

INDEPENDENT EXAMINATION OF THE CASTLE CARY AND ANSFORD NEIGHBOURHOOD PLAN

EXAMINER: Jill Kingaby BSc (Econ) MSc MRTPI

Pek Peppin
Castle Cary and Ansford Neighbourhood Plan Working Group

Leisa Kelly
South Somerset District Council

Examination Ref: 01/JK/CCNP

Via email

15 February 2019

Dear Ms Peppin and Ms Kelly

CASTLE CARY AND ANSFORD NEIGHBOURHOOD PLAN EXAMINATION

Following the submission of the Castle Cary and Ansford Neighbourhood Plan ('the draft Plan') for examination, I would like to clarify several initial procedural matters.

1. Examination Documentation

I can confirm that I am satisfied that I have received a complete submission of the draft Plan and accompanying documentation, including the Basic Conditions Statement, the Consultation Statement and the Regulation 16 representations, to enable me to undertake the examination.

Subject to my detailed assessment of the draft Plan, I have not at this initial stage identified any very significant and obvious flaws in the Plan that might lead me to advise that the examination should not proceed.

2. Site Visit

I will inform you at a later date when I will undertake a site visit to the neighbourhood plan area. This visit will assist in my assessment of the draft Plan, including the issues identified in the representations.

The site visit will be undertaken unaccompanied. It is very important that I am not approached to discuss any aspects of the Plan or the neighbourhood area, as this may be perceived to prejudice my independence and risk compromising the fairness of the examination process.

3. Written Representations

At this stage, I consider the examination can be conducted solely by the written representations procedure, without the need for a hearing. However, I will reserve the option to convene a hearing should a matter come to light where I consider that a hearing is necessary to ensure the adequate examination of an issue, or to ensure that a person has a fair chance to put a case.

4. Further Clarification

I have set out in the Annex to this letter some initial questions seeking further clarification from the Neighbourhood Plan Working Group. I would be grateful if written responses can be provided within **two weeks** of receipt of this letter. It is possible that I may have further questions, following my site visit.

5. Examination Timetable

As you will be aware, the intention is to examine the Plan (including conduct of the site visit) with a view to providing a draft report (for 'fact checking') within 4-6 weeks of submission of the draft Plan. However, as I have raised some questions, and may have others following my site visit, I must provide the opportunity to reply. Consequently, the examination timetable will be extended. Please be assured that I will aim to mitigate any delay as far as is practicable. The IPE office team will seek to keep you updated on the anticipated delivery date of the draft report.

If the Parish Council or Local Planning Authority has any process questions related to the conduct of the examination, which you would like me to address, please do not hesitate to contact the office team in the first instance.

In the interests of transparency, may I prevail upon you to ensure a copy of this letter is placed on both the Parish Council and the South Somerset District Council websites?

Thank you in advance for your assistance.

Your sincerely

Jill Kingaby

Examiner

ANNEX

After reading the submitted Neighbourhood Plan and background documents, notably the responses to the Regulation 16 consultation exercise, I have a number of questions for the Neighbourhood Plan Working Group (NPWG). These are set out below:

1. Paragraph 1.4 of the Plan and the Consultation Statement refer to "numerous, largely supportive responses" to consultation carried out pre-submission in February 2018. How many responses exactly were received at that stage? Also, I have counted eight responses at the later Regulation 16 stage. Please would you confirm that that is correct?
2. Paragraphs 3.1a. & b. and Policies HOU1& HOU2 of the Plan have been criticised by respondents, including South Somerset District Council. Critics allege that the approach to restrict development in the 'Direction of Growth' area is not in general conformity with the adopted Local Plan, and not consistent with national planning policy to boost housing supply. It is pointed out that Policy LMT1 and paragraph 7.112 of the Local Plan expect at least 374 dwellings to be provided in Ansford and Castle Cary, 2016-28. This number is not intended to be restrictive or a ceiling to new development. How does the NPWG respond to these substantive objections?
3. Policy HOU1 of the Neighbourhood Plan suggests that there is a good supply of available brownfield sites which should be developed before the greenfield land in the Direction of Growth. Does the NPWG have evidence that development of all the brownfield sites would be viable, and that developers would not have to address constraints, such as contamination or proximity to heritage assets etc? Critics have pointed out that national planning policy does not support a sequential approach to identifying and delivering suitable housing sites (favouring brownfield ahead of greenfield sites).
4. Has the NPWG considered the following arguments in support of further new development in the Direction of Growth: (i) the Five Year Housing Land Supply Paper, August 2018, indicates that there is only about a 4 year supply of housing sites in South Somerset, so that new sites in locations identified as suitable in the adopted Local Plan should be brought forward? (ii) Policy HG2 of the Local Plan, seeking to provide 40% of new housing on previously developed land, could be seen as out-of-date? (iii) further development in the Direction of Growth area could help enhance permeability and connectivity across the area, and assist infrastructure provision?
5. Should the Neighbourhood Plan address monitoring, explaining how this will be carried out, and when the Plan should be reviewed? Should reference also be made to the emerging revised South Somerset Local Plan, which will operate until 2038?
6. Somerset County Council pointed out that a new primary school site has been selected (and planning permission granted – 15/0347/OUT), and it cannot agree that the existing primary school site should be expanded to meet future needs. The County Council's commissioning team has based its decision to develop a new site on feasibility studies. In view of this, and the additional up-to-date data supplied, should Paragraphs 10.2 to 10.10, Policies INF1 and INF2 and Policy DP1 be amended as proposed?

I request you to consider these questions, liaising with the District Council and County Council where necessary, and advise me as soon as possible of any modifications to the submitted Neighbourhood Plan which you would be willing to make. It would be most helpful to me if you would specify the revised wording for any policies or text which you would consider acceptable.