1.0 INTRODUCTION

1.1 Brooke Smith Planning Consultants Ltd, Chartered Town Planning & Development Consultants, are instructed by John T Cullen to make formal representations to the South Somerset District Council – Proposed Submission Local Plan 2006-2028. These comprise comments on the soundness of the proposed Plan and promotion of land to the east of Holywell, Yeovil for residential development.

1.2 Our client is aware that the South Somerset Local Plan aims to set out the spatial strategy for the District over the period 2006-2028. Furthermore, he is aware that the document aims to define the type of development required to meet the local community and business needs, its scale and location and in so doing present a range of policies which ensure that appropriate supporting development is sustainable.

1.3 In preparing these representations, our client has brought together a team of consultants to examine the Proposed Submission Local Plan and supporting documentation together with a range of technical and environmental issues. These include landscape, ecology archaeology, access, highways, visual impact and design matters. Reflecting this, a number of technical assessments are annexed to this representation.

1.4 The following sections of this submission present a comprehensive review of the policies within the Proposed Submission Local Plan, specifically with respect to the delivery of residential development and the proposed Sustainable Urban Extension site to the south of Yeovil. The submission then presents land to the east of Holywell, Yeovil, which is predominantly within the ownership of John T Cullen as a location for residential development, either to supplement the allocations proposed to date, or to replace elements of that allocation.

1.5 The submission explores the development potential of this land, making reference to a range of key issues including density, access, landscape and ecology. This is accompanied by an analysis of elements which currently comprise the proposed Urban Extension where a number of concerns are raised.
1.6 Officers will be aware that formal representations have previously been made on behalf of John T Cullen trading as Stylespace Ltd., to a number of documents within the South Somerset LDF. These have continued to promote land in the general vicinity to the east of Holywell, Yeovil:

- Core Strategy Issues and Options Document - April 2008
- Strategic Housing Land Availability Assessments – August 2008, February and May 2010; and
- Draft Core Strategy (Incorporating Preferred Options – October 2010)

1.5 The representations have continued to promote land to the east of Holywell, Yeovil and indeed officers have previously accepted that, subject to achieving access, the area is suitable for development. It is considered important to continue with the submission of representations particularly given the recent publication of the National Planning Policy Framework and the need for any emerging Local Plan to be robust, sustainable and achievable. It is contended that the inclusion of the representation land would assist in this.

1.6 By way of overview, the submission herewith contends that;

- Due to a persistent under delivery of housing and an anticipated annual shortfall over the remaining period of the plan, an additional 20% buffer equating to 3,190 dwellings should be added to the District wide housing provision for the period up to 2028;

- Furthermore, it is contended that the evidence base used to identify the existing commitments for Yeovil is out of date, as a number of applications/permissions have either been implemented or have expired. The base figures are considered flawed and accordingly, the housing requirement for Yeovil should increase from 4,111 to 4,502 dwellings;

- Our client supports the principle and general location of the Urban Extension in that given the needs of the area, an area to accommodate substantial residential growth concurs that this should indeed be located to the south of Yeovil. However, concerns are raised regarding the sustainability of a number of sites
that have been included within the Masterplan. As such, it is contended that the sites included within the Masterplan should be reviewed;

♦ Land to the east of Holywell, Yeovil, as detailed within this submission, is presented as a suitable, viable and available site for residential development. The site can be accessed, can be developed at an appropriate density, is not dependent on other land coming forward for development and is available for immediate development. As such it could either supplement the area of residential land advocated by the local planning authority, or replace land which is overly constrained but has been included to date within the Urban Extension area.
2.0 REVIEW OF THE PROPOSED SUBMISSION DOCUMENT

2.1 As noted earlier, representations have previously been made on behalf of John T Cullen to various emerging Core Strategy documents, including the Draft Core Strategy (Incorporating Preferred Options) (November 2010), Issues and Options Document (August 2008) together with representations to the Strategic Housing Land Availability Assessments in 2009 and 2010. Reflecting these, the submission herewith focuses on the strategy for development within South Somerset and in particular the issues of sustainability; the strategic vision over the plan period; the strategy for development and the distribution and location of new housing and transport.

2.2 Accordingly, the following paragraphs of this Section of the submission reviews issues of sustainability, vision, strategy and the specific promotion of the Urban Extension to the south of Yeovil. Where appropriate and relevant reference is made to the National Planning Policy Framework and an indication is presented of support or objection to specific policies advocated by the local planning authority.