

**WYKE FARMS LTD & ANDREW HOPKINS CONCRETE LTD**  
**LAND NORTH OF ANSFORD HILL, ANSFORD, CASTLE CARY**  
**SOMERSET, BA7 7PD**

**PUBLIC INQUIRY: 9-12 AND 24 NOVEMBER 2021**

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**THE OPENING SPEECH OF THE APPELLANTS**

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**Section 1 – Introduction**

1. It is never popular seeking new housing. Particularly on Greenfield land. But the simple truth is that we have a national crisis in the provision of housing and this needs to be addressed as a matter of urgency.
2. This is not an academic need, but affects real people and in particular those in need. There are many sectors of our society who simply cannot afford a property which is a terrible indictment of our society frankly.
3. This is an LPA who on their own figures need to provide 725 houses a year or 3625 houses in the next five years – that is a very significant number and both parties agree can only be achieved by building significant elements of that requirement on greenfield land.
4. Therefore the fundamental question facing this inquiry is not if, but where and is this the right site to meet the Government’s overriding aspiration for the planning system to significantly boost the supply of housing.
5. That is even more pressing and relevant when an LPA has just this year been found to have a land supply 3.66-3.97 years at appeal.<sup>1</sup>
6. The appeal is against South Somerset DC’s (“SSDC”) refusal of outline permission for 200 dwellings, including 70 affordable dwellings, at the Site.
7. There is only one ground of refusal:

*“01. The development, by reason of its scale and location, represents a visually obtrusive encroachment beyond the town's obvious physical and topographically*

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<sup>1</sup> Templecombe, CD-B-15

*informed limits and into the open countryside, to the detriment of local and landscape character. This harm would significantly and demonstrably outweigh the benefits of the proposal and would be contrary to policies SD1, SS1, SS5, EQ2, EQ3, LMT1 of the South Somerset Local Plan (2006-2028), policy DP1 and the aims and objectives of the Castle Cary and Ansford Neighbourhood Plan (2019), and the provisions of the NPPF.”*

8. As we will show, this simply cannot justify refusing this application.

## **Section 2 – The context of the appeal**

9. There are four striking aspects to this appeal.

10. First, this administrative area is in desperate need of new homes. It is common ground that the LPA does not have a 5 year housing land supply. Thus the need for more housing is undisputed, and all parties agree that the tilted balance is engaged.<sup>2</sup>

11. Secondly, the area has an acute need for affordable housing. The policy-compliant 35% affordable homes contained in the proposal is something which any reasonable LPA would welcome.

12. Third, the nature of the Appellants. These are local companies – a cheese maker and farmer/concrete manufacturer. If you drive around this area you will - probably have - seen Wyke Farm sign after Wyke Farm sign, or cement mixers bearing the Andrew Hopkins logo. As you approach this venue you will have seen the signs referring the “the developer”. But the Appellants aren’t land speculators, HQ’d elsewhere, who can’t tell their Castle Cary from their Shepton Mallet. These Appellants are embedded in this community, they are employers in this community, and they care about this community.

13. Fourth, and in some ways most concerningly, is SSDC’s own conduct so far. We have, at the CMC, already ventilated issues of unreasonable conduct regarding SSDC’s approach to housing land supply. However, in light of recent developments SSDC’s poor conduct is most clearly highlighted by its recent, abrupt, and entirely unnotified change of case on landscape character and appearance. We have attached a full chronology to this opening and Ms Brockhurst deals with a number of changes that have occurred,<sup>3</sup> but if we can focus on this new suggestion of valued landscape which should be considered in the context that valued landscape was a concept that was set out in the earliest versions of the NPPF so it is nothing new and yet it has

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<sup>2</sup> See Mr Roach POE para 4.66, Mr Wallace POE para 2.6

<sup>3</sup> MS Brockhurst Rebuttal POE Section 2 and 3

only been alleged now to give ballast to the LPA's case. Frankly it appears utterly expedient when one considers the timeline that:

- 13.1. This application was submitted in June 2019 with an LVIA which made no assertion that the land was valued.
- 13.2. The LVIA was reviewed by LDA in February 2020.<sup>4</sup> There was no suggestion that the landscape *was* a valued landscape in NPPF para. 170a terms, merely that there were some valued features on site and the wider landscape *could be*.
- 13.3. The Officer's Report was compiled in May 2020. There was again no mention in that the site was a valued landscape in NPPF terms, only a reference to Policy EQ2 (character and appearance). The basis of the objection was framed in terms of the effects of the development on the character and appearance of the countryside directly, only referencing Policy EQ2. The conclusions section does mention para. 170 NPPF but in the context of the Officer's Report, this appears to have only related to character and appearance rather than NPPF Para. 170a.
- 13.4. The decision notice was issued in June 2020. The single reason for refusal does not mention valued landscape or specifically para. 170a NPPF, it only says "provisions of the NPPF".
- 13.5. The Appellants' hearing statement on 02 December 2020 addressed the single Reason for Refusal, and did not discuss whether this was a valued landscape. Of course it didn't – that had not been put in issue.
- 13.6. On the back of this, in March 2021, SSDC provided what should have been its full statement of case. This made no mention that there was a valued landscape in NPPF para. 170a terms.
- 13.7. Mr Crawford states he was instructed when the dates for this inquiry were fixed.<sup>5</sup> That is post 8 June 2021. There was then no mention at the CMC in August 2021 that SSDC would be arguing this is a valued landscape.
- 13.8. Thereafter, on 18 October 2021:

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<sup>4</sup> CD-L-02

<sup>5</sup> Crawford POE para 3.2.1

13.8.1. SSDC signed the SOCG, which states in terms that no formal assessment been made of 'valued landscapes' in NPPF terms within a District-wide or local context, and that there are some local features of wildlife, landscape, and heritage interest in and around the site. It does not list whether the landscape is a valued landscape as an area of dispute.

13.8.2. Mr Crawford's proof of evidence is provided. Here, and only here, do we see a proposed elevation of the site to an NPPF valued landscape although the site had been assessed and considered by the LPA for a very considerable period without any such assertion.

14. This is, frankly really poor conduct from SSDC, which can only have been undertaken with the intention of seeking to bolster its case and ambush the Appellants who have been embroiled in this process for years.

### **Section 3 - The proposal and its benefits**

15. The proposed scheme includes a wide array of significant planning benefits for the local area. These include<sup>6</sup>:

15.1. The provision of 200 dwellings in an area where there is a substantial unmet need;<sup>7</sup>

15.2. The provision of a policy-compliant level of affordable housing;<sup>8</sup>

15.3. The economic benefits of the appeal proposals, through direct and indirect employment, increased patronage to local shops and services;<sup>9</sup>

15.4. Social benefits, through the provision of public open space, the enhancement pedestrian and cycle routes, and financial contributions;<sup>10</sup>

15.5. Direct on-site environmental benefits including the ability to deliver biodiversity net gain;

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<sup>6</sup> Per Roach POE para 5.1-5.9

<sup>7</sup> Roach POE para 5.1 Wallace POE para 9.1

<sup>8</sup> SoCG para 7.23

<sup>9</sup> Note too Wallace POE para 9.3

<sup>10</sup> Note too Wallace POE para 9.3 accepts there will be social benefits.

- 15.6. The ability of the proposals to achieve phosphate nutrient neutrality, in circumstances where 11,000 homes across Somerset cannot be delivered due to phosphate impacts;
- 15.7. The fact the appeal site is in a highly sustainable location, reducing reliance on the private car;
- 15.8. The benefit of developing in a settlement identified as suitable for development in the local plan, compared with potentially less suitable locations elsewhere.

#### **Section 4 – The Appeal site**

16. The appeal site is 9.76ha located to the north of Ansford Hill, east of Station Road, and south of Castle Cary railway station and railway lines. It consists of two fields – a larger field used for arable land is owned by Wyke Farms Ltd, a smaller field of semi-improved grassland owned by Andrew Hopkins Concrete Ltd.<sup>11</sup>
17. It is close to the railway station. The village of Ansford is located to the south east of the site. Castle Cary is located to the south. (Ansford and Castle Cary both are physically connected and treated as one in the South Somerset Local Plan).<sup>12</sup>
18. Ansford/Castle Cary (“A/CC”) is a Local Market Town within the Settlement Hierarchy. Even with a growth in population occasioned by consented dwellings and this proposal, it will still have a population below some market towns, and well below the next highest settlement tier, Primary Market Towns. However, it has delivered more employment land between 2006 and 2020 than any other Local Market Town, Primary Market Town, or Strategically Significant Town. It currently has 1,400 jobs for 1,464 residents in employment, indicating a fairly high level of self-containment.<sup>13</sup>
19. The site does not fall within a National Park, AONB, Heritage Coast, or Registered Historic Park and Garden. Local landscape designations do not currently exist in the District, and no formal designation has been made of ‘valued landscapes’ in the context of the NPPF within a District-wide or local context.<sup>14</sup> Nor is the site subject to any statutory designations for historic environment protection.<sup>15</sup>

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<sup>11</sup> SoCG Section 1

<sup>12</sup> SoCG para 2.2

<sup>13</sup> See Roach POE 4.01-4.29

<sup>14</sup> SoCG para 7.25-7.26

<sup>15</sup> SOCG para 7.31

## **Section 5 – The planning policy framework**

20. The development plan consists of the South Somerset Local Plan 2006-2028 (2015), the Castle Cary and Ansford Neighbourhood Plan 2016-2028 (2019).<sup>16</sup>
21. The full list of relevant policies is set out in the SoCG at Section 5. Importantly, a number of the key policies relevant to the appeal are out of date, because of the lack of a five year housing land supply (“5YHLS”). There is agreement that policies SS1, SS5 and LMT1 are out of date.<sup>17</sup> We say the out of date policies also include Local Plan Policies SS2, SS4 and Neighbourhood Plan policy HOU2.
22. It is agreed that the emerging South Somerset Local Plan Review is a material consideration which should be accorded limited weight due to its early stage of preparation.<sup>18</sup>
23. Turning to national policy, NPPF para 11 contains the “tilted balance”, which (where it is engaged) requires permission to be granted for a proposal unless the adverse impacts of the grant of permission would significantly and demonstrably outweigh the proposal’s benefits. All parties agree that the tilted balance applies to this scheme, because the absence of a five year housing land supply renders the key development plan policies out of date.<sup>19</sup>

## **Section 6 – Matters of agreement**

24. There is significant agreement between the Appellants and SSDC in this case. The matters of agreement are contained primarily in the SoCG – see in section 7.
25. In particular, it is notable that, of the 23 relevant development plan policies, it is common ground that there is a dispute solely about whether the scheme complies with seven of them.<sup>20</sup> The remainder are not in issue.
26. Other matters of agreement include:

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<sup>16</sup> SoCG para 5.1

<sup>17</sup> Roach POE para 4.63 and Wallace POE para. 10.1

<sup>18</sup> SoCG para 6.2

<sup>19</sup> See Mr Roach POE para 4.66, Mr Wallace POE para 2.6

<sup>20</sup> SoCG para 8.1

- 26.1. That SSDC cannot demonstrate a 5YHLS<sup>21</sup> and is under-delivering homes against its minimum local plan requirement<sup>22</sup> - though the precise level of the Council's 5YHLS is a matter of disagreement.
- 26.2. That, subject to matters which can be secured by condition, the proposal complies with development plan policies relating to:<sup>23</sup>
- 26.2.1. Transport and access (Local Plan Policies TA1, TA4 and TA5 and Neighbourhood Plan Policy TRA1);
- 26.2.2. Drainage and flood risk (Local Plan Policies EQ1 and EQ7);
- 26.2.3. Ecology (Local Plan Policies HW1, EQ4, EQ5 and EQ6, and Neighbourhood Plan Policy ENV1);
- 26.2.4. Noise, air quality, and ground contamination (Local Plan Policy EQ7);
- 26.3. That, although the land falls within the Somerset Levels and Moors Ramsar Site catchment, the Appellant has prepared a bespoke phosphate mitigation strategy which will deliver the required mitigation; the SSDC's ecologist has prepared an Appropriate Assessment on that basis which is approved by Natural England.<sup>24</sup>

## **Section 7 - Areas of dispute**

27. There are four main issues for resolution at this inquiry, which are as follows<sup>25</sup>:
- 27.1. The extent of the HLS shortfall;
- 27.2. The weight attributed to the delivery of homes on the appeal site;
- 27.3. The degree to which the proposed development will adversely impact landscape character, visual amenity and the landscape setting of A/CC, including the extent to which proposed mitigation would be effective in reducing these impacts over time; and

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<sup>21</sup> SOCG para 7.11

<sup>22</sup> SOCG para 7.12

<sup>23</sup> See SoCG paras. 7.33-7.39

<sup>24</sup> SoCG para 7.54

<sup>25</sup> SoCG section 8

- 27.4. Compliance of the Development with Local Plan policies SD1, SS1, SS5, LMT1, EQ2, EQ3 and Neighbourhood Plan Policy DP1.

### The extent of the HLS shortfall

28. SSDC has only been able to show a 5YHLS for four months of the last nine years.<sup>26</sup>In the *Templecombe* decision SSDC was found to have between 3.97 and 3.66 YHLS.<sup>27</sup>
29. SSDC now claims it can show a 4.6YHLS, following publication of its Five Year Housing Land Supply Paper<sup>28</sup> and discussions with the Appellant's team.<sup>29</sup>
30. As Mr Richards shows, this masks the true extent of SSDC's shortfall, as it wholly fails to take into account past under-delivery. If assessed against SSDC's Local Plan figure, and past under-delivery is taken into account, SSDC only has a 3.45YHLS – a shortfall of over 1,500 homes.<sup>30</sup>
31. Moreover, SSDC has been in an almost constant state of under-delivery for the plan period, with a current supply of only 2.8 years (a shortfall of 2,142 homes).<sup>31</sup>

### Weight attributable to delivery of homes on the appeal site

32. Somewhat shockingly, against that abysmal shortfall in 5YHLS, Mr Wallace suggests that the weight to be afforded to the developments benefits to the housing stock are only “medium-significant”.<sup>32</sup> This appears, in part, to be because he does not consider we have shown a need for affordable housing in A/CC specifically.<sup>33</sup>
33. This country is in a housing crisis. There is a national shortage of both market and affordable housing. It is a national scandal.<sup>34</sup> The Government recognises this. There is no shortage of reports and releases where it emphasises the national housebuilding imperative.<sup>35</sup> This is reflected in national policy.<sup>36</sup>

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<sup>26</sup> Richards POE para 5.11

<sup>27</sup> CD-B-15 para. 44

<sup>28</sup> CD-C-06

<sup>29</sup> See the SOCG paras 7.5-7.11.

<sup>30</sup> Richards POE para. 8

<sup>31</sup> Richards POE para 6.3 Table JRT2

<sup>32</sup> Wallace POE para. 9.2

<sup>33</sup> Wallace RPOE para 3.12

<sup>34</sup> Stacey POE para iv, 3.19

<sup>35</sup> See e.g. Stacey POE Executive Summary iv ff

<sup>36</sup> See paras



34. SSDC's supply and delivery levels of housing generally are poor, and have been for many, many years. Its affordable housing past delivery<sup>37</sup> and future commitments are particularly feeble. The published figures on which Mr Stacey assessed affordable housing need, based on the 2016 SHMA, were bad. One inspector had indeed described SSDC as "failing abysmally to meet the established need",<sup>38</sup> and we say that is manifestly right. However, the picture gets worse: two assessments<sup>39</sup> published the day after proofs were due more than doubles the affordable housing need Mr Stacey assessed.<sup>40</sup> The "Okay, we need it somewhere, just not here" approach might be understandable for NIMBY's, but lies ill in the mouth of a local authority which is so miserably failing to meet its targets.
35. In those circumstances, to seriously attempt to suggest that the delivery and provision of 200 dwellings including 70 affordable homes should receive anything other than significant, or very significant weight respectively, is risible.

#### Landscape and visual impact

36. Quite properly, you will best judge this on site, with plans in hand. In this outline application, much of this case concerns an issue of principle, rather than a focus on the precise degree of landscape change. Ms Brockhurst outlines in detail why the principle of development is acceptable here, and notes that it has been considered acceptable in SSDC's own evidence base.
37. SSDC's case on this is remarkable for all the wrong reasons.
38. First, it misconstrues Ms Brockhurst's evidence.<sup>41</sup>
39. Second, it has undergone some significant changes in the weeks before this inquiry:
- 39.1. On landscape character, SSDC has gone from accepting that the appeal site is best classified as being within the Upper Cary Vale, to Mr Crawford now suggesting it forms part of a new Brue Valley landscape component. We don't accept this. We also don't think much turns on it. Ultimately, the key issue is

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<sup>37</sup> See Stacey POE Figs 6.4, 6.5, 6.6 and Executive Summary paras. xvi and xvii

<sup>38</sup> CD-B-02 para. 75

<sup>39</sup> The South Somerset and Somerset West & Taunton Councils: Local Housing Needs Assessment 2020 (August 2021) and the South Somerset District Council: Local Housing Needs Assessment 2021 (October 2021)

<sup>40</sup> See the note prepared by Mr Stacey dated 8.11.21. The SSDC Local Housing Needs Assessment identifies a need for 475 affordable dwellings per annum, the South Somerset and Somerset West and Taunton Council assessment identifies an annual need of 582 per annum. In either case more than double the 206 per annum figure identified by Mr Stacey from the 2016 SHMA.

<sup>41</sup> Brockhurst RPOE section 4

how the development within the appeal site affects the character of the landscape – whatever characterisation is relied on.

39.2. We have outlined already how SSDC is now, first the first time, suggesting this is a valued landscape. There is no good reason for this late-stage change. It is also a weak case: Mr Crawford’s analysis – whilst voluminous – is actually lacking in substance and wrong in outcome – as Ms Brockhurst sets out in great detail.<sup>42</sup> In any case, even if Mr Crawford is right, the landform is still evident, the vegetative features retained, enhanced and supplemented, the development can deliver greater accessibility to the upper part of the slope and protect views of the river valley and Glastonbury Tor, and retain the open setting to the station.

40. Third, it seems to rely on SSDC undermining its own evidence base, and with that the views of its own landscape officer and Conservation and Design Unit. We don’t say those assessments are perfect and Ms Brockhurst lays out flaws in them. But it is really something when an LPA has to bolster its case by complaining about its own documentation.

#### Compliance with Local Plan Policies SD1, SS1, SS5, LMT1, EQ2, EQ3 and Neighbourhood Plan Policy DP1

41. Expansion here would comply with Policy SS1. A/CC is already remarkably self-contained, and can be expanded without compromising that self-containment or the settlement hierarchy, and (given its proximity to the railway station) this can be done with minimal reliance on the car.<sup>43</sup>

42. It is also consistent with LMT1. That policy says the “Direction of Growth” for housing, employment and education is land north of Torbay Road and East and West of Station Road.”<sup>44</sup> This location falls within that wording. SSDC relies on the fact that the site is not touched by brown lines in the accompanying plan.<sup>45</sup> We say that approach is wrong, and not supported by previous appeal decisions.<sup>46</sup>

43. Policy SS5 establishes a requirement of 15,950 dwellings in the plan period, 374 from A/CC. It is common ground this is a minimum not maximum figure.<sup>47</sup> If we are right

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<sup>42</sup> Brockhurst RPOE section 3

<sup>43</sup> See Roach POE 4.01-4.29

<sup>44</sup> CD-A-01 p. 95

<sup>45</sup> Wallace POE paras 7.17-7.21

<sup>46</sup> Roach POE para 4.30-4.36

<sup>47</sup> Roach POE para 4.48 and Wallace POE para 714.

the Site falls within A/CC it is in accordance with this policy. SSDC only argues that Policy SS5 is breached on the basis that the site does not fall within A/CC.<sup>48</sup>

44. For the reasons set out above in the landscape section, we will show the proposals comply with Local Plan Policies EQ2 and Neighbourhood Plan Policy DP1.
45. We do not accept the is conflict with policy EQ3 on heritage matters. SSDC's case is based on the Headland Archaeology Report, which suggested that the development would impact on the setting of the non-designated heritage asset train station, and the total loss of the turnpike road.<sup>49</sup> Neither is unsurmountable – significant open space can be left in front of the train station and the report acknowledges impacts on the turnpike can be appropriately mitigated.<sup>50</sup> In any case both planning witnesses accept any harm, if found, is outweighed by the benefits of the scheme.<sup>51</sup>
46. In light of all of the above, the proposal complies with the Local Plan and so Local Plan policy SD1.<sup>52</sup> In the alternative, the relevant plans of the Local Plan are out of date, and so Policy SD1 requires granting permission nevertheless.

### **Section 8 – The planning balance**

47. Drawing those threads together, we will show that the proposal complies with the development plan overall.
48. Additionally, the benefits of the scheme are so significant as to outweigh the minor harms which arise from it.
49. Even if you conclude that the proposal is not accordance with the development plan, these benefits outweigh that non-compliance.
50. Thus even if the balance were not tilted, permission should be granted. In fact, the balance is tilted in favour of grant, and SSDC simply cannot show that the asserted ill-effects of the scheme “significantly and demonstrably” outweigh its benefits.
51. The planning case for the scheme is overwhelming, as we will demonstrate.

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<sup>48</sup> Wallace POE para 7.15

<sup>49</sup> Summarised in IR POE para 6.36 and Wallace POE para 7.36.

<sup>50</sup> CD-L-03 p. 6-7

<sup>51</sup> Roach POE para. 6.38, Wallace POE para 9.10

<sup>52</sup> Roach POE para 8.14

**9 November 2021.**

**SASHA WHITE Q.C. and NICK GRANT  
LANDMARK CHAMBERS**

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## APPENDIX 1 – CHRONOLOGY OF KEY DATES

Date	Event	Ref	
10.93	Landscape of South Somerset	CD-A-12	
03.08	Peripheral Landscape Study – Castle Cary/Ansford	CD-A-13	
03.15	South Somerset Local Plan (2006-2028) adopted	CD-A-01	
10.18	Pre-application advice request made by A to SSDC	CD-I-14	
28.11.18 – 04.12.18	Various emails and memoranda provided by SSDC and Somerset County Council regarding documentation to be included in eventual application, including railway noise assessment, full transport assessment, and landscape and ecology management plan		
04.04.19 – 07.06.19	Further engagement between A and SSDC/SCC. Information provided on formal and informal public open space requirements, affordable housing % and tenure split, s. 106 education contributions, and (absence of) archaeology interest on site		
29.03.19	Formal request for EIA Screening Opinion Made		
04.19	Request and response from Wessex Water regarding foul drainage network		
23.04.19	Discussion with Network Rail on site		
01.05.19	A holds meeting with representatives of Ansford Parish Council and Castle Cary Town Council		
	Advertising begins for Public Information Event at Caryford Community Hall		
03.05.19	Advertisement for Public Information Event placed in Blackmore Vale		
15.05.19	Public Information Event held at Caryford Community Hall		
25.06.19	SSDC confirms ES not required.		
28.06.19	Application made, including documents sought by SCC/SSDC at pre-application stage		CD-I-01ff
09.19	Castle Cary and Ansford Neighbourhood Plan (2016-20128) adopted <sup>53</sup>		CD-A-04
4.10.19	Ecology Addendum Report submitted by A		CD-K-01
16.10.19	Section 106 Draft HoT Rev 1 submitted by A		CD-K-02
16.10.19	Travel plan Rev 1 submitted by A		CD-K-03
20.11.19	Acoustic Consultant Report (Railway Noise) submitted by A		CD-K-04
04.03.20	Transport Assessment Addendum submitted by A	CD-K-05	

<sup>53</sup> The document suggests it is modified for submission to local referendum in June 2019. The SOCG (para 5.1) confirms it was made in September 2019.

11.02.20	Ecology Tree Inspection submitted by A	CD-K-06
03.03.20	Walking, Cycling and Horse-Riding Assessment Review (Commissioned by SSDC)	CD-L-01
16.03.20	Review of LVIA (Commissioned by SSDC)	CD-L-02
27.04.20	Heritage Assessment (Commissioned by SSDC)	CD-L-03
13.05.20	Officer's Report	CD-A-09
13.05.20	Meeting of Area East (Informal)	CD-A-10
15.06.20	Refusal decision notice	CD-A-11
18.09.20	A lodges Appeal	
09.10.20	PINS determines case to be hearing	
02.12.20	Appellant's hearing statements provided to PINS, covering: Landscape Planning Affordable Housing Housing Delivery and Supply	CD-G-01 CD-G-02 CD-G-03 CD-G-04
30.03.21	LPA provides hearing statements (NB- mis-dated July 2021)	CD-G-05
08.06.21	PINS re-determines the procedure as inquiry	
15.06.21	Inquiry set for 12 October 2021	
21.06.21	Inquiry dates re-set for 09 November due to availability	
05.08.21	CMC	
18.10.21	LPA's proofs of evidence: Crawford (Landscape and Visual Impact) Wallace (Planning) A's Proofs of evidence: Stacey (Affordable Housing) Richards (Housing Supply and Delivery) Brockhurst (Landscape and Visual Impact) Roach (Planning)	
19.10.21	SSDC publish: (1) South Somerset and Somerset West & Taunton Councils: Local Housing Needs Assessment 2020 (2) South Somerset District Council: Local Housing Needs Assessment 2021	
25.10.21	LPA Rebuttal Evidence Wallace (Housing Land Supply and Affordable Housing)	
01.11.21	A's Rebuttal Evidence Brockhurst (Landscape and Visual Impact)	