 2 years at 122.5 dpa and 3 years at 155 dpa.
3. Looking at the 'Plan Supply' there was some confusion at the hearing session over the derivation of some of these figures. It will be necessary to explain what assumptions have been made for potential completions on large and small windfall sites, on those with planning permission now, on the early release sites and on any of those put forward by others that the Council considers may be in accordance with the Plan strategy and policy SC1. On the evidence this would appear to at least include the two sites to the east of Watchet and that to the east of Williton. The Council will need to ensure that there is no double counting of potential completions on large windfall sites and others that could come forward in that size category.
4. Having considered the evidence so far submitted and without prejudice to any further comments that may be made once the Main Modifications are published for consultation, I see no justification for changing the allocated site at Williton as proposed in ED17. In other words, the site should be shown as in the submitted Plan with the master planning process explained by The Trustees addressing the issues of flood risk and heritage.
5. Following on from that, at the Matter 8 hearing session I expressed some concern at the policy suggestions made by Historic England since some did not appear to accord with the Framework. The approach being advocated is to set out the strategic framework in NH1 and add 'heritage' clauses to various other policies. However, the wording of NH1 seems inappropriate in some respects that were pointed out during the session while that in the added clauses does not always appear consistent. This needs to be discussed again with Historic England, notwithstanding the agreed position (ED57).

As a general rule, changes which alter policy wording must be Main Modifications, even where it is a matter of correcting errors or improving clarity. Changes to the justification may be Main Modifications depending on the circumstances. Those essential to the application of the policy would be while those that simply add a further reference document would not, in my view. It may be helpful if the Council provided me with a draft of the Main Modifications before they go

before Full Council in order for me to make any comments which may be helpful. As with this email, they would need to be placed on the Examination web site for information. Once Full Council has agreed the Main Modifications that it would like to see made to the Plan, the Council will need to consider when it would be appropriate to make the request under s20(7C) of the 2004 Act.

Regards,

Salla

Salla Arnold
Programme Officer