



Intelligent Plans
and examinations

Report on Wincanton Neighbourhood Plan 2017-2028

An Examination undertaken for South Somerset District Council with the support of the Wincanton Town Council on the April 2017 submission version of the Plan.

Independent Examiner: Jill Kingaby BSc(Econ) MSc MRTPI

Date of Report: 3 November 2017

Intelligent Plans and Examinations (IPE) Ltd, Regency Offices, 37 Gay Street, Bath BA1 2NT

Registered in England and Wales. Company Reg. No. 10100118. VAT Reg. No. 237 7641 84

Contents

	Page
Main Findings - Executive Summary	3
1. Introduction and Background	3
• Wincanton Neighbourhood Plan 2017 – 2028	3
• The Independent Examiner	4
• The Scope of the Examination	4
• The Basic Conditions	5
2. Approach to the Examination	6
• Planning Policy Context	6
• Submitted Documents	6
• Site Visit	7
• Written Representations with or without Public Hearing	7
• Modifications	7
3. Procedural Compliance and Human Rights	7
• Qualifying Body and Neighbourhood Plan Area	7
• Plan Period	8
• Neighbourhood Plan Preparation and Consultation	8
• Development and Use of Land	9
• Excluded Development	9
• Human Rights	9
4. Compliance with the Basic Conditions	9
• EU Obligations	9
• Main Issues	9
• Overview	10
• Issue 1: Housing	11
• Issue 2: The Economy	16
• Issue 3: The Environment	19
5. Conclusions	22
• Summary	22
• The Referendum and its Area	23
Appendix: Modifications	24

Main Findings - Executive Summary

From my examination of the Wincanton Neighbourhood Plan (the Plan / the NP) and its supporting documentation including the representations made, I have concluded that subject to the policy modifications set out in this report, the Plan meets the Basic Conditions.

I have also concluded that:

- The Plan has been prepared and submitted for examination by a qualifying body – the Wincanton Town Council;
- The Plan has been prepared for an area properly designated – the Parish of Wincanton shown on the map on Page 6;
- The Plan specifies the period to which it is to take effect – 2017-2028; and
- The policies relate to the development and use of land for a designated neighbourhood area.

I recommend that the Plan, once modified, proceeds to Referendum on the basis that it has met all the relevant legal requirements.

I have considered whether the referendum area should extend beyond the designated area to which the Plan relates and have concluded that it should not.

1. Introduction and Background

Wincanton Neighbourhood Plan 2017 - 2028

- 1.1 Wincanton is located in the south-east of the County of Somerset and South Somerset District, close to the border with Dorset and Wiltshire. The Neighbourhood Plan Area is the Parish of Wincanton which is bisected by the A303 trunk road. Wincanton Town is situated north of this major road linking London to the South West of England, and the southern part of the Parish is rural in character. The Town dates back to Saxon times and its location on the principal medieval coach route from London to Exeter enabled its economic growth, with cloth manufacturing, clock making and the dairy industry from the Middle Ages onwards. An area around the town centre is designated as a Conservation Area to preserve and enhance its historic character.
- 1.2 Wincanton is some 16 miles from Yeovil and is identified as one of four primary market towns in the South Somerset Local Plan, which are placed below Yeovil in the settlement hierarchy¹. Wincanton serves the needs of the surrounding rural area, having a range of shops, a health centre,

¹ Policy SS1 of the South Somerset Local Plan 2006-2028, adopted in 2015.

Intelligent Plans and Examinations (IPE) Ltd, Regency Offices, 37 Gay Street, Bath BA1 2NT

Registered in England and Wales. Company Reg. No. 10100118. VAT Reg. No. 237 7641 84

hospital, leisure centre, primary and secondary schools and other facilities. As Page 1 of the NP states, Wincanton has experienced the construction of some 600 new homes since 2006, and another 270 homes have planning permission. Much of the new development has occurred to the south-west of the Town.

- 1.3 The Town Council decided in May 2013 to produce a Neighbourhood Plan, having produced a Community Plan in 2007 supported by the Market & Coastal Towns initiative, with an updated survey in 2012. After designation of the NP area, a Steering group was formed and work on the Plan began in January 2015. Concern over significant new housebuilding in the Town from 2006 onwards and the impact on local services, the environment and character of the community stimulated an interest in producing a Neighbourhood Plan. Consultation activities including a survey of local businesses began in Spring 2015.

The Independent Examiner

- 1.4 As the Plan has now reached the examination stage, I have been appointed as the examiner of the Wincanton Neighbourhood Plan by South Somerset District Council (SSDC), with the agreement of the Wincanton Town Council.
- 1.5 I am a chartered town planner and former government Planning Inspector, with previous experience examining Neighbourhood Plans. I am an independent examiner, and do not have an interest in any of the land that may be affected by the draft plan.

The Scope of the Examination

- 1.6 As the independent examiner I am required to produce this report and recommend either:
- (a) that the NP is submitted to a referendum without changes; or
 - (b) that modifications are made and that the modified NP is submitted to a referendum; or
 - (c) that the NP does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.
- 1.7 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended)('the 1990 Act'). The examiner must consider:
- Whether the Plan meets the Basic Conditions;

- Whether the Plan complies with provisions under s.38A and s.38B of the Planning and Compulsory Purchase Act 2004 (as amended) ('the 2004 Act'). These are:
 - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the Local Planning Authority;
 - it sets out policies in relation to the development and use of land;
 - it specifies the period during which it has effect;
 - it does not include provisions and policies for 'excluded development';
 - it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area;
 - whether the referendum boundary should be extended beyond the designated area, should the Plan proceed to referendum; and
- Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 (as amended)('the 2012 Regulations').

1.8 I have considered only matters that fall within Paragraph 8(1) of Schedule 4B to the 1990 Act, with one exception. That is the requirement that the Plan is compatible with the Human Rights Convention.

The Basic Conditions

- 1.9 The 'Basic Conditions' are set out in Paragraph 8(2) of Schedule 4B to the 1990Act. In order to meet the Basic Conditions, the NP must:
- Have regard to national policies and advice contained in guidance issued by the Secretary of State;
 - Contribute to the achievement of sustainable development;
 - Be in general conformity with the strategic policies of the development plan for the area;
 - Be compatible with and not breach European Union (EU) obligations; and
 - Meet prescribed conditions and comply with prescribed matters.

- 1.10 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that the neighbourhood plan should not be likely to have a significant effect on a European Site (as defined in the Conservation of Habitats and Species Regulations 2012) or a European Offshore Marine Site (as defined in the Offshore Marine Conservation (Natural Habitats etc.) Regulations 2007), either alone or in combination with other plans or projects.

2. Approach to the Examination

Planning Policy Context

- 2.1 The Development Plan for this part of South Somerset District, not including documents relating to excluded minerals and waste development, is the South Somerset Local Plan 2006-28 adopted in 2015, with 3 saved policies from the South Somerset Local Plan 1991-2011. As the Basic Conditions Report for this NP observes, the saved (old) Local Plan policies are not strategic in nature and are not therefore significant for the examination of this NP. A review of the Local Plan by SSDC is underway but is at an early stage, and a draft Plan has not yet been published. The NP Steering Group has however had regard for some key evidence documents².
- 2.2 The planning policy for England is set out principally in the National Planning Policy Framework (NPPF). The Planning Practice Guidance (PPG) offers guidance on how this policy should be implemented. Paragraph 184 of the NPPF confirms that neighbourhood plans must be in general conformity with the strategic policies of the Local Plan, reflecting these policies and planning positively to support them. Paragraph 185 states that, outside the strategic policies, neighbourhood plans are able to shape and direct sustainable development in their area.

Submitted Documents

- 2.3 I have considered all policy, guidance and other reference documents I consider relevant to the examination, including those submitted which comprise:
- the draft Wincanton Neighbourhood Plan 2017-2028, April 2017;
 - the Map on Page 6 of the Plan which identifies the area to which the proposed NP relates;
 - the Consultation Statement, April 2017;
 - the Basic Conditions Report, April 2017;
 - all the representations that have been made in accordance with the Regulation 16 consultation;

² The Basic Conditions Report refers to the Strategic Housing Market Assessment, Land Availability Assessment and Employment Monitoring Report.

- the Strategic Environmental Assessment and Habitats Regulations Screening Report prepared on behalf of Wincanton Town Council, April 2016;
- the Strategic Environmental Assessment and Habitats Regulations Screening Report Addendum prepared by SSDC, February 2017; and
- the Town Council's response (15 September 2017) to my questions set out in my letter of 30 August 2017³.

Site Visit

- 2.4 I made an unaccompanied site visit to the Neighbourhood Plan Area on 12 September 2017 to familiarise myself with Wincanton, and visit relevant sites and areas referenced in the Plan and evidential documents.

Written Representations with or without Public Hearing

- 2.5 This examination has been dealt with by written representations. The consultation responses set out a number of objections and reservations which various parties had to the submitted NP. The Town Council, in response to my letter of 30 August 2017, provided additional information on a number of the issues raised by the consultation responses. With this additional evidence, I considered hearing sessions to be unnecessary as the written material gave me a satisfactory understanding of all views regarding the NP.

Modifications

- 2.6 Where necessary, I have recommended modifications to the Plan (**PMs**) in this report in order that it meets the Basic Conditions and other legal requirements. For ease of reference, I have listed these modifications separately in the Appendix.

3. Procedural Compliance and Human Rights

Qualifying Body and Neighbourhood Plan Area

- 3.1 The Wincanton Neighbourhood Plan has been prepared and submitted for examination by Wincanton Town Council which is a qualifying body for an area that was designated by SSDC on 6 March 2014.
- 3.2 It is the only NP for the Parish of Wincanton, and does not relate to land outside the designated neighbourhood area. The Neighbourhood Plan Area is illustrated on Page 6 in the map entitled "Fig. 1 Area context". I

³ View at: <https://www.southsomerset.gov.uk/planning-and-building-control/planning-policy/neighbourhood-plans/neighbourhood-area-designations/wincanton-neighbourhood-area-designation/>

consider that it would be clearer for readers (including decision makers) if a key was added to this map stating that the Parish of Wincanton, delineated by a red boundary, is the NP area⁴. **PM1** should be made to secure this.

Plan Period

- 3.3 The Plan specifies clearly the period to which it is to take effect, which is from 2017 to 2028. This aligns with the end date of the adopted South Somerset Local Plan, which also runs to 2028.

Neighbourhood Plan Preparation and Consultation

- 3.4 Following formation of the Steering Group, work began to prepare the Wincanton NP in January 2015 with the creation of a dedicated website by the Town Council, and a business survey. Some 200 local businesses were contacted, a feedback meeting was held and a press release was made in the Western Gazette in Spring 2015. A community drop-in consultation event, leaflets hand-delivered to all households, further press releases, promotion on the Town Council's website and social media channels, as well as contact with businesses and landowners, were all carried out in June 2015.
- 3.5 The results of early consultation were published in October 2015. Additional work including a request for valued green spaces to be identified, the publication of Plan Objectives, and a Place Check exercise were subsequently undertaken. In July 2016, a draft NP was discussed with SSDC's Spatial Policy Department, prior to public consultation under Regulation 14 of the 2012 Regulations. This consultation exercise used a number of methods to contact local people, businesses, landowners, voluntary groups, neighbouring parish councils and statutory consultees. Consultation took place between 2 November and 21 December 2016. Further details of the consultation process are contained in the Consultation Statement, April 2017, received by SSDC on 15 May 2017.
- 3.6 Twelve responses were received at Regulation 14 stage, and these were used to make amendments to the NP prior to its submission to SSDC in April 2017. Consultation under Regulation 16 was carried out between 15 June and 27 July 2017, which elicited 8 responses. I have had regard for these responses in my examination of the NP. I am satisfied that the consultation process has met the legal requirements and had regard to the advice contained in the PPG concerning the preparation and engagement on a neighbourhood plan.

⁴The NP should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. See PPG Reference ID: 41-041-20140306.

Development and Use of Land

- 3.7 The Plan sets out policies in relation to the development and use of land in accordance with s.38A of the 2004 Act.

Excluded Development

- 3.8 The Plan does not include provisions and policies for 'excluded development'. In response to a comment made by Somerset County Council, I confirm (see paragraph 4.13 below) that mineral extraction and waste development are not matters for this NP.

Human Rights

- 3.9 SSDC is satisfied that the Plan does not breach Human Rights (within the meaning of the Human Rights Act 1998)⁵, and from my independent assessment I see no reason to disagree.

4. Compliance with the Basic Conditions

EU Obligations

- 4.1 The Wincanton NP was screened for Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA) in April 2016⁶. This found that there were unlikely to be any significant environmental effects resulting from the NP. An update of the assessments was undertaken by SSDC in early 2017 when the Plan was revised⁷, which confirmed that it was unnecessary to undertake SEA or HRA. I note that Natural England agreed with this position. Having read both documents, and noting that the NP does not include site allocations for development, I support the District Council's conclusion.

Main Issues

- 4.2 Having regard for the Wincanton NP, the consultation responses, written evidence and the site visit, I consider that there are three main issues for this examination. These are whether the Plan meets the Basic Conditions in respect of:

⁵ E-mail of 8 September 2017 from SSDC Spatial Planning in response to Examiner's questions.

⁶ Strategic Environmental Assessment and Habitats Regulations Assessment Screening Report, prepared on behalf of Wincanton Town Council, April 2016 (Post Statutory Consultation).

⁷ Strategic Environmental Assessment and Habitats Regulations Assessment Screening Report Addendum February 2017, South Somerset District Council.

- Housing - Policies 1-6 address the identification of suitable locations for future housing development and Policies 7-10 concern types of housing (Issue 1);
- The Economy - Policies 11-13 relate to sustainable locations for future employment sites and Section 8 addresses enhancement of the town centre economy (Issue 2); and
- The Environment - Policies 1-6 relate to good design in new development which is compatible with the character of the surrounding area, conserving the natural and historic environments; and Section 9 contains Policies 14 and 15 which concern protection of public open space and improvements to walking and cycling routes (Issue 3).

Overview

- 4.3 The Wincanton NP is a concise document with a logical structure, and it is commendably easy to read. It sets out a clear vision and objectives and, as stated on Page 1, *“takes a realistic and positive approach to where future development should take place”*. Section 2 of the Plan briefly summarises the requirements of national and local planning policies, drawing attention to the South Somerset Local Plan which was adopted in March 2015. SSDC stated that it would be useful to include reference to relevant Local Plan Policies ie. Policies SS1, SS3 and SS5.
- 4.4 The NP should be in general conformity with these key policies, and I shall be assessing this requirement when considering the three main issues. The Town Council stated that it does not wish to refer to the policies specifically because the Local Plan is being reviewed, and this is likely to lead to changes. However, the NP recognises that the current review is unlikely to result in a new adopted Local Plan before 2020, so that Policies SS1, SS3 and SS5 will be strategically important for some time. On balance, I accept that the NP need not make direct reference to these specific policies in Section 2 in order to meet the Basic Conditions.
- 4.5 Section 3 of the NP refers to Wincanton’s geographical position at the south eastern corner of Somerset, and its historical significance on the main Exeter to London medieval coach route. There is a cross-reference to the Local Plan’s brief overview of the town’s history at the top of Page 6 of the NP, and paragraph 7.85 of the Local Plan includes a Spatial Portrait of Wincanton with additional information about Wincanton’s context and character. The NP preparation process is summarised in its section 4, with a reference to the Consultation Statement. Issues for the town and objectives for the NP, for the Town Council in its wider role, and a Vision for Wincanton in 2028, follow in section 5. SSDC queried whether the organisations listed in the table in 5.3 of the NP were in agreement with the Plan’s aims, and whether other bodies should be named. However, the table is headed *“Bodies that could be involved ...”* (my emphasis) and

none of the organisations have objected to being named. I am satisfied that Sections 3-5 provide a helpful starting-point for the following sections which contain related NP policies and proposals.

- 4.6 Section 10 at the end of the NP addresses the topic of monitoring and reviewing the Plan. Challenges for the area and concerns of the local community will change over time, and the Plan should be monitored even though it may not always be possible to predict the long-term direction of change. This last section of the Plan commits to a review of the NP every five years as well as annual monitoring work, with alterations⁸ or a new Plan if the current one is shown to be unfit for purpose. This is good planning practice which should contribute to the achievement of sustainable development. I firmly support section 10.

Issue 1 – Housing

- 4.7 Page 1 of the NP refers to a recent significant period of housebuilding in Wincanton with 594 new dwellings built since 2006, and an additional 270 dwellings with planning permission. The South Somerset Local Plan's Policy SS1 sets out a settlement hierarchy with Yeovil as the prime focus for development in South Somerset. The Primary Market Towns, including Wincanton, should provide for development, including housing, to increase their self-containment and enhance their roles as service centres. Policy SS5 and Table 2 in the Local Plan show a "housing requirement" for 703 new dwellings in Wincanton over the plan period to 2028, which is lower than the 864 dwellings already completed or with planning permission. Paragraph 7.94 of the Local Plan observes that Wincanton is different from the other Market Towns because of the high level of commitments compared to the overall housing requirement considered appropriate for the settlement. It indicates that the latter years of the Local Plan are expected to experience limited levels of housing provision in Wincanton, which should enable a period of assimilation of the recent/current housing growth.
- 4.8 The Local Plan (paragraph 7.95) envisages that the ongoing monitoring process and an early review of the Local Plan would enable the housing provision of Wincanton to be supplemented, should the local housing market underpinned by employment growth require it. The first paragraph in section 6 of the NP describes how planning applications for housing development in locations like Wincanton may be permitted where a local planning authority is unable to demonstrate a 5 year housing land supply. SSDC referred to the changed position regarding the importance of 5 year land supply following the Ministerial Statement in December

⁸It is notable in this context that Section 4 of the Neighbourhood Planning Act 2017 provides new provisions (once commenced) to make the review of a made neighbourhood plan a much less onerous process.

2016⁹. This would mean that policies for the supply of housing land in a Neighbourhood Plan would not be considered out-of-date if the local planning authority could demonstrate a 3 year supply of deliverable housing sites.

- 4.9 However, national planning policy is currently undergoing a review with the publication of the Housing White Paper on 7 February 2017¹⁰. Government aims to introduce a new standardised methodology to simplify the process for assessing local housing need and the more recent publication on 14 September 2017 of the consultation document, 'Planning for the right homes in the right places: consultation proposals', contains amongst other things, the new proposed methodology for assessing local housing need¹¹. This will be included in a revised NPPF, which it is anticipated will come into force in Spring 2018. In view of the forthcoming changes to housing need assessment in the NPPF, I consider that textual change to the first paragraph in section 6 would assist readers, and ensure that the NP has regard for pending changes to national planning policy, whatever final form they may take. Proposed modification **PM2** would achieve this.
- 4.10 The Wincanton NP does not identify or allocate sites for housing development, but it has been based on an examination of sites which may come forward for consideration in future¹². Section 6.1 of the NP includes descriptions of the various broad areas in and around the town. Regarding the 'South West of the Town', the Abbey Manor Group Ltd queried the retention of land at Lawrence Hill as informal open space. Although part of the land includes a public footpath, it is in different ownership from the proposed development land to the east, so that its retention as informal open space could not be secured by a development agreement. I consider that the last sentence of the second paragraph should be modified as shown in **PM3** to state that Lawrence Hill should remain undeveloped. It is unnecessary in my view to comment on unspecified, further development of the Town to the south-west at this stage.
- 4.11 The final paragraph concerning the 'South West of the Town' states that a site for a seven class primary school requiring 1.1 hectares of flat land would be needed. Somerset County Council's School Place Planning Infrastructure Growth Plan 2017 suggests that the NP is out-of-date. The s.106 obligation accompanying the planning permission for the New Barns

⁹ View at: <http://www.parliament.uk/business/publications/written-questions-answers-statements/written-statement/Commons/2016-12-12/HCWS346>

¹⁰ View at: <https://www.gov.uk/government/collections/housing-white-paper>

¹¹ View at: <https://www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-places-consultation-proposals>

¹² Wincanton PlaceCheck Report, Wincanton Town Council, March 2016.

Farm (The Chase) included a contribution for a new school. However, negotiations completed in 2016 enabled a swap of the proposed school site for land adjoining Wincanton Primary School. This should enable the existing school to expand, and it is expected to become a 14 class school from November 2017¹³. The text in paragraph 6.1 on Page 12 of the NP should be corrected¹⁴ so that it reflects the most recent position. **PM4** should be made so that the Plan does not hold back sustainable development. I have also considered the suggestion that Page 12 should refer to the possible inclusion of land for parking for the Primary School within any redevelopment scheme of the Tythings site. However, the Town Council advises that it has not been investigated through the NP's preparation, or discussed with the landowner. I accept that any future proposal need not be specifically referenced in the NP.

- 4.12 The Main Findings on Page 14 of the NP conclude that "*there appear to be potential opportunities for further housing development that would be well-related to the town...*". In my opinion, the NP should contribute to sustainable development since it does not take an overly protective approach and allows for the possibility of some new housing. The NP has had proper regard for the NPPF with its presumption in favour of sustainable development and its aim to boost significantly the supply of housing. The overall approach is in general conformity with the strategic policies for housing, notably SS1: Settlement hierarchy and SS5: Delivering new housing growth, in the Local Plan.
- 4.13 Policies 1-6 set out a number of environmental considerations which prospective developers should consider when making development proposals. I discuss the wording of the policies in more detail under Issue 3 below. Reference is made to existing stone buildings at New Barns and the stone wall on the edge of the Tythings in Policy 2 and the preceding text, but it would be inappropriate for the NP to undertake research into the supply of local stone (presumably for new buildings), as suggested by the County Council. Mineral extraction and waste development are defined as excluded development in s.61K of the 1990 Act and should not be addressed in the NP.
- 4.14 It was suggested that Policy 2 should include a reference to viability. The NPPF, paragraph 173, cautions that pursuing development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable and sites for development should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. Policies 1-6 are setting out general

¹³ Somerset County Council: School place planning infrastructure growth plan, 2017, including Wincanton School Organisation Plan Area.

¹⁴ Paragraph 10(3)(e) of Schedule 4B to the 1990 Act provides for the recommending of modifications for the purpose of correcting errors.

principles rather than setting the requirements for specific sites, and Policy 2 is supporting rather than insisting on the re-use of existing buildings at New Barns Farm. In these circumstances, I consider it unnecessary to refer to viability in Policy 2. However, additional text at the top of Page 15 following the 'Main Findings' should be made having regard for the NPPF and the achievement of sustainable development. **PM6** should be made accordingly.

- 4.15 Section 6.2 of the NP concerns 'Housing suitable for Wincanton's population'. I agree with the District Council that a reference to data sources should be added here. A footnote on Page 18 with a link to the background papers, rather than added appendices, would be sufficient. **PM9** should be made to assist readers and help to secure sustainable development.
- 4.16 Policy 7: Housing Types was criticised as being overly restrictive and not providing for 4 bed dwellings. However, as the Town Council pointed out, the policy is addressing open market housing, and I note that the requirement for 1, 2 and 3 bedroom homes is caveated by "*unless there are demonstrable reasons why this is not possible or desirable*". From my site visit, I observed that there are already many substantial dwellings in Wincanton, likely to provide 4 or more bedrooms. In addition, Wincanton is already committed to providing in excess of 700 new dwellings to meet its estimated requirements to 2028. The NP should therefore be entitled to focus new development on the market for smaller dwellings, having regard for the predicted growth in the ageing population. The supporting text on Page 16 acknowledges that studio and 1 bedroom properties have not sold easily in the private market, but indicates that many such homes do not meet the national standards for room sizes. It suggests that innovative solutions are needed to provide suitable, popular configurations for 1 and 2 bedroom homes. I support this approach and consider that Policy 7 is in general conformity with Policy HG5: Achieving a mix of market housing, as well as the achievement of sustainable development. Additional guidance on possible design solutions is not necessary.
- 4.17 Objections to Policy 8: Starter homes for local people in the NP were raised by SSDC. It pointed out that its Strategic Housing Market Assessment October 2016 had raised issues around the affordability of providing 20% of housing as starter homes. Also, the Government's Housing White Paper 2017¹⁵ states in its paragraph 4.16 "*We have listened to concerns that our original plans for a mandatory requirement of 20% starter homes over a certain size will impact on other affordable homes*". It goes on to state that the mandatory requirement is likely to be dropped.

¹⁵ See footnote 10.

- 4.18 The Local Plan includes Policy HG3 and HG4 on affordable housing and HG5 on achieving a mix of market housing. However, it is quiet on the subject of starter homes. Although the Housing White Paper indicates that the Government will drop the 20% mandatory requirement, it remains committed to support the aspiration of young people to become home owners and supports the provision of discounted starter homes. It states "*We want local authorities to deliver starter homes as part of a mixed package of affordable housing that can respond to local needs and local markets ...*". In light of the current uncertainty in national and local planning policy, I appreciate the difficulty in formulating an effective policy in the NP. Although objectors argued that Policy 8 should be deleted, I consider that it reflects local aspirations and a serious problem, and should be retained.
- 4.19 The Town Council has provided additional information as to what is meant by "households with a local connection", and I consider that the criteria could usefully be added to the Plan. I agree with the Abbey Manor Group Limited that assessments of eligibility for affordable housing and scheme viability would be best made by the District Council. However, if Policy 8 and the supporting text is modified as shown in **PM9**, fair assessments of eligibility and viability should not be compromised. The modified policy and text will have regard for national policy and secure general compliance with the Local Plan.
- 4.20 Policy 9 is supportive of accessible and adaptable homes, and does not specifically require compliance with the Buildings Regulations. I consider that its inclusion in the NP does not breach the Basic Conditions, but accept that adding a reference to feasibility and viability, especially as the terrain of Wincanton is steep in places, would be helpful. **PM10** should be made so that regard is had for paragraph 173 of the NPPF.
- 4.21 There is concern that Policy 10: Custom and Self-Build Homes, could deter developers who are required to provide affordable and general needs market housing, delay delivery because of the marketing period, and affect scheme viability. It might be better, it is suggested, to encourage informal marketing at a pre-application stage and appraise potential self-builders of the costs and other requirements of development. The District Council proposed that early engagement with the local planning authority in relation to registered and funded self-builders might be preferable. I have seen no clear evidence for the threshold of 30 dwellings given in the policy. Whilst the NPPF paragraph 50 supports the principle of providing a mix of housing including for people wishing to build their own homes, I consider that Policy 10 could have a harmful impact on overall housing delivery and be detrimental to the achievement of sustainable development. The second paragraph of the policy should be deleted and

supporting text modified as shown in **PM11**, so that the Basic Conditions are satisfied.

- 4.22 On the first issue, providing all the above modifications are made, I conclude that Policies 1-6, addressing the identification of suitable locations for future housing development, and Policies 7-10 concerning types of housing will be in general conformity with the South Somerset Local Plan, will have regard for national planning policy and will contribute to the achievement of sustainable development.

Issue 2 - The Economy

- 4.23 Section 7 - Employment begins with two objectives and a vision which seek to encourage suitable business development in Wincanton. The Plan goes on to state that the latest employment monitoring report for South Somerset (2016) shows that the development of employment land and floorspace in Wincanton and other towns has been behind the anticipated delivery rate. Policy SS3 of the Local Plan identified an employment land requirement of 7.94 hectares in the period 2006-28 for Wincanton, of which some 3.56 hectares had been provided or was committed. The Local Plan identified a direction of growth to the south-west of the town for additional employment land, but the NP on Page 20 observed that as yet (in 2015) no detailed plans for development there had been made.
- 4.24 The NP describes three main employment sites in the town, all of which are located in the south-west. It is explained that parts of these sites are not particularly well suited to potential businesses, so Policy 11 has been inserted to guide the release of employment land where alternative uses may offer a better long-term solution. Policy 11 is criticised by SSDC because it omits reference to B1 uses (offices), it is unclear to which area the policy applies, and it departs from Policy EP3 – Safeguarding Employment Land - in the Local Plan. I consider that the policy is loosely worded and is different from Policy EP3 of the Local Plan, which seeks to retain locally accessible employment sites and requires marketing for 18 months before employment land can be released. I agree that there is some uncertainty as to where Policy 11 should apply, in the absence of a map or illustration within the NP showing 'the town's development area'.
- 4.25 Paragraph 22 of the NPPF advises that the long term protection of sites allocated for employment use should be avoided where there is no reasonable prospect of them being taken up for that purpose. However, I consider that existing employment land should not be converted to other uses without proper scrutiny of its ability to meet the longer term needs of the local economy, and promote sustainable development. It seems to me that Policy EP3 of the Local Plan should enable potentially redundant sites to be assessed satisfactorily for future employment use.

Regrettably, I conclude that Policy 11 should be deleted from the NP as it is not in general conformity with the Local Plan. In addition, the supporting text on Page 20 should be amended to explain that Policy EP3 will be applied, and to clarify that the direction of growth to the south-west of the Town is included in the Local Plan. SSDC criticised use of the phrase "other uses typically found on large industrial estates", but I consider that the alternative "other economic development uses" is equally broad, and an amendment is therefore unnecessary. However, **PM12** to delete Policy 11 and modify the supporting text should be made to meet the Basic Conditions.

- 4.26 Policy 12 supports new proposals for employment development, and its thrust has regard for section 1 of the NPPF, Building a strong, competitive economy. However, SSDC objected that the policy was not sufficiently precise, and did not take account of evidence from its own Economic Development Monitoring Report (April 2017) and other studies, which demonstrated that business needs could be met without the sole reliance on new land release. These documents demonstrate the difficulty of forecasting economic change accurately, and of predicting the demands of modern businesses for land and workspace, in terms of quantity, quality and location. The Monitoring Report informs readers that 45% of the time period for the Local Plan 2006-28 has now passed, but only 31% of the target for new employment land has been provided. Delivery on the ground is described as "strikingly different" from what was planned in the Long-Term Economic Forecasting report, July 2017. The 'Rest of the District' developed more new sites than the main towns.
- 4.27 I consider that the difficulties of predicting demand for employment land and business premises, however, should not deter the Neighbourhood Planning Team from seeking to ensure that the economy of Wincanton is not held back by the availability of new land and buildings in appropriate locations. The Business Needs Report, March 2017, reports on surveys of local businesses in Wincanton in 2013 and 2015, which provide evidence of future demand for larger and new premises. SSDC's evidence highlights the fact that the A303 upgrade may have an impact on the local economy. If it has a positive effect (paragraph 7.96 of the Local Plan suggests it could improve Wincanton's connectivity 'offer' to potential inward investors), this could stimulate the demand for new employment land.
- 4.28 Policy 12 supports and does not require new development outside the development area. Also, it aims to limit such development to specific instances where existing and serviced sites to meet identified demand are absent. I consider that it is sufficiently clear in the supporting text on Page 20 what is intended by "employment", and the local highway authority would advise whether a specific proposal for development would

give rise to transport movements which would have unacceptable effects. The wording of the policy could be strengthened to ensure that it does not lead to unacceptable consequences for neighbouring residents or the countryside, contrary to national and local planning policies, or the achievement of sustainable development. **PM13** should be made accordingly.

- 4.29 Regarding Policy 13. Design and Layout of Employment Areas, SSDC commented that Policy TA6 of the Local Plan gives parking standards, and new developments can only address parking issues related directly to their own proposals. However, Policy 13 acknowledges the role of 'adopted parking standards' and only encourages (my emphasis) solutions that would help alleviate existing problems with parking and access. It is reasonable to consider opportunities for shared parking and, where practical, include them in development proposals, in my opinion. As the policy is not requiring these measures, I am satisfied that it should not be too onerous for developers nor in conflict with the Local Plan's parking standards. Policy 13 aims to achieve good design and therefore has regard for national policy.
- 4.30 Section 8 of the NP addresses Objective 4, to make the town centre more attractive to users. It is noted that local residents support town centre vitality, but there is no policy to achieve this. The South Somerset Local Plan, 2015, refers to the Retail Study Update, November 2010, which predicted increased retail expenditure and capacity for additional comparison and convenience floorspace in Wincanton by 2028. The Local Plan's Policy EP9 includes a retail hierarchy for the South Somerset District, with Wincanton as a market town where development of main town centre uses should be of a scale commensurate with the settlement's role and function, and not unbalance the overall town centre hierarchy. Policy EP11. The Location of Main Town Centre Uses, promotes the sequential approach for development proposals, consistent with national planning policy. Policy EP12 sets a floorspace threshold for new development in market towns of 750sqm (gross), above which proposals would have to undertake a retail impact assessment. Policy EP13. Protection of Retail Frontages, is also relevant to Wincanton, especially as much of its town centre is designated as a Conservation Area.
- 4.31 In addition, the Local Plan cautions that "*In order to achieve the goal of having a wealth of shops in a bustling High Street it will be important to retain and build upon existing retail provision and ensure that the potential for retail growth which does exist is directed towards the town centre*". The NP is silent on the subject of new retail floorspace, and of specific measures to protect its High Street. I see no need for the NP to allocate sites for town centre uses, and paragraph 9.92 of the Local Plan supports this approach. However, it is clear that some out-of-centre

development of supermarkets has taken place in the past, and I consider that the NP should include a stronger statement to limit any such future development which might detract from the town centre's vitality and viability. I appreciate that Neighbourhood Plans should not repeat the policies in Local Plans, but consider that cross-references to relevant policies would in this instance reinforce the NP's Objective 4. **PM14** would achieve this, having regard for section 2 of the NPPF and it would ensure general conformity with the Local Plan.

- 4.32 The Plan describes a Town Centre public realm improvements scheme, which is being developed with SSDC and Somerset Council as the highway authority. This is designed to improve the environment for pedestrians in South Street and High Street, and add an extended 20mph traffic zone in the town centre. I consider that it should help to enhance the vitality of the town centre. As long as the proposed modifications described above are made, I conclude that the NP's Policies 12 and 13, and Section 8 should promote sustainable development of the town's economy and town centre, in general conformity with the Local Plan and having regard for national policy. The Basic Conditions will be met.

Issue 3 -The Environment

- 4.33 Section 6.1 of the NP describes the character of the landscape and built environment of the Parish, in terms of four sub-areas, and assesses the potential for sustainable development. It is under-pinned by the appraisal in the PlaceCheck Report, March 2016. Pages 12 and 13 of the NP describe the potential for new housing development 'Within the Town'. Reference is made to 'key buildings and green spaces within the town' that are important. This generalised statement should be amended in my view to state that Wincanton includes a substantial Conservation Area with many listed buildings, since these designations offer a high level of protection. I consider that **PM5** is essential, having regard for national planning policy, and to contribute towards sustainable development.
- 4.34 Similarly, Page 14 of the NP should give greater prominence to the fact that Wincanton has a Conservation Area reflecting its special architectural and/or historic interest. **PM5** and **PM7** should be made to modify the text on Page 14 and Policy 2, with the addition of a new map to show the boundary of Wincanton Conservation Area. The Conservation Area Appraisal refers to 91 listed buildings and nearly 40 unlisted buildings/groups of merit, and my site visit confirmed the area's special attractiveness and historical diversity. Page 19 onwards of the Appraisal provides further detail of unlisted buildings of value. The Town Council advised me that the Somerset Historic Environment Record and SSDC's conservation team would be good sources of knowledge for understanding undesignated heritage assets. These should be mentioned in Policy 6 to

provide assurance that objective assessment rather than merely local opinion would be used to determine historical significance. PM7 and **PM8** are needed, having regard for national planning policy for conserving and enhancing the historic environment (section 12 of the NPPF).

- 4.35 In other respects, I am satisfied that the scope and coverage of Policies 1-6 is in general conformity with Strategic Objective 8 and Policies EQ2-EQ6 of the Local Plan. Those, in brief, address protecting and enhancing the natural environment, historic environment and biodiversity; design to achieve high quality and local distinctiveness; and improving green infrastructure and woodlands/forests. Policies 1-6 should be helpful to potential developers and the achievement of sustainable development. It is clear enough from the wording of Policies 3,4 and 5 when landscape management schemes will be needed, in my view.
- 4.36 Section 9 of the NP addresses Objective 5. To protect public open spaces and improve walking and cycling routes. Policy 14 identifies eleven Local Green Spaces, and I have considered whether the policy has full regard for the NPPF, paragraphs 76-78. The NPPF states that Local Green Space (LGS) designations should be capable of enduring beyond the end of the plan period, and LGS designation will not be appropriate for most green areas or open space. Those considerations have led me to question whether a small town such as Wincanton in a countryside setting merits as many as eleven LGSs. My assessment has been based on my site visit, the background evidence to the NP, the NPPF and the Government's Planning Practice Guidance [ID:37-007-20140306 to 37-022-20140306].
- 4.37 The first proposed LGS is the cemetery immediately west of Cale Park (LGS 1), which is clearly of local significance and provides a tranquil area of open space. The churchyard (LGS 2) is also of historic importance and provides a visually attractive setting to the church. However, it lies within Wincanton Conservation Area, where the PPG states that consideration should be given as to whether any additional local benefit would be gained by designation as LGS. The churchyard provides the setting to the listed parish church of St Peter and St Paul. I consider that the additional benefit of LGS designation would be negligible, and therefore do not endorse LGS 2. Cale Park (LGS 3) including the recreation ground is a distinctive open, green area within easy walking distance of the town centre. The Park is well maintained and well used, and LGS 3 should be designated, as should the cemetery (LGS 1).
- 4.38 The Riverside Walk, Cash's Park and Coneygore & Wrixon's View (proposed LGSs 4, 5 & 6) are described as important spaces in the PlaceCheck Report and Page 4 indicates that they form part of an "*important green link*" running north of the recreation ground to Shadwell, Cash's Park and north of Carrington Way. The PPG states that there is no

need to designate linear corridors as LGS simply to protect rights of way. In this instance, I understand from the NP that much of the Riverside Walk is in private ownership, but it lies within flood zones 2 and 3 so that the risk of future development would seem to be unlikely¹⁶. As such, I do not endorse LGS 4. Cash's Park and Coneygore & Wrixon's View lie within the Wincanton Conservation Area and clearly contribute towards its special character and appearance. I see no need for the additional designation to be afforded to LGS 5 and 6.

- 4.39 SSDC stated that the access to Home Drive Playing Field (LGS 7) should be clarified. Although the site is reportedly used by a pre-school and described as having recreational value, from my site visit I was unsure how much it was used by the wider community, and whether it was accessible to them. The PlaceCheck Report describes the Playing Field as having "more local value" than other open spaces such as the cemetery and recreation ground. Since the NPPF states that LGS designation will not be appropriate for most green areas or open space, I consider that Home Drive Playing Field should not be so designated as LGS7. The PlaceCheck Report also identifies land at the corner of Common Road & Deansley Way (LGS 8) as "perhaps of more local value" than other green spaces such as the Recreation Ground and Cemetery. Although this extended area of grass verge has a seat and two or three mature trees, I consider that its value in terms of appearance and usage is not sufficient for its designation as LGS.
- 4.40 As I saw at my site visit, the Charity Field off Bayford Hill (LGS 9) provides an important gap in the built development which enables long-distance views across the countryside to the south. The PlaceCheck Report describes it as open space of "notable local value", and I am satisfied that the designation of LGS 9 is appropriate. The Eastern areas (LGS 10) is described in the NP as a "*well used area (which) allows 'wild play' and is a wildlife habitat*". I accept its importance to this recently developed part of Wincanton and support the LGS 10 designation. LGS 11, New Barns attenuation pond area, is an open area and wildlife habitat close to the River Cale and adjoining the Recreation Ground, LGS3. The Local Plan Inset Map indicates that it could be susceptible to flooding, so is unlikely to be built on. The NPPF advises that LGS designation should not be applied to an extensive tract of land. I consider that the cemetery and recreation ground already occupy a sizeable area, and that adding the New Barns attenuation pond area could make LGS coverage overly extensive. Accordingly, LGS 11 should not be designated.
- 4.41 I therefore conclude that only four of the proposed LGSs, the cemetery (LGS 1), Cale Park (LGS 3), Charity Field off Bayford Hill (LGS 9) and Eastern areas (play area etc) (LGS 10) should be designated as such.

¹⁶ Inset Map 14, Wincanton, South Somerset Local Plan, 2015, Policies Map.

Intelligent Plans and Examinations (IPE) Ltd, Regency Offices, 37 Gay Street, Bath BA1 2NT

Registered in England and Wales. Company Reg. No. 10100118. VAT Reg. No. 237 7641 84

This conclusion does not mean that the other proposed sites have no value as local green space, but it has regard for national policy which is clear that the designation should not be used liberally. I consider that the table on Pages 24 & 25 should be modified to state that four green spaces should be designated as LGS, and then list the remaining seven sites, explaining that they are adequately protected by other designations or do not meet the NPPF paragraph 77 criteria to be designated as LGSs. The map on Page 25 should also be modified to reflect these changes. It should continue to show all eleven spaces but should differentiate sites in the Conservation Area and the lower ranked spaces from LGSs. The Proposals Map on Page 28 should be amended so that it differentiates between the LGSs and other green spaces.

- 4.42 The Proposals Map is similar to the map on Page 4 of the PlaceCheck Report. The latter shows another significant green feature, namely the “important green link” up the river valley to Shadwell. As this green corridor will have importance for wildlife as well as for recreation and walking, I consider that it should be shown on the Proposals Map. This would reinforce the message given in Policy 4 of the NP.
- 4.43 The monitoring process for the NP, described in section 10, will enable the Town Council to monitor the significance, quality and usage of all the Town’s green spaces and review its Policy 14 in five years time. **PM15 & PM16** should be made so that the NP has regard for national planning policy and promotes the achievement of sustainable development.
- 4.44 Policy 15. Key Pedestrian and Cycle Routes, should protect and enhance the existing network, and facilitate more sustainable travel across the town in line with paragraph 35 of the NPPF. I support the policy which is also in general conformity with Policy EQ5 of the Local Plan. I conclude that, as long as the above-mentioned modifications are made, the Wincanton NP meets the Basic Conditions thereby ensuring the protection and improvement of the local environment.

5. Conclusions

Summary

- 5.1 The Wincanton Neighbourhood Plan has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for neighbourhood plans. I have had regard for all the responses made following consultation on the neighbourhood plan, and the evidence documents submitted with it.

- 5.2 I have made recommendations to modify a number of policies and text to ensure the Plan meets the Basic Conditions and other legal requirements. I recommend that the Plan, once modified, proceeds to referendum.

The Referendum and its Area

- 5.3 I have considered whether or not the referendum area should be extended beyond the designated area to which the Plan relates. The Wincanton Neighbourhood Plan as modified has no policy or proposals which I consider significant enough to have an impact beyond the designated neighbourhood plan boundary, requiring the referendum to extend to areas beyond the plan boundary. I recommend that the boundary for the purposes of any future referendum on the plan should be the boundary of the designated neighbourhood plan area.
- 5.4 I appreciate the hard work that has gone into preparing this NP, in gathering relevant evidence and responding to the views of the community's residents and local businesses. The submitted NP demonstrates good local knowledge and understanding of Wincanton's future challenges and potential. I consider that, with the proposed modifications, the Plan should be an effective tool in securing and managing high quality new development. It should help prospective developers to put forward proposals which are appropriate and sensitive to the needs of Wincanton.

Jill Kingaby

Examiner

Appendix: Modifications

Proposed modification number (PM)	Page no./ other reference	Modification
PM1	Page 6	<p>Figure 1. Area context</p> <p>Add a key to this map to clarify that the area shown in red is the Parish of Wincanton which is the area covered by the Neighbourhood Plan.</p>
PM2	Page 11	<p>Section 6. Housing</p> <p>Amend the first paragraph to read:</p> <p>While the town has seen a high level of recent housebuilding, the reality has been that without a District-wide 5 year housing supply, planning applications for further development in and around Wincanton could still have come forward and be have been permitted. This isare were considered 'out of date' ... is was significant shortfall. So, when this happened, unless there are were ... are were likely to be considered favourably.</p> <p><i>Following the ministerial Paper of 12th December 2016, policies for the supply of housing land in Neighbourhood Plans would not be considered out of date, if the local planning authority could demonstrate a three year housing land supply. However, consultation is now taking place, in 2017, on the potential provisions of a revised National Planning Policy Framework (NPPF) which is expected to include a standardised methodology for assessing local housing need. Government aims to introduce the revised NPPF by Spring 2018.</i></p> <p>However although Even if some Even if some local plan (and even some neighbourhood plan) policies may do become out of date.....</p>

PM3	Page 11	<p>Last sentence at bottom of page:</p> <p>Lawrence Hill is a particularly interestingto the town, and should remain undeveloped. be retained as informal open space</p>
PM4	Page 12	<p>Fourth paragraph beginning "Somerset County Council's Service Manager for Schools Commissioning ... "should be deleted. Replace it with:</p> <p><i>If further major housing development is proposed for the town, prospective developers should liaise with Somerset County Council's Service Manager for Schools Commissioning to ensure that appropriate provision for new school places can be secured.</i></p>
PM5	<p>Pages 12 to 15</p> <p>Within the Town</p>	<p>First paragraph - ...opportunities on previously developed land ... One such example is the Tythings site.</p> <p>Last paragraph on Page 12</p> <p><i>Figure xx shows the boundary of Wincanton Conservation Area which encompasses the historic core of the town.</i> There are a number of key and countryside beyond. Poorly planned development might cause harm to the character or appearance of the Conservation Area or views in and out of it. BlockSignificant existing views might be blocked, reduce the quality of such green spaces and links reduced, and miss opportunities missed to reinforce</p> <p>Page 13</p> <p>Heritage features must be respected are two such examples. <i>The Somerset Historic Environment Record and South Somerset Conservation Team also have knowledge of local undesignated assets.</i> The design and layout.....</p> <p>Page 14 – second paragraph, second bullet point:</p>

		<ul style="list-style-type: none"> Protecting and reinforcing the network of key buildings and spaces around the town. Regard should be had for preserving or enhancing the character or appearance of Wincanton Conservation Area, and conserving its Listed Buildings. By considering h How the design and layout can can might create positive visual and route connections should be considered. These were Key buildings and spaces were identified from <p>- bottom of the page</p> <p>Encouraging opportunities for development to reflect the interesting history ... The Somerset Historic Environment Record backed up by local knowledge can could</p>
PM6	Page 15	<p>New text before block of six policies including Policy 2</p> <p>The policies take forward Strategic Objective 8 and Policies EQ2 – EQ6 of the South Somerset Local Plan which seek to achieve high quality design and promote the area’s local distinctiveness. Specific development proposals for new housing will also be assessed with careful attention to viability and deliverability, in accordance with national planning policy.</p>
PM7	Page 15	<p>Policy 2. Key Buildings and Spaces</p> <p>All development proposals should preserve or enhance the character and appearance of Wincanton Conservation Area, shown in Figure xx, and conserve the town’s Listed Buildings. Where development allows</p> <p>Add a new Figure (xx) to show Wincanton Conservation Area.</p>
PM8	Page 15	Policy 6. Interpreting the history of a site

		<p>Site features The District Council's record of Listed Buildings, its Conservation Team's information on undesignated heritage assets and the Somerset Historic Environment Record should be referenced. In addition, cConsultation with the local community ...</p>
PM9	Pages 16, 17&18	<p>Fifth paragraph Page 16</p> <p>The latest evidence potentially affordable housing being prescribed pursued through national guidance ... owner-occupation, and a target ... report's conclusions. The exact proportion of new homes to be Starter Homes will depend on Government policy in the expected revision of the NPPF, and will be a matter for negotiation with developers and South Somerset District Council. as a much higher discount than affordable rents. Local connection is defined as currently living or in permanent work in Wincanton Parish, and has been so for 3 of the past 5 years. Other factors which demonstrate a clear link to the local area, including the surrounding parishes, may also be taken into consideration.</p> <p>Policy 8. Starter Homes for Local People</p> <p>The provision of starter homes for first time buyers should be will be supported on up to 20% of new homes. where there is a demonstrable need and subject to the viability of the development. Such provision</p> <p>Second paragraph, Page 18</p> <p>Similarly, the Government's regulations starter homes to be provided in addition.</p> <p>New footnote to Page 18</p> <p>Wincanton Neighbourhood Plan Evidence Base - Housing Review Report, April 2016, SHMA Update March 2017, by Dorset Planning Consultant Ltd informs the</p>

		information included in section 6.2.
PM10	Page 18	Policy 9. Accessible and Adaptable Homes New homes..... within any proposed mix, where feasible and viable.
PM11	Pages 17 & 18	Policy 10. Custom and Self-Build Homes Delete the second paragraph beginning: On larger sites of more than 30 houses..... Modify the final paragraph of text on Page 18 as follows: Although at the time.....over the plan period. The requirements in Policy 10 will only apply where there is clear evidence of need. Landowners and developers of large sites should acquaint themselves with evidence of likely demand on the District Council's self-build register.
PM12	Pages 20 & 21	Modify the second paragraph on Page 20: Parts of these existing employment sites As such, we have included a policy..... but not as restrictive as Policy EP3 of the Local Plan, which requires at least 18 months marketing of the site and significant environmental improvements and other measures before it can be released from employment use should be applied. It is important that the overall availability lewest of Wincanton Business Park) was is included in the Local Plan..... Delete Policy 11. The Retention of Employment Land (and renumber subsequent policies sequentially).
PM13	Pages 20 & 21	Third paragraph on Page 20: It is important that A303 slip road can be established. The District Council's Economic Development Monitoring Report (April 2017) and related studies of economic forecasting and employment land take-up in South Somerset indicate the difficulties of predicting how much new land will be

		<p>required and where it would be best located. By providing the flexibility</p> <p>Policy 12. New Employment Areas</p> <p>In the absence of existing and available serviced sites to meet and identified.... for new employment sites outside of the town's</p> <ul style="list-style-type: none"> • Support the town's •avoiding routes through residential or other sensitive areas where significant traffic movements would be detrimental to existing nearby uses and their occupants the living conditions of residents or cause harm • Avoid giving rise to ... leisure usesNot result in noise, pollution or other effects which would cause harm to the living conditions of neighbouring residents, and • Not result in <p>..... for major rebuild.</p>
PM14	Page 22	<p>Objective 4. Make the town centre more attractive to users</p> <p>Residents wantsupport town centre vitality. Policy EP9 defines Wincanton as a market town where the development of town centre uses should be of a scale commensurate with the town's position in the retail hierarchy. Policy EP11. The Location of Main Town Centre Uses promotes a town centre first approach to new development in line with national planning policy. Policies EP12 and EP13 concerning floorspace thresholds for new developments and protection of existing retail frontages are also relevant to securing a vital and vibrant town centre for Wincanton. And In addition, the Government has made a number</p>
PM15	Pages 24 &	Amend the last sentence of paragraph 2 on

	25	<p>Page 24 to read:</p> <p>The following Four green spaces have therefore been identified as Local Green Spaces for special protection as shown below. These are followed in the second table by a number of green spaces with local importance which are not, however, designated as Local Green Space because (1) they are protected by other designations eg. they are located within the Conservation Area, and/or (2) they do not satisfy in full the criteria in paragraph 77 of the NPPF. All the green spaces have some local importance and should be retained as areas of open space.</p> <p>Table on Page 14 should be split into three sections. The top section should list the following as LGSs:</p> <p>Cemetery 1</p> <p>Cale Park (inc. recreation Ground) 3</p> <p>Charity Field off Bayford Hill 9</p> <p>Eastern areas (Play area & field to east of Morpork St & area north of Kinklebury St.) 10</p> <p>The second section should list the following as green spaces which contribute to the character and appearance of the Wincanton Conservation Area:</p> <p>Churchyard 2</p> <p>Cash's Park 5</p> <p>Coneygrove & Wrixon's View 6</p> <p>The third section should list the following as Other Green Areas and Open Space to be retained:</p> <p>Riverside Walk 4</p> <p>Home Drive playing field 7</p>
--	----	---

		<p>Corner of Common Road & Deansley Way 8</p> <p>New Barns attenuation pond area 11</p> <p>Policy 14. Local Green Space, and other green areas or open space</p> <p>Local Green space designations for designation. Development proposals which retain the other green and open spaces identified in the table above will be supported.</p>
PM16	Pages 25 & 28	<p>The maps should be modified so that they distinguish LGSs from important green spaces in Wincanton Conservation Area, and other green and open spaces, in accordance with PM15.</p> <p>The Proposals Map should show the Important Green Link along the river valley as illustrated on Page 4 of the PlaceCheck Report.</p>