

## Submission to inquiry inspector by Graham House on behalf of Castle Cary & Ansford Neighbourhood Plan Group

1. I am a retired professional planner, and have lived in Castle Cary for nine years. I was invited to join the NP group in 2017, and was subsequently involved in all the statutory stages of plan preparation and submission including the examination and referendum.
2. Para 15 of the NPPF tells us that “the planning system should be genuinely plan-led”. The system places primary reliance on the development plan. Our development plan includes the recently made CC+ANP, on which local residents spent much time and effort, in the hope and reasonable expectation that such effort would be rewarded through consistent operation of the statutory decision-making process, which would help us to ensure that our adopted vision became a reality.
3. Some background and context for the NP may be helpful for you, Madam: as you are aware, NPs are intended to fill in some of the gaps and describe the way forward at a local level in greater detail than the more strategic approach of the LP. This could have been the approach taken by our NP but matters were substantially taken out of our hands by the submission of several major planning applications well before we could prepare the plan. Once the LP had been adopted (in 2015), showing the Direction of Growth (DofG) in a broad strategic way, we had hoped that it would be followed by further planning documents setting out in more detail the way in which development of this area – a major urban expansion for Castle Cary and Ansford - might proceed, possibly a masterplan of some kind which could have included phasing requirements for the sequential release of sites, together with guidance to developers on matters such as pedestrian and cycle links to the town centre, wildlife corridors or important views. Unfortunately, none of this was to occur and instead, starting only weeks after the adoption of the LP, we were faced with a series of unrelated planning applications for development of different sites in the DofG. These were all determined favourably, at application or appeal, without any real reference to a

clear idea of how they might together become a meaningful expansion of the town.

4. The outcome was that, by the time we were able to make significant progress on a Neighbourhood Plan in 2017, permissions had already been granted for development of almost 500 houses on five large sites covering a substantial proportion of the DofG. Overall, by the time the NP was in a form ready for submission to SSDC, there were commitments for a total of around 650 new dwellings, very substantially more than the minimum requirement of 374 demanded by the Local Plan. Consequently, much of what the NP might have been able to achieve, in terms of positive planning within the DofG and directing development in ways which would meet local needs, was no longer possible. At the same time, there were several large brownfield sites in the town which had remained undeveloped for many years and which we wanted to prioritise for development before the release of further irreplaceable green-field land.
5. Against this background, of undeveloped brownfield sites and developers clamouring to build on greenfield sites many more houses than had been anticipated, the approach of the NP was to say: "We understand the need for more housing, but we already have permissions for almost twice as many as the minimum requirement, so let's just hold on a minute until we see how we cope with those." In planning terminology, policy HOU2 is worded to require a **pause** in permitting developments in the Direction of Growth so that we can assess the impact of the development schemes which have been permitted, and allow the provision of new infrastructure to catch up, before deciding where and when any further development might be permitted.
6. The wording of this policy is in the form recommended in May 2019 by the independent examiner, who unequivocally supported our approach and noted that it was consistent with the advice of para 16 of the (then) NPPF which encourages neighbourhoods to *"plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan"*.

7. The NP finally reached the stage of being "made" and becoming part of the development plan in September 2019. So we now have a clear and independently supported development plan policy which requires a pause in the granting of permissions, with the specific aim of making sure we have a chance to review how the town has fared as a result of the construction of the houses already committed. At the time of preparing the NP, the figure was some 650 in all, representing an increase of nearly 40% since 2011. By way of more recent confirmation, using a slightly different approach, Mr Roach's proof of evidence includes Table 4.1, which shows the population of Castle Cary & Ansford increasing from 3,308 (in 2019) to 4,920 as a direct result of permissions already granted. This represent a proportional increase of 49%, far in excess of the figure for any other settlement in the district.
8. The prospect of a 49% population increase is a very significant concern for a small town and we simply don't know how the schools, the town centre, the doctors, the dentists, the roads, the car parks and all the other facilities in our town will cope with an increase on that scale. That's why the NP requires a pause – so we can understand what the effects of 650 new houses have been before we decide if any more are acceptable.
9. The need for a pause must clearly apply to any and all development sites outside the defined development area, including those such as the present appeal site which fall outside the Direction of Growth. I acknowledge that Policy HOU2 does not explicitly apply outside the DofG, but it is evident that if this appeal were to be allowed, the development of 200 dwellings on the edge of Ansford and Castle Cary would bring further unknown pressures on local facilities and would undermine the fundamental objective and purpose of the policy, which is to bring about a pause in development here.
10. On the question of whether the NP policy can be regarded as "up-to-date", I draw attention to the important point that HOU2 was drafted and approved in the full knowledge of the absence of a 5-year supply of housing land. At the time of preparation of the NP, the housing land supply in SSDC stood at around 4 years (and was duly noted as such in the examiner's report at para 4.13). The available data suggests that while the supply is still less than 5 years, it is now greater than when the policy was adopted. I therefore submit that it is still appropriate to give full weight to a policy prepared and approved in the full knowledge of a land supply less than 5 years; it should not be regarded as "out-of-

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date” and the weight to be given to it should not be diminished because of the absence of a 5-year supply – that would be illogical and irrational.

11. Policy HOU2 essentially places greater weight on local neighbourhood circumstances – a substantial surplus of housing permissions over the LP minimum requirement – than on the district-wide absence of a 5-year supply. This was explicitly supported by the independent examiner, and we now ask that you, madam, do the same.
12. The LPA’s reason for refusal indicates that the appeal proposal would be contrary to “Policy DP1 and the aims and objectives of the CC&ANP”. The evidence of Mr Crawford and Mr Wallace for the LPA clearly identifies the nature of the conflict with Policy DP1, and you will hear representations from others in support of their case. I too note the significant and harmful conflict with DP1 caused by the adverse effects on the character and landscape setting of the settlement. I agree that this is the main issue to be addressed at this inquiry and I fully support the objections raised.
13. I also draw attention to the additional wording in the refusal reason, identifying conflict with “the aims and objectives of the NP”. I submit that such aims and objectives include the requirement for a pause in the release of housing development sites as set out in Policy HOU2, the history and reasons for which I have described above.
14. If a “genuinely plan-led” system is to mean what it says, then these fundamental requirements of up-to-date development plan policies, which clearly point to a refusal of planning permission, must be given the greatest possible weight.
15. In the light of all these considerations, I respectfully request that the appeal be dismissed.

Graham House MSc MRTPI(Rtd)  
8 November 2021