

Ilminster Neighbourhood Plan

Response Form



**South Somerset
District Council**

The Council Offices, Brympton Way,
Yeovil BA20 2HT

Telephone 01935 462462

- The Ilminster Neighbourhood Plan now been formally submitted to South Somerset District Council who are legally required to undertake public consultation.
 - Please use this form if you wish to support or object to the Ilminster Neighbourhood Plan.
 - Please return this form by **midnight on 8 July 2022**.
- Representations received after this date will not be accepted.

Completed Forms should be returned:

- By post to the Planning Policy Team, South Somerset District Council at the address above
- By e-mail to: planningpolicy@southsomerset.gov.uk

Part A- Contact Details

Personal Details	Agent's Details* (if applicable)
Name:	Agent Name: [REDACTED]
Organisation: <i>If Applicable</i>	ORGANISATION Company Name: SAVE SHUDRICK VALLEY GROUP
Address:	Address: [REDACTED]
Postcode:	Postcode: [REDACTED]
Email:	Email: [REDACTED]
Tel:	Tel: [REDACTED]
Signature: [REDACTED]	Date: 1/7/22

*If an agent is appointed, please fill in your name and the full contact details of the agent. Where an agent is used, the agent will be the point of contact.

Please note that representations should be attributable to named individuals or organisations at a postal address. We are required to send comments received in full to the Examiner, but we won't be placing the comments on the Council's website. Comments will be kept for three months from when the plan is formally made. Any personal contact details received will otherwise only be used by the District Council to keep the respondent informed of the Neighbourhood Plan's progress. A summary of any representations received will be published on the Council's Website. Respondents should take care that their comments could not be traced back to them and to not reveal any identifying factors in their statements.

Please confirm you give your consent to the above use of your contact details. Please Tick

The Council's Privacy Policy can be found on its website here: [South Somerset District Council - Privacy and data protection](#)

Part B – Your Comments

1. To which proposed section or policy does your representation relate?

For Office Use Only

Ref:

Please use a separate form for each section or policy you wish to comment on.

PREFACE TO SSVG SUBMISSION

2. Please outline your comments below (continue on an additional sheet if necessary)

COUNCIL REVISED SITES IN NEIGHBOURHOOD PLAN AND THEN REMOVED THEM. ALL - WITHOUT PRIOR CONSULTATION WITH COMMUNITY

3. What Changes would you suggest should be made to the Plan?

RECONSIDER DEVELOPMENT SITES, EXCLUDE STURDRICK VALLEY, WITH ILMINSTER COMMUNITY MAKING THE DECISIONS, NOT SSSDC/UNITARY. NO REFERENDUM UNTIL SITES INCLUDED.

Future Progress of the Neighbourhood Plan for ILMINSTER

Please indicate if you wish to be notified about subsequent progress of the Neighbourhood Plan, including when the District Council makes a decision about 'making' the plan (under Regulation 19), by ticking here. We will contact you by e-mail only unless you request otherwise.

COUNCIL REVISED SITES IN NEIGHBOURHOOD PLAN AND THEN REMOVED THEM ALL - WITHOUT PRIOR CONSULTATION WITH COMMUNITY

Six months after holding the only site selection workshop with the community, Ilminster Town Council's Neighbourhood Plan Development Group revised its housing development sites in the Plan draft without further consultation over the proposed changes.

Despite the Regulation 14 community consultation originally set for 27th April 2020 being delayed due to Covid until June 2021, no opportunity was taken during this 14 month period to advise the community of the changes to the Site Allocation Assessment.

This additional evidence (below) was only spotted by Save Shudrick Valley Group when perusing the documents submitted for the Reg 16 consultation - and it shows that the town council added new sites after the Site Selection Workshop without referring back to the community.

On Page 12 of the first draft INP is the Site Selection Workshop Results Map, from the workshop, attended by 29 members of the community in September 2019. The **ATTACHMENT, called LEGEND A**, 'Preferred land use legend' that:

"Only sites that were mentioned by participants are shown on the map."

Then, when the map transferred over from the first draft plan into Appendix D Pre-Reg 14 consultation version the Legend had changed to:

"These are the sites that were considered at the workshop only. Please note that additional sites were considered after this and as a result of the Call for Sites exercise." (see ATTACHMENT called LEGEND B).

This is evidence that sites were added and not made public until the March 2021 town council meeting when Appendix D was presented with other INP documents to the town council - and only consulted on with the community in June 2021.

The map forms part of the council's Consultation Statement but as an example of good consultation it fails dismally, merely highlighting the shortcomings of their consultation process. Importantly, it proves that the council DID NOT CONSULT on the changes made to the site allocation from March 2020 right through to Reg 14 consultation in June 2021.

Despite the fact that the sites have now been dropped from the INP, it is imperative that this matter is recorded as it again provides an example of how abysmal the consultation was during the many stages of the preparation of the plan.

SSVG has already recorded in our submission called CONSULTATION FAILURES how the Neighbourhood Plan Development Group made major changes to its Site Selection report for the second draft of the INP.

The changes were made following a meeting with representatives of the Shudrick Valley site, and also a meeting with other site owners in the town. But the changed Site Allocation Assessment which the NPDG then agreed on 18th March 2020 was not

presented to the town council for a whole year - on 19th March 2021. The public consultation on this Reg 14 draft did not take place until three more months later. As this change involved such controversial issues as changing its mind over development in Shudrick Valley - which had already been rejected for development in the current Local Plan and dismissed at planning appeal - it was imperative that consultation with the community should have taken place prior to Reg 14 and further site workshops held as promised. This ultimately resulted in the removal of all sites after the Reg 14 consultation.

The INP is supposed to provide the community of Ilminster with an opportunity to influence and determine the future development of the parish and provide a vision for the town.

The above highlights the lack of opportunity for the community to truly engage in the plan making process and influence and determine the future development of the town.

AECOM RETAIN SITES IN SEA

The consultants AECOM, in their SEA final draft submitted for Reg 16 on the SSDC website, explains its own situation following the withdrawal of the development sites in the INP: having carried out an appraisal of sites for development, they kept the site appraisals in the final version of the SEA even though all sites had been dropped. AECOM state at Para 4.4 of **ATTACHMENT called POINT**: "Following Reg 14 consultation on the NP the decision was made to no longer allocate sites through the NP. While the reasonable alternatives work outlined below was undertaken when it was the intention of the NP to allocate sites for development, this work continues to be presented in this Environmental Report. This is with a view to demonstrating how the SEA process has informed plan making through the NP's development and its iterative nature."

AECOM state in Para 4.12 of the December 2020 version that the shortlisted development sites were "assessed through the SEA process" and in Para 4.13 of the December 2020 version: "In this context the sites have been considered in relation to the SEA Framework of objectives and decision making questions developed during SEA scoping and the baseline information. This SEA assessment was undertaken separately to the site assessment undertaken on behalf of the Ilminster Neighbourhood Plan Steering Group **and the findings of the appraisal were fed back to the NP Steering Group in late 2020.**" **The section in bold was only added to this Paragraph now at 4.14 of the April 2022 version of the SEA for Reg 16.**

The important factor here is that the findings referred to were in the SEA version submitted to the town council in December 2020, well AFTER the NPDG made its own changes to the site assessments in March 2020 and which were then not discussed by NPDG or the town council until adopted in March 2021. That must mean that the information contained in the SEA site assessments were not considered in choosing sites and this must breach the Basic Conditions.

Save Shudrick Valley Group feels AECOM's statement also upholds our own Group's decision to include submissions regarding the sites at the Reg 16 consultation, even though the sites have been dropped - we have expressed this view elsewhere. We want to show the process and decisions made, highlight the problems with consultation, and try to put the spotlight on what influenced the decision to abandon a four year site selection process.

By doing so we hope that it will show the Examiner that this was a grave mistake by the NPDG and that there is still an opportunity to get the sites right for the community of Ilminster even if it means delaying the publication of the Neighbourhood Plan for a few more months.

The town council had also promoted the fact that development sites would be included in the Plan, before dropping them after the Reg 14 consultation.

In Para 1.2 of its Preferred Options submission for the South Somerset Local Plan Review, the town council said:

“This is an ambitious, community led plan and it is our intention to allocate sites for development. These will be complemented by the preparation of Design Codes. Work on these final stages is currently underway and will be completed by December 2019.”

Instead of having a Neighbourhood Plan complemented by a Design Guide, the Ilminster Community will now have a Design Guide with a severely weakened Neighbourhood Plan led by developers and no development sites allocated. Ilminster residents will have NO SAY in where sites will be allocated or how many homes will be built on each site up to 2040.

SAVE SHUDRICK VALLEY GROUP

Save Shudrick Valley Group produced and distributed a newsletter to the community advising them that development sites had been withdrawn from the INP without proper consultation or being highlighted by the town council.

We felt most residents would be unaware of this fact as there has been no effort by the town council to include an explanation in the INP documents. The community could be forgiven for thinking that the Reg 16 version of the INP still included development sites - this major change to the plan has not been highlighted. In the plan Introduction on Page 11 at Para 2.2 ‘What is the aim of a neighbourhood plan?’ it still states that one of the aims is to **‘provide its community the opportunity to influence (D): development allocations ie development sites and number of dwellings.’**

In fact the documents relating to the Site Selection Workshop still appear in Appendix D giving the impression that the sites are still included in the INP.

The newsletter highlighted these facts to encourage the community to take part in this important part of the INP process.

A copy of the SSVG newsletter is attached as NEWS.

Site Selection Workshop

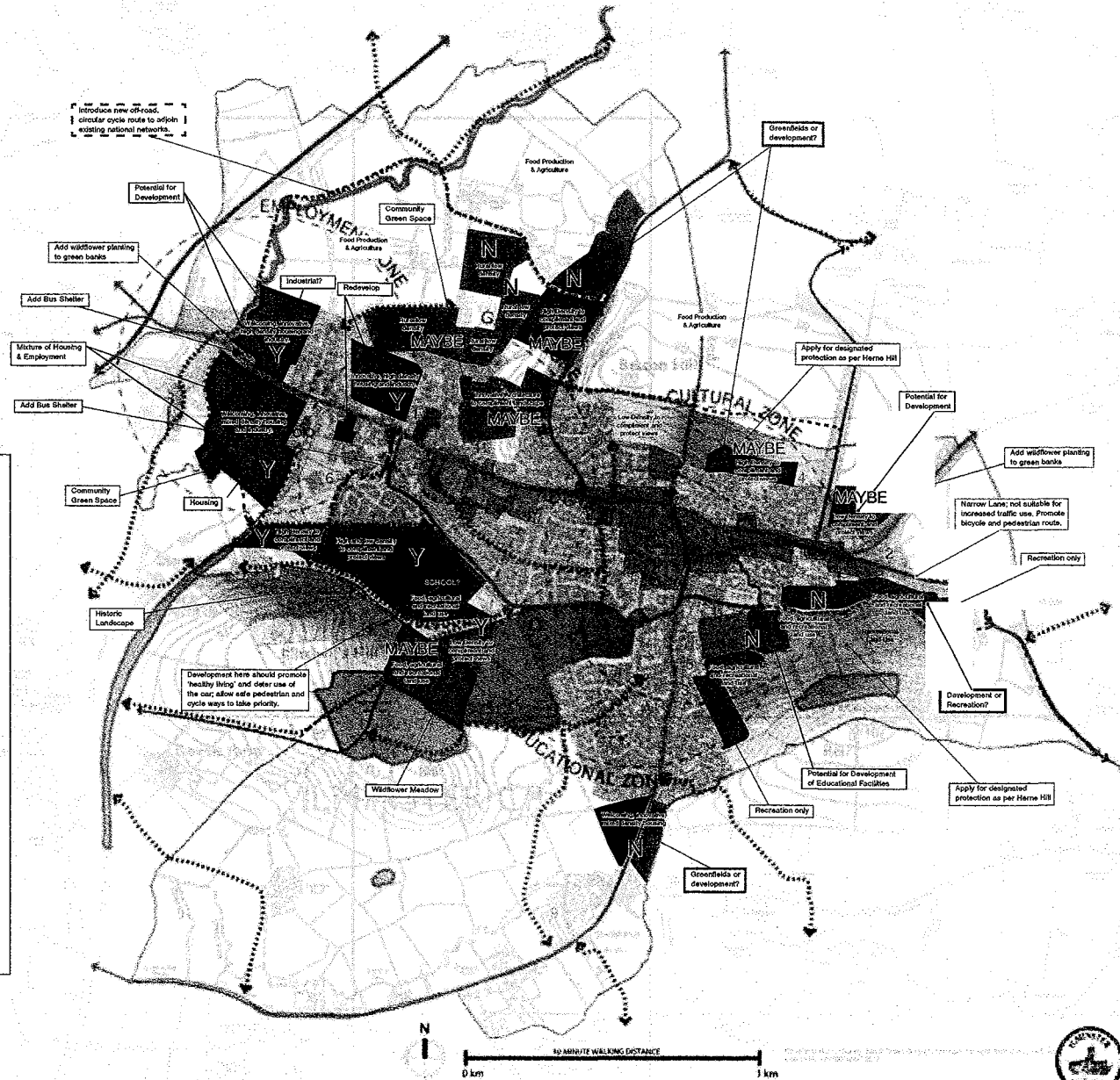
RESULTS MAP
October 2019

Preferred Land-Use Legend:

- High Density Housing
- Low Density Housing
- Education
- Open Space including Food & Agriculture
- Employment

Y YES - greater consensus *for* housing development
MAYBE MAYBE - *undecided* consensus for housing development
N NO - greater consensus *against* housing development

NOTE:
 - The main colour of the sites is the primary preferred use, the outline colour the secondary use.
 - Only sites that were mentioned by participants are shown on the map.



ILMINSTER NEIGHBOURHOOD PLAN

ECA Architecture | E: martha@eca-p.com
 Planning | W: eca-p.com
 Community | T: 01202 675 152



LEGEND A

LEGEND B







Figure 2
Site Selection Map

Site Selection Workshop

RESULTS MAP

October 2019

Sites Considered at the workshop*
Preferred Land-Use Legend:

-  High Density Housing
-  Low Density Housing
-  Education
-  Open Space including Food & Agriculture
-  Employment
-  Development Area and Sites with planning permission

Y YES - greater consensus *for* housing development

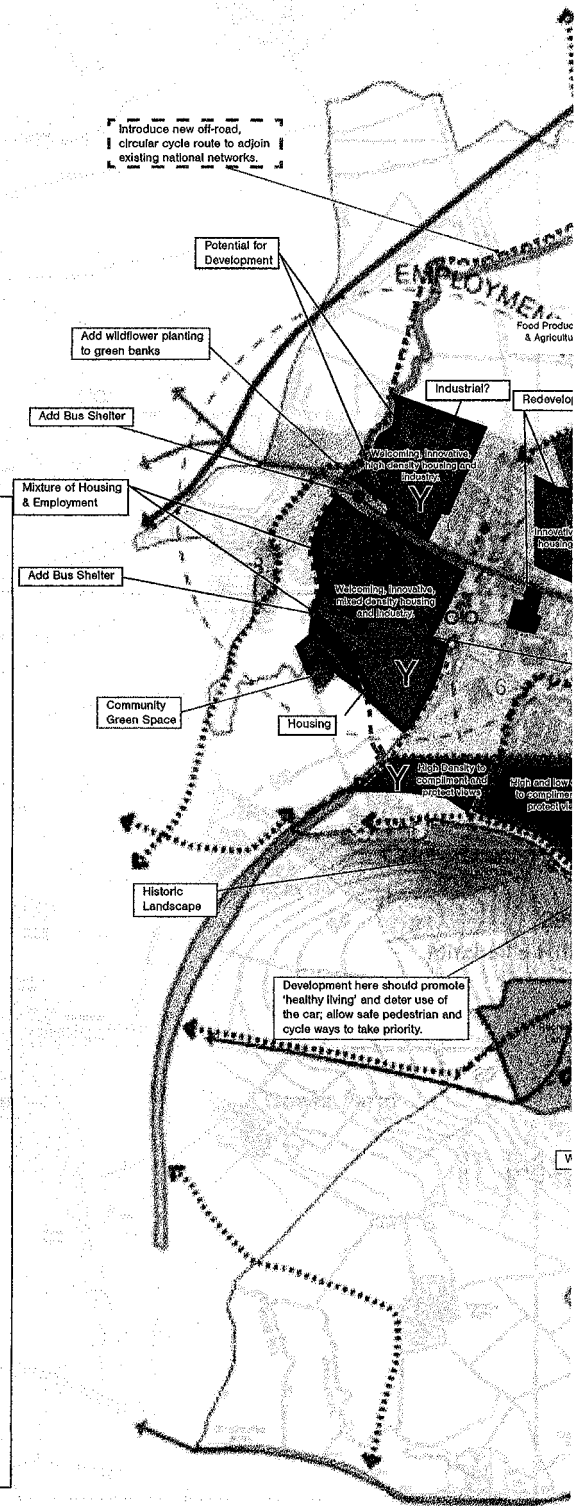
MAYBE MAYBE - *undecided* consensus for housing development

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* These are the sites that were considered at the workshop only. Please note that additional sites were considered after this and as a result of the Call for Sites exercise.



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4. What has plan making / SEA involved up to this point?

Introduction

- 4.1 In accordance with the SEA Regulations, the Environmental Report must include...
- An outline of the reasons for selecting the alternatives dealt with; and
 - The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.
- 4.2 The 'narrative' of plan-making / SEA up to this point is told within this part of the Environmental Report. Specifically, this section explains how preparation of the current version of the Ilminster Neighbourhood Plan has been informed by an assessment of alternative locations for development in the neighbourhood area.
- 4.3 The following sections therefore describe how the SEA process previously sought to inform the preferred development strategy for the neighbourhood area and potential locations for development.
- 4.4 Following Regulation 14 consultation on the Neighbourhood Plan, the decision was made to no longer allocate sites through the Neighbourhood Plan. Whilst the reasonable alternatives work outlined below was undertaken when it was the intention of the Neighbourhood Plan to allocate sites for development, this work continues to be presented in this Environmental Report. This is with a view to demonstrating how the SEA process has informed plan making through the Neighbourhood Plan's development, and its iterative nature.

Overview of plan making / SEA work undertaken since 2017

- 4.5 The neighbourhood area was formally designated by South Somerset District Council in June 2017.
- 4.6 Significant public consultation has been carried out since then to support the preparation of the Neighbourhood Plan. This has gathered local views and opinions, with a view to engaging local people throughout the Neighbourhood Plan's development process. This has included events, household questionnaires, meetings, open days, community surveys, and engagement through the Neighbourhood Plan website.

Housing numbers to deliver through the Neighbourhood Plan

- 4.7 As discussed in **Chapter 2**, the Ilminster Neighbourhood Plan has been prepared in conjunction with the provisions of the South Somerset Local Plan 2006-2028 (adopted in March 2015), with due regard given to the emerging Local Plan review.
- 4.8 As part of the emerging South Somerset Local Plan 2016-2036, South Somerset District Council (SSDC) highlights that 839 dwellings should be delivered in Ilminster by 2036. As of November 2019, 119 dwellings had been

DEVELOPMENT SITES REMOVED FROM

NEWS

NEIGHBOURHOOD PLAN:

ILMINSTER RESIDENTS DESERVE BETTER THAN THIS

There are NO development sites for homes allocated in the proposed Ilminster Neighbourhood Plan - but residents have the opportunity to make their objections known by responding to the Regulation 16 public consultation which started on 19th May and runs until Friday 8th July.

For four years the town council's Neighbourhood Plan Development Group promised Ilminster residents the opportunity to influence where development sites should be located and the number of homes on each site. This was the most important part of the proposed INP with a minimum 839 homes over the plan period to 2040.

This is still quoted as an aim in the current Regulation 16 Neighbourhood Plan where it states: "The aim of a Neighbourhood Plan is to guide future development, regeneration and conservation within the town or parish and its surrounding area and provide its community the opportunity TO INFLUENCE DEVELOPMENT SITES AND NUMBER OF DWELLINGS."

What the Plan document itself doesn't say is that the town council, following the community's responses in the Regulation 14 consultation last June, decided in October to remove all 13 sites. There was no consultation or discussion with the community before this major change was made and the plan submitted for the Reg 16 consultation.

The decision to withdraw sites was despite the fact that the council stated there were "no technical planning reasons why any of the sites should not be allocated for development". The council said that the housing policy 'ILM12: Amount and Location of New Homes' was "the most controversial policy in the plan and has generated considerable objection."

Following the Reg 14 consultation responses regarding proposed sites the council said it was considered "beyond the scope of this NP and expertise and resources of the INP Development Group to pursue this policy to adoption."

The town council continued: "Significant amendments would be needed to address most of the concerns and additional development sites would need to be sought. To retain the policy raises the risk of a failed referendum and risks all of the policies in the INP not being taken forward for adoption."

Without any further consultation with the community the sites allocated were removed from the INP.

ILM12 WAS THE MOST IMPORTANT POLICY IN THE INP BUT WITHOUT SITES THE RESIDENTS OF ILMINSTER HAVE LOST ANY OPPORTUNITY TO INFLUENCE WHERE DEVELOPMENT SHOULD TAKE PLACE AND NUMBERS OF HOMES ON EACH SITE.

This could result in inappropriate development in the wrong places, destroying Ilminster's unique landscape character and the setting of historic assets. The decisions on new development in the town will be made by 110 councilors on the new Somerset unitary authority which includes only two Ilminster representatives.

That is why we believe it is important residents take the opportunity to act NOW by taking part in the Ilminster Neighbourhood Plan Reg 16 consultation. State that you do not support the Plan without development sites and that it should not go to Referendum until it has been revised to include development sites influenced by consultation with the community, as promised to residents throughout the NP process. There should have been proper communication and discussion with the community over such a major change before the Plan was amended in October 2021.

The aim of a Neighbourhood Plan is to enable the local community to influence the location and size of development NOT leave it to landowners and developers. The residents of Ilminster deserve this opportunity.

~~WHY IS THIS SO IMPORTANT?~~ Because the district council or unitary authority as it will become next April, has made it very clear that "Ilminster is seen as an attractive location for housing development by house builders - unsurprisingly there is pressure from the development industry to deliver more housing in the town." In addition to 839 new homes by 2040, the district council stated in its response to Reg 14 consultation: "We may need to pick up any additional housing sites in Ilminster through the Local Plan Review if we consider more are needed as a result of further work on sites against our overall housing target." So we are talking about a minimum of 839 homes up to 2040 - that figure is likely to be much higher.

The NP Development Group chairman said before the first consultation last summer: "What will happen if we do not get a Neighbourhood Plan for Ilminster? We will have no control on any future development of the town." But by removing the sites, the council will do just that - give control of future development to the district/unitary authority. The Localism Act which was intended to allow communities to influence their own town's future development will have been lost in Ilminster.

We want to thank the many people who supported Save Shudrick Valley Group with individual submissions during the Reg 14 consultation last summer. Those submissions were crucial as the official submissions by SSVG were lost by the town council despite being delivered by hand and on time for the consultation. This was only discovered three months after the closure of the consultation after SSVG approached the council. The submissions were found in the town council office but we have still received no official apology or explanation, and despite promises from the council the submissions were not later included in the published consultation report.

The absence of development sites is the main issue why SSVG believes this Neighbourhood Plan should not be adopted but we will be making a submission for Reg 16 which will highlight other matters for the Examiner to consider which you may wish to add to your submission - you may also add your own topics and views. These include:

- there is no shared vision for the future of Ilminster because of serious lack of consultation and the community not being kept up to date or engaged during the Plan's progress;
- the plan does not meet the Basic Conditions required in the NP regulations;
- important documents were not properly adopted;
- mistakes appeared in the submitted plan and in adopted associated documents;
- flooding not properly considered;
- aspirations for the Plan not properly supported by evidence to meet regulations;
- district council did not consider sites correctly.

A hard copy of the INP can be inspected during normal opening hours at SSDC offices in Yeovil, at the Ilminster Library or the town council offices. All of the documents can be seen online at the link below. Response forms are also available at those venues.

Consultation response forms can also be found at this link, open 'Ilminster' from the list of parishes and look for the Reg 16 Response form:

<https://www.southsomerset.gov.uk/your-council/your-council-plan-and-strategies/planning-policy/neighbourhood-planning/>

The council encourages those responding to use the response form available **but that is not essential** - post or email letter is OK if you cannot complete a form.

Please make your objections to the INP by midnight on 8th July 2022 either by post to: **Ilminster NP, Planning Policy Team, South Somerset District Council, Council Offices, Brympton Way, Yeovil BA20 2HT**, or email to planningpolicy@southsomerset.gov.uk

THANKYOU FOR READING AND FOR YOUR SUPPORT