

South Somerset District Council Local Development Scheme **(2015 – 2018)**

1. Introduction

- 1.1. A Local Development Scheme (LDS) is required under Section 15 of the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011). The LDS must specify (among other matters) the documents which, when prepared, will comprise the Local Plan for the area. It must be made available publically and kept up-to-date.
- 1.2. This version of the LDS covers the period 2015 – 2018 and sets out a programme and resourcing plan for various documents to be prepared and finalised. It also identifies inter-dependencies, risks and contingencies associated with their delivery.
- 1.3. In accordance with the requirements of the Localism Act 2011, the LDS is available to the public. Progress against the LDS and the authority's compliance with the timetables set out will be monitored and reported at least annually (and earlier if and where appropriate) alongside the overall Authority's Monitoring Report (AMR).

2. Context and Background

- 2.1. South Somerset District Council's (hereon 'the Council') first LDS was adopted in September 2007 and set the approach for the period 2007 – 2010. It was updated in January 2013 to cover the period 2013 – 2016.
- 2.2. Since then, in March 2015, the Council has adopted the South Somerset Local Plan (2006 – 2028)¹, which alters the perspective on what future evidence, strategies and documents should be produced to shape the future of South Somerset.
- 2.3. The previous intention, once the Local Plan was adopted, was to progress to a series of related 'Development Plan Documents' and 'Supplementary Planning Documents'. However, three issues have altered the Council's thinking on the way forward, these are:
 - the preferred approach set out in the National Planning Policy Framework (NPPF) is to have the various component parts needed for a development plan to be captured within one document;
 - the Council has been advised to undertake an 'early review' of the local plan to clarify specific issues relating to housing and employment provision in Wincanton. This early review must be completed within three years of the date of adoption of the local plan, i.e. by March 2018; and

¹ South Somerset Local Plan (2006 – 2028) was adopted at a meeting of Full Council on the 5th March 2015.

- the Council remains committed to adopting a Community Infrastructure Levy, and it is advocated by the NPPF that this should be brought forward in parallel with the production of a local plan.

2.4. Reflecting on these changes in circumstance, the Council believes there is an opportunity to make a transition into the 'all-in-one' local plan, *and* deliver an early review at the same time. Taking this decision dictates priorities, timescales, and resource allocation; and therefore drives the programme of work set out in this LDS.

3. Delivering An Early Review of the South Somerset Local Plan (2006 – 2028)

3.1. Overview

3.1.1. The South Somerset Local Plan (2006 – 2028) was adopted in March 2015. The Inspector, in accepting that the Local Plan was 'sound', set out that the Council should undertake an early review of the policies relating to housing and employment provision in Wincanton. This early review is to be completed within three years of the date of adoption, which would be no later than **March 2018**.

3.1.2. Alongside this requirement, the Council has previously stated it will produce a Site Allocations Development Plan Document (DPD) to provide the additional detail on proposals for 'Sustainable Urban Extensions' in Yeovil and 'Directions of Growth' in Market Towns.

3.1.3. In reality, it will be more efficient to produce the additional site-specific detail on growth locations in parallel with the work to carry out an early review of housing and employment provision in Wincanton. Both would involve formal processes, such as:

- the preparation and scrutiny of technical evidence;
- undertaking statutory public consultation;
- complying with the legislative requirements of Sustainability Appraisal, Habitats Regulation Assessment, and Equalities Analysis; and
- Independent Examination to ratify the policies and plans.

3.1.4. To do each document in sequence would duplicate effort and result in a less than optimal allocation of resources. It would also pose the risk that whilst doing the work separately, other parts of the Council's evidence-base would become out-of-date and no longer relevant to the challenges in South Somerset. This could mean any policy approaches prepared are vulnerable to challenge and potentially found unsound during Independent Examination.

3.1.5. Therefore, the approach advocated in this LDS is to 'slot-in' the site-specific work into the early review of the local plan. The timescale to complete all aspects will conform to the deadline set out for completing the early review – March 2018.

3.2. Updating the Evidence Base

3.2.1. The starting point for carrying out the early review of the local plan is to generate a robust and up-to-date evidence-base. This will constitute the majority of work which will be carried out during the LDS timeframe. A number of the required evidence-based documents are inter-linked, whilst some will be required to be prepared in sequence.

3.2.2. To inform the early review of the local plan, the following documents will be required to be prepared / updated:

- Infrastructure Delivery Plan;
- Community Infrastructure Levy (incorporating viability appraisals);
- Strategic Housing Market Assessment (including consideration of objectively assessed housing need and functional economic market area);
- Strategic Housing and Economic Land Availability Assessment;
- Settlement Profile Analysis;
- South Somerset Transport Strategy;
- Retail Impact Assessment;
- Landscape Strategy; and
- Heritage Strategy.

3.2.3. At the same time, there are a number of other workstreams which require on-going and regular assessments, or technical analysis. This includes:

- Preparing and updating the Council's Five-year Housing Land Supply position;
- Producing the Authority's Monitoring Report; and
- Providing responses to Development Management issues, cases; including writing statements of case and providing evidence at planning appeal inquiries.

3.2.4. All together this represents a significant body of work, and will be a major undertaking in terms of the time, staff inputs, financial resources, Elected Member engagement, community engagement, and liaison with other stakeholders/organisations/agencies. Inherently, there are some evidence-base documents that should be treated as a higher priority than others. This dictates the timing of their delivery and the resources allocated to them.

3.3. Finalising the Early Review of the South Somerset Local Plan (2006 – 2028)

3.3.1. As well as producing the additional evidence to inform the early review of the South Somerset Local Plan (2006 – 2028), the Council is required to carry out community engagement, public consultation, discussions with other stakeholders, as well as carry out a Sustainability Appraisal and Habitats Regulation Assessment to meet the statutory requirements for preparing a local plan.

3.3.2. At this moment it is not appropriate to set out the precise timetable for public consultation on the draft stages of the revision to the local plan as this will be determined by the outputs from the evidence gathering stages of work, and from the Council's monitoring of the delivery of the adopted local plan. As and when consultation stages occur these will be carried out in accordance with the regulations and standards set out in the Town and Country Planning (Local Planning) (England)

Regulations 2012, and the Council's own good practice set out in the Statement of Community Involvement².

4. Timescales for Delivery

- 4.1. Having considered the desired outcome for an early review of the local plan, the sequence and timing for preparing the necessary evidence base documents is outlined in Table 4.1 below. As noted above, the necessary work, including formal public consultation on the early review of the local plan must be completed by March 2018.

Table 4.1: Timetable for delivery of evidence base documents

Evidence Base Document		Start Date	Completion Date	Produced
1.	Statement of Community Involvement	May 2015	September 2015	In-house
2.	Infrastructure Delivery Plan	January 2015	October 2015	In-house
		March 2016	October 2016	
3.	Confirmation of Housing Market Area and Functional Economic Area	March 2015	September 2015	In-house / Externally
4.	Community Infrastructure Levy	March 2015	April 2016	In-house / Externally
5.	Settlement Profiles & Assessment	July 2015	July 2016	In-house
6.	Full Strategic Housing Market Assessment	September 2015	March 2016	In-house / Externally
7.	Strategic Housing and Employment Land Availability & Detailed Sites Assessment (including Gypsy, Traveller and Showpeople sites).	October 2015	June 2016	In-house / Externally
		October 2016	June 2017	
8.	Landscape Assessment & Strategy	October 2015	October 2016	In-house
9.	Heritage Assessment & Strategy	October 2015	October 2016	In-house
10.	South Somerset Transport Strategy	January 2016	August 2016	In-house / Externally
11.	Strategic Flood Risk Assessment	March 2016	October 2016	In-house / Externally
12.	Retail Impact Assessment	March 2016	October 2016	In-house / Externally
13.	Annual Monitoring Report	Every Six Months		In-house
14.	Five-year Housing Land Supply	Annually		In-house
15.	Processing and Liaising with Neighbourhood Plans	On-going		In-house
16.	Development Management Responses / Preparing Proofs of Evidence / Attending Appeals	On-going (Reviewed every six months)		In-house

N.B. Dates do not include time required for Council sign-off processes, or additional time required to secure approval from District Executive and/or Full Council.

² Current Statement of Community Involvement is from 2007. This will be updated by September 2015. Existing version can be found here:
<http://www.southsomerset.gov.uk/media/15618/Statement%20of%20community%20involvement.pdf>

- 4.2. Based upon the production of the above evidence it is expected that the formal stages of producing the early review of the local plan will commence from mid-2016. An indicative timetable is set out below in Table 4.2. The timetable is subject to change depending upon a number of factors, namely: the outcome of the evidence gathering work, and any external influences such as changes in Government policy.
- 4.3. Given the number of uncertainties which may arise over a three-year period, the monitoring and review processes established by the Council, including the Authority's Monitoring Report will be used to track progress over the defined LDS period. Where there is a need to vary the timetable due to circumstance, this will be reported to District Executive committee and a resolution to alter the LDS timetable will be sought. This is set out in more detail in section 8.

Table 4.2: Indicative timetable for formal stages of delivering the early review of the local plan

Local Plan-making Stage	Indicative Date
Public Consultation with Range of Interested Parties, including Communities on Scope and Issues (Regulation 18)	March 2016
Public Consultation on Preferred Approach (Regulation 18)	October 2016
Statutory Consultation on 'Proposed Submission' / 'Publication' version of the revised Local Plan (Regulation 19)	March 2017
Submission to Secretary of State (Regulation 22)	June 2017
Estimated Examination	September 2017
Estimated Date for Adoption	March 2018

N.B. Dates do not include time required for Council sign-off processes, or additional time required to secure approval from District Executive and/or Full Council.

5. Approach to Considering Other Work / Evidence Base Documents

5.1. Overview

5.1.1. As well as those core priorities outlined in Table 4.1, it is recognised that there are a number of subsidiary workstreams which have been previously explored. The prioritisation of these issues may change over time depending upon whether they become more or less important to the critical path of achieving the early review of the local plan. However, at present, the following documents are not included in the programme of work within this LDS:

- Green Infrastructure Strategy;
- Education Strategy;
- Town Centre Boundaries and Primary/Secondary Shopping Frontages; and
- Yeovil Town Centre Strategy & Masterplan.

5.1.2. As set out in Section 6, if any of these documents are requested, or determined to be necessary to ensure the robust preparation of the review of the local plan, there will likely be a requirement for additional resources beyond those currently identified.

5.2. Impact of Planning Appeals and Inquiries

5.2.1. The Spatial Policy team is mindful of the time and resource implications linked to preparing for planning appeals and presenting at appeal inquiries. As the development industry regains confidence and submits more planning applications, it is likely that more appeal situations will arise.

5.2.2. Whilst this work is identified in Table 4.1, the Council will record and monitor the impact of fulfilling this obligation every six months. If it is shown that it is having a detrimental impact on the overall objective of delivering the early review of the local plan, then a request for additional funding and/or resources will be made to the Council.

5.3. Impact of Neighbourhood Planning

5.3.1. The Council has committed to providing light touch support to those organisations/bodies that are progressing neighbourhood plans. This has an implication on resources within the service and currently support provided is not matched by the financial contributions received from central Government. Should a significant number of additional groups look to progress neighbourhood plans a separate and additional resourcing plan will be required. If this occurs, a resourcing proposal will be submitted to District Executive for review.

5.3.2. At a more general level, after neighbourhood plans are examined and come into effect, they become part of the statutory development plan for the area that they cover. They can be developed before, after or in parallel with a Local Plan, but the law requires that they must be in general conformity with the strategic policies in the adopted Local Plan for the area. Neighbourhood plans are not tested against the policies in an emerging Local Plan although the reasoning and evidence informing the Local Plan process may be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested.

5.3.3. In progressing the early review of the local plan, the Council will work positively and constructively with any qualifying body to, where appropriate, share evidence and resolve any potentially conflicting issues. Should any neighbourhood plans be made prior to the adoption of revised local plan, the Council will take it into account its strategy and policies, and avoid duplicating policies that are in the neighbourhood plan.

6. Resources

6.1. Overview

6.1.1. As a result of the Council's 'lean review' process carried out in 2014, the Spatial Policy service currently has 9 members of staff, which equates to 7.7 Full-Time Equivalent

members of staff. From an operational perspective this represents the minimum requirements to deliver on the forecast workload set out in Table 4.1 and Table 4.2.

6.1.2. Table 4.1 sets out a challenging programme of work. As such, it will not be possible to cater to additional project work over and above that set out unless further resources are made available. During the lifetime of the LDS, should requests be received for technical support outside of that defined in Table 4.1, it will trigger requests for additional funding and/or resources.

6.2. Use of External Resources

6.2.1. To achieve the desired outcomes from delivering the project work outlined in this LDS is recognised that external support, most obviously through use of private-sector consultants, will be required throughout the LDS period. The exact budgetary requirements and financial implications will be finalised during the procurement of each piece of project work which is commissioned. However, the existing budgetary ceiling against which decisions will be made is linked to the existing Spatial Policy and Local Plan budgets and reserves.

6.2.2. It is also likely that during the course of delivering the work set out in the LDS that the Council will collaborate with other/neighbouring local authorities to deliver required outputs. This may take the form of jointly procuring consultancy support, or it may be joint-working through officers to maximise the opportunities brought about by the requirements of the 'Duty to Co-operate'. The Council has long-standing relationships with neighbouring local authorities and has successfully procured commissions to improve the evidence-base, most recently for example on the jointly commissioned update on the extent of the Housing and Economic Market Areas.

6.2.3. The Council is increasingly in the position where services, data, analysis and advice which would ordinarily be forthcoming from Somerset County Council (SCC) are no longer available. This is as a result of budget and staff reductions at SCC. Where there is a requirement for professional advice and analysis to inform our position on matters of transport, education, and health, it is now the case that SSDC will have to resource and finance these technical inputs. The role of SCC will revert to a more strategic advice giving function, with assistance providing on shaping the briefs for technical work but with little or no direct involvement.

6.2.4. The implication of this change in service delivery by SCC is a significantly increased financial burden on SSDC and the Spatial Policy service. Over the course of the LDS period this is expected to amount to between £50,000 and £100,000 of costs incurred by SSDC to help fill the gap in technical input.

6.3. Future Resources

6.3.1. During the timeframe established by the LDS it will be worth exploring what, if any, resource for producing evidence and technical reports could be available from the Heart of the South West Local Enterprise Partnership (LEP). At present, this appears limited, but subject to further devolved funding and an enhanced role for the LEP on matters such as spatial planning and housing, this may be a possibility.

7. Risks

- 7.1. At a project-level each individual workstream will come with specific risks that need to be scoped out and contingency arrangements established to effectively managing those risks. This will be done at the initiation of each project and documented alongside the proposed scope of works.
- 7.2. At the programme-level it is possible to identify a number of strategic risks, which require consideration and effective mitigation measures to ensure successful delivery. The current foreseen risks are set out in Table 7.1 below.

Table 7.1: Risk Assessment

Risk		Likelihood	Effect	Proposed Mitigation
1.	Reduced level of involvement and technical inputs provided by SCC	High	High	Maximise use of SSDC / Spatial Policy budgets and resources to procure (where necessary) alternative specialist advice to aid project delivery.
2.	Lack of political support and sign-off for proposed LDS.	Medium	High	Early engagement with Members, especially in initial period on making of new Council to establish positive working relationship. Regular engagement with Portfolio Holder and Local Plan Working Group to inform and update on progress of project work; as well as interim and final outputs.
3.	Change in Government policy over LDS period changes what is required in a Local Plan.	Medium	Medium	Regular (every six months) review of Government policy. Paper tabled to Local Plan Working Group to identify any changes required to LDS.
4.	Failure to procure external consultancy support to deliver specific project-work.	Low	High	Utilise existing consultancy frameworks to secure appropriate consultants. Explore opportunities for joint commissioning with other local authorities where appropriate to share risk.
5.	Lack of skills, experience, and capability amongst existing staff	Low	Medium	Team is currently appropriately resourced. Any staff turnover / losses will be managed by Team Leader and Associate Director for Economy to ensure consistency of resource.
6.	Project-level milestones, timescales and outputs not met.	Low	Medium	Regular project-specific meetings and reviews to manage individual project milestones and outputs. Should two consecutive milestones be missed an 'update' report should be tabled to Local Plan Working Group explaining impact and identifying resolution.

N.B. 'Likelihood' is categorised into: Low / Medium / High.

'Effect' is categorised in terms of impact on delivery into: Low / Medium / High

8. Monitoring & Review

- 8.1. The LDS schedules work, resources and financial commitments for a period of three years. In the initial phase of implementing the LDS it will be prudent to monitor and review progress every six months to ensure the programme achieves momentum and becomes self-reinforcing.
- 8.2. This should continue for two reporting cycles, e.g. for the first 12 months, taking the process up to the end of 'Year One' in the overall LDS timetable. An update paper will be tabled to the Local Plan Working Group at six monthly intervals and it will report on target dates, expected outputs, performance, risks, and variances.
- 8.3. After this initial period, monitoring and reviewing the LDS will revert to an annual process, with an update report tabled to the Local Plan Working Group every 12 months.