

Part of Neighbourhood Plan	Comment
Section 2.2	<p>The expectation for new developments to show strong SuDS schemes in Section 2.2, page 18 is supported, particularly due to the village being within an infiltration consultation area which poses a high risk of foul sewer inundation. There must be no surface water connections to the public foul sewer systems and SuDS features must be demonstrated to be effective during periods of high groundwater levels.</p>
POLICY QC1	<p>Neighbourhood plans are required to be “in general conformity with the strategic policies contained in any development plan that covers their area” (NPPF, footnote to Paragraph 29).</p> <p>In this respect, Policy SS5 sets out requirements for each of the settlements aimed at achieving the overall housing numbers required during the Plan period. The aspirational figure for Rural Settlements is 2,242 dwellings. This is not a maximum figure but rather an indication as to the broad level of housing to be provided. This has been accepted on a number of occasions in previous Appeal decisions within the District.</p> <p>The Preferred Options Consultation on the South Somerset Local Plan Review published June 2019 stated (paragraph 5.4) that “The Issues and Options consultation document identified that development in Rural Settlements has made a significant contribution to housing delivery in South Somerset and more homes have been delivered in these locations than the settlement strategy envisaged. Larger Rural Settlements appear to be the focus for most development but there are also significant commitments in other smaller locations.” The Plan therefore proposed the introduction of a ‘Villages’ category of settlement where a specific level of growth could be focused on more sustainable settlements and reduce the pressure on the smaller settlements.</p> <p>Paragraph 5.21 of the Preferred Options Consultation confirms that “The Villages do not have identified development areas but growth is expected to take place adjacent to the existing built settlement.”</p> <p>Paragraph 5.47 of the Preferred Options Consultation states that “Queen Camel is identified as a Village in the settlement hierarchy and, as such, its housing requirement falls within the Village’s overall target. The emerging neighbourhood plan is seeking to deliver around 2 to 2.5 homes per year, a total of 35-40 dwellings in the period 2018 to 2034. The Local Plan Review is proposing 1,314 new homes in Villages once the number of completions (as at 31st March 2018) and commitments (as at 31st March 2018) are taken away from that total. There remains 722 homes to be delivered. There are twelve Villages in total and when divided equally this equates to 60 dwellings per Village over the Local Plan Review Period of 2016-2036. Therefore, on this basis, there is a housing requirement of 60 dwellings for Queen Camel over the twenty year period, this would equate to 3 new homes a year.” This is affirmed in the draft Policy SS2.</p>

	<p>The proposal to restrict development in Queen Camel to about 30 homes over the Plan period is considered to lack conformity with the adopted Local Plan Policy SS5 (which proposes only an indication as to the broad level of housing to be provided), and with the emerging Local Plan Policy SS2. The Neighbourhood Plan makes provision for “a housing target of an average per year of about 2 to 2 ½ homes” which falls short of the emerging Policy requirement. It is noted that the Consultation Statement shows that the majority of residents (42%) “were not concerned about the actual level of further growth provided that the sites were acceptable”.</p> <p>The response in the published Neighbourhood Plan is that if the South Somerset Local Plan is adopted as proposed, the Parish Council will consider an early review of the Neighbourhood Plan to consider the revised housing target and changes to Local Plan policies, and the implications. This could be as early as 2021, which means that the Neighbourhood Plan, if adopted, could be considered up-to-date for only one year.</p> <p>It is therefore proposed that the Neighbourhood Plan should be amended to facilitate additional sustainable housing growth in accordance with the policy provision in the adopted and emerging Local Plans.</p> <p>Development Proposals</p> <p>The plan sets out under Policy QC1 ‘Housing’ a target of delivery of 1.9 to 2.4 dwellings per annum, which is derived from the South Somerset Local Plan target for rural settlements. This equates to up to 30 homes across the Plan period up to 2030. No specific quantum of land is identified for employment use, with relevant Policy QC6 ‘Business & Employment’ setting out that delivery of employment is likely to be achieved through extensions or alternation of existing business premises and the provision of new small scale business premises.</p>
POLICY QC2	<p>The proposal to designate a settlement boundary / development area lacks conformity both with the adopted South Somerset Local Plan Policy SS2 and with the emerging Policy SS2.</p> <p>Under the adopted Local Plan, Policy SS2 permits development “where it is commensurate with the scale and character of the settlement, provides for one or more of the types of development above, and increases the sustainability of a settlement in general. Proposals should be consistent with relevant community led plans, and should generally have the support of the local community following robust engagement and consultation. Proposals for housing development should only be permitted in Rural Settlements that have access to two or more key services....”</p> <p>The supporting text in paragraph 5.23 states that “Rural Settlements are considered as locations where there will be a presumption against development unless key sustainability criteria can be met... These settlements will no longer have identified development areas and will be considered to be within the open countryside for planning purposes.”</p> <p>Paragraph 5.24 confirms that “This approach does not preclude development; indeed the NPPF promotes sustainable development in rural areas, with housing and employment to be located where it enhances or maintains the vitality of rural communities.”</p> <p>As noted in the preceding section of this Statement, the Preferred Options Consultation on the South Somerset Local Plan Review published June 2019 identifies Queen Camel as a Village in the settlement hierarchy. Paragraph 5.21 of the Preferred Options Consultation confirms that “The Villages do not have identified development areas but growth is expected to take place adjacent to the existing built settlement.”</p> <p>Both the Local Plan and the National Planning Policy Framework set out a presumption in favour of sustainable development. The NPPF (paragraph 13) states that “The application of the presumption has implications for the way</p>

	<p>communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.”</p> <p>The identification of a settlement boundary for Queen Camel is directly contrary to the adopted and emerging Local Plan policies where Rural Settlements and Villages respectively should not have identified development areas. It is noted that the proposed settlement boundary is drawn tightly around the extant built up limits of the village and that areas such as Hill View / West View, South View and Wales have been deliberately excluded. The opportunities for infill development within the settlement boundary will therefore be very limited, as was recognised by some respondents to the earlier consultation exercise.</p> <p>The identification of a settlement boundary will frustrate otherwise acceptable developments that may be located on suitable and sustainable sites outside the identified area, which would satisfy the policies of Local Plan SS2, and could provide appropriate housing or other development to meet the needs of the community and the wider District. It is therefore proposed that the Neighbourhood Plan should be amended to remove the proposal for a settlement boundary, and to make provision for appropriate housing and other development on sites that are suitable, sustainable, and otherwise in conformity with the adopted and emerging Local Plans.</p>
Policy QC3	<p>This site has apparently been selected as it is considered to be the most suitable by local residents. However, from the feedback reported in the Consultation Statement it is apparent that this view is influenced heavily by two factors; firstly, that development will have less direct impact on respondents, and second, that the site offers recreational benefits that tipped the balance in favour of housing development in this location.</p> <p>However, this site has a number of disadvantages that weigh heavily against it being the preferred location for development in planning terms. This includes:</p> <p>Location – the Consultation Statement noted that the site is “Not well-related to the village core, as separated by the playing field area..” The land is poorly related to the existing built form of the settlement, being physically separated from the main part of the village with open land between, and has poor connectivity to the services in the centre of Queen Camel.</p> <p>Highways – the Consultation Statement notes that “West Camel Road would need to be widened to a minimum width of 5.5m from the western end of the school frontage across the whole site frontage. There appears to be insufficient frontage to West Camel Road to set out an appropriate means of access incorporating the necessary geometric layout and extent of visibility splays. This could be a very significant constraint with this site.” It was further noted that “vehicular access could be a problem if the landowner is unable to negotiate access via Roman Way.”</p> <p>Landscape impact – the Consultation Statement noted that “Its westward projection and open aspect would have a moderate level of visibility in the local landscape, and have little association with existing built form.” Consultation responses have confirmed that the landscape capacity for development is moderate to low.</p>

	<p>Heritage - the site of a Roman Villa lies within the eastern portion of the field identified for housing, and on land to the west. This archaeological find is currently classified as of local interest, but potentially of national interest. It is likely that further investigation and mitigation will be required involving excavation of any remains prior to the site's development.</p> <p>A planning application for up to 43 dwellings at this site is presently under consideration by South Somerset District Council (ref. 19/01830/OUT). This application is for significantly more homes than proposed in the draft allocation and the outcome for the application remains uncertain.</p> <p>The proposal to allocate one large site to deliver the total housing proposed for Queen Camel over the Plan period is considered to be an over-reliance on this site being developed in a timely manner. There are a number of constraints and uncertainties relating to this land, that have yet to be determined either through the Neighbourhood Plan or planning application processes.</p> <p>It is also noted that in the statutory pre-submission (Regulation 14) consultation in 2019, there were more objections than support expressed for both of the housing sites proposed at that time (to the south of Sutton Montis Road, and the present allocation to the north of West Camel road).</p> <p>Other sites in Queen Camel are potentially available, including those identified in the Neighbourhood Plan process, and others. These sites may be equally or better suited to development than the draft allocation on the north side of West Camel Road [<i>a further site is proposed in this submission</i>].</p> <p>The land off Englands Way (identified as site E in the Neighbourhood Plan consultation process) is the subject of a current planning application for 9 homes.</p> <p>No constraints on development have been identified during consultation on the planning application, in terms of highways, landscape, ecology, flood risk, archaeology or otherwise. The land is well related to the existing built form, and represents an opportunity for strategic landscape planting to soften the current hard urban edge of the village, particularly when viewed from the Leland Trail footpath. The Consultation Statement notes that local residents did not favour this site, "although no notable constraints would suggest it should not be developed". It is further stated that "...Site E performs comparably if not slightly better from a sustainability perspective [than Site D]..."</p> <p>Further consideration should be given to the planning merits of this and other alternative sites in preference to the land on the north side of West Camel Road, which has obvious constraints for development.</p> <p>It is therefore proposed that the Neighbourhood Plan should be amended to omit the allocation for land on the north side of West Camel Road, and to propose alternative, smaller, allocations that are better suited for development in planning terms, with fewer identified constraints, and which would be genuinely deliverable over the Plan period.</p> <p>Policy QC3, page 35 allocates "Land to the north side of West Camel Road" for 30 dwellings. A Wessex Water 150mm public gravity foul sewer draining north is already present within this site. Minimum sewer protection easements of 3m either side of the sewer should be considered when designing the site layout.</p>
Policy QC12	<p>Policy QC12, page 58 designates several areas as Local Green Spaces and development within or immediately adjoining them must not harm their reason for designation. Wessex Water has existing apparatus passing through the Local Green Spaces, particularly The Playing Field and Ridge Copse. This policy must not constrain maintenance or improvement programmes, which are critical for the efficient and safe operation of Wessex Water services. This policy</p>

	must not constrain maintenance or improvement programmes, which are critical for the efficient and safe operation of Wessex Water services.
Transport	<p>As referenced in section 2.3 of the draft Neighbourhood Plan, the Highways England Sparkford to Ilchester dualling scheme which is seeking to improve the network and junctions along the route of the A303 is currently going through the Development Control Order (DCO) process and associated examination. The Plan acknowledges that this will enhance the opportunity for sustainable travel between the northern and southern sections of the Parish, through provision of safer crossing points for pedestrians and cyclists.</p> <p>In summary, we are satisfied that the plan's proposed policies are unlikely to result in development which will adversely impact on the SRN and we therefore have no other specific comments to make. However, this does not prejudice any future responses Highways England may make on site specific applications as they come forward through the planning process, and which will be considered by us on their merits under the prevailing policy at the time.</p>
Allocations	Historic England have expressed the view that adequate conservation advice should be taken into account in informing the evidence base.