Appeal Decision

Inquiry held on 20 March – 27 March 2018 Site visit made on 28 March 2018

by Phillip J G Ware BSc(Hons) DipTP MRTPI

an Inspector appointed by the Secretary of State

Decision date: 18 June 2018

Appeal Ref: APP/V3310/W/17/3187070 Land east of Newton Road, North Petherton

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
- The appeal is made by Gladman Developments Limited against the decision of Sedgemoor District Council.
- The application Ref 37/17/00052, dated 13 May 2017, was refused by notice dated 20 September 2017.
- The development proposed is the erection of up to 140 dwellings, the demolition of outbuildings, with public open space, landscaping and sustainable drainage system, and vehicular access from Newton Road.

Procedural matters

- 1. The proposal is in outline with only the access to be determined at this stage, along with the principle of the development.
- 2. A Unilateral Planning Obligation was discussed in full draft at the Inquiry, and the final version was submitted on 3 April 2018. I will return to the Obligation below but, in the light of the discussion at the Inquiry, there was no need to seek the parties' further views.

Decision

3. The appeal is dismissed.

Main issue

- 4. The Council refused planning permission for four reasons. Three of these (archaeology, flooding, and highway safety) have been resolved by the submission of further evidence and are the subject of Statements of Common Ground¹. I will return briefly to these matters below, but I have no reason to dispute the contents of these documents.
- 5. The remaining reason relates to the fact that the appeal site is outside the defined settlement boundary, and is therefore in the countryside in which restrictive policies apply.
- 6. With that background there are no site specific matters between the main parties and there is one main issue in this case. That is whether the site is suitable for development, in the light of the locational policies in the

¹ SOCG 2, 3, 4

development plan and other material considerations, including the housing land supply position.

Reasons

Background

- 7. The appeal site comprises five fields and a number of agricultural buildings, which form part of a farm. The site fronts onto Newton Road, at which point there is no pavement. The field boundaries are defined by a mixture of hedges and trees, with a landscape screen to the east. There is a public footpath through the western part of the site.
- 8. The site is outside the settlement boundary of North Petherton, with the main built up area lying to the north. North Petherton has a range of services, facilities and bus routes². There is no dispute as to the sustainability credentials of North Petherton.

The key provisions of the development plan

- 9. The relevant part of the development plan is the Core Strategy (CS) 2006-2027, which was adopted in October 2011³. The site is not allocated for any purpose in the CS and is outside of but adjacent to the settlement boundary.
- 10. The Council is currently working on a draft Local Plan (dLP), which was the subject of examination Hearings around the time of the Inquiry. The appellants have made dLP representations in relation to the housing land generally and the non-allocation of the appeal site. The dLP includes allocations for some 270 additional homes on greenfield sites outside the North Petherton settlement boundary to the immediate north and east of the appeal site. The parties agree that, as there are unresolved issues and objections, only limited weight can be accorded to the dLP.
- 11. The overall spatial strategy of the CS is set out at policy S1. This approach which focusses on the most sustainable locations mainly Bridgewater followed hierarchically by two other settlements and then on Key Rural Settlements (KRS) of which North Petherton is one. Development outside settlements will be considered in relation to the potential reuse of previously developed land, the provision of employment opportunities, and whether a countryside location is essential. These exceptions are not argued in this case. There is no dispute that the general approach of emphasising sustainable locations is in line with the principles of the National Planning Policy Framework (the Framework).
- 12. The appellant accepts that the proposal is contrary to CS policy S1, in that it is outside the defined settlement boundary, but maintains that it does not conflict with the overall approach of focussing development in sustainable locations. This is said to be emphasised by the location of the site adjacent to the settlement boundary and it is argued that the development would not undermine the role of North Petherton, especially as there are no site-specific objections to the proposal.
- 13. There was an issue raised at the Inquiry as to the meaning of 'self-containment' in the context of the justification for policy S1. Whilst I

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² SOCG 1 paragraph 2.2.3 - 2.2.4

³ The saved policies of the Sedgemoor District Local Plan (2004) are also part of the development plan

appreciate the appellant's point that, in order to meet housing targets (to which I return below), development of greenfield sites will be necessary, it is clear to me that the overall approach of the adopted plan is to focus development within settlements that are supported by adequate services. Whatever the result of the eLP consideration of sites outside settlement boundaries may be, it is clear that currently adopted policy aims at focussing development within established boundaries.

- 14. Overall, subject to the appellant's points below, I give significant weight to policy S1 and the existing settlement boundaries, as the policy is in conformity with the approach of national policy in that it focusses development on sustainable locations. It is part of a plan-led framework within which decisions can be made with a high degree of predictability for the benefit of all parties.
- 15. CS policy P6 provides that proposals for new development outside identified settlements will be strictly controlled. There are certain exceptional circumstances set out within the policy, such as development relating to specific countryside needs, but none of these circumstances are argued in this case. This is clearly not a landscape policy, which is covered elsewhere in the CS, but a policy seeking to protect the countryside for its own sake. It is a restrictive policy akin to the national approach which existed at the time of the adoption of the CS, and is not consistent with current national policy. I will return to the consequences of that position below.
- 16. As was explained in evidence, a 'P4 proposal' has a particular meaning in Sedgemoor. This relates to CS policy P4 which provides that sites outside KRS settlement boundaries may exceptionally be released to assist in the supply of affordable housing. However, amongst other matters, this requires a local need to be identified in a local Housing Needs Assessment. The purpose of the policy is to allow for community driven development to meet specific needs in the local area. In this case, the appellant accepts that the appeal is not a 'P4 proposal' and that it is in conflict with the policy.
- 17. There are two other policies which are of some relevance to the appeal although neither were referenced in the Council's decision. Policy D5 supports the delivery of housing where, amongst other matters, it accords with the overall strategy. If the authority were unable to demonstrate a five year housing land supply there would be a sequential release of sites, including development in the KRSs, on sites (such as this) identified in the SHLAA as having future potential. However, even in those circumstances this policy would require sequentially preferable locations to be considered and discounted, which has not been done in this case. A similar sequential approach is taken in CS policy P1.
- 18. The Council's overall position is that the proposal is in conflict with CS policies S1, P4 and P6, although there is no objection on landscape or visual grounds. The appellant accepts that the proposal is contrary to these CS policies, though not the principles underpinning them, but contends that consideration must be given to the weight to be attached to the breaches of policy in the light of a number of matters which I will consider below. I do not consider that CS policies S1 and P4 are inconsistent with Framework policy, and I conclude that the conflict with them is a matter of substantial weight. The position is different in relation to the weight to be accorded to CS policy P6, but the proposal remains contrary to that adopted development plan policy.

- 19. Section 38(6) of the 2004 Act requires that planning applications be determined in accordance with the development plan unless material considerations indicate otherwise. In this case the site is outside the settlement boundary and none of the exceptional circumstances set out in the policies are argued. The proposal is therefore clearly in breach of the development plan.
- 20. One of the Core Planning Principles in the Framework is that planning should be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. The system should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. The fact that the appeal scheme is outside the adopted settlement boundaries conflicts with that principle. The appeal scheme would conflict with the locational policies in the development plan and is not suitable for development at this time. This weighs heavily against the proposal.
- 21. The appellant's position is that the policy conflicts are reduced due to a number of matters and that the 'tilted planning balance' in paragraph 14 of the Framework should apply. Three separate reasons have been put forward, which I will consider in turn:
 - The fact that the CS pre-dates the Framework and Planning Practice Guidance (PPG), especially in relation to the approach to the housing requirement.
 - The publication of new evidence related to the housing requirement.
 - The argument that the Council cannot demonstrate a five year supply of deliverable housing land.

Compliance with national policy and guidance

- 22. There was a debate at the Inquiry as to whether the relevant policies are upto-date in terms of the Framework in relation to the timing of their adoption relative to the publication of the Framework and subsequently the PPG.
- 23. However, leaving to position regarding CS policy P6 aside for the moment, the chronological age of the CS, which was apparently considered by the CS examining Inspector at that time in the light of the emerging Framework, is of very limited significance. I agree that the way in which the CS housing requirement figure was calculated does not reflect the current approach of the Framework. However I do not regard the difference in approach, especially the way in wider policy objectives were expressed, to be so fundamental as to render the CS out of date for that reason. Any alleged non-compliance should be significant, especially as the CS is only about half way through its period. Nor do I accept the appellant's argument that the production of the eLP itself suggests that the adopted plan is out of date it merely points to the fact that the authority is updating the policy, as it should do. It does not indicate that the existing plan should be accorded reduced weight.

New evidence related to the housing requirement

- 24. I will come back below to the implications the latest housing requirement in terms of the existence or otherwise of a five year housing land supply. However there is also an issue of principle raised by the appellant as to whether the CS is out of date by reason of the publication of the more recent housing requirement figures.
- 25. The CS, and the housing requirement therein, was adopted in 2011 and was based on 2008-2009 population projections and a 2010 assessment. It is self-evident that these are becoming dated. As part of the evidence base for the dLP, a new requirement figure was put forward in Strategic Housing Market Assessment (2016) (SHMA).
- 26. This new figure is clearly more up to date than that used in the preparation of the CS, and this is a benefit. However it forms part of a package of documents which have yet to be independently tested as part of the dLP process. Their draft nature, combined with the fact that they are but one part of the package, limits their importance at this stage.
- 27. It has been suggested by the appellants that the publication of the SHMA was the point at which CS became out of date. But it cannot be right that an adopted plan, only half way through its period, becomes out of date when new (draft) evidence is produced as part of the necessary review process. I therefore do not accept that the CS is out of date for this reason.

Five year housing land supply - background

- 28. Particularly given the fact that the Examination into the dLP was ongoing at the time of the Inquiry, it is clearly not for me to supplant the role of the dLP Inspector, but to come to a view if possible of the position in relation to five year housing land supply as part of the considerations leading to my decision. I should start by saying that depending what assumptions are made and which approach is taken, the Council's position is that the authority has slightly in excess of 9 years supply of deliverable housing sites, whilst the appellant's position is slightly below 2 years. This is a huge gulf and, despite numerous discussions, the difference between the parties remains.
- 29. I am aware that the dLP Inspector has requested a range of alternative scenarios leading to differing housing land supply positions. However there is nothing before me to suggest that this indicates any view on her part on the various scenarios. By the close of the Inquiry it was not known what approach she will take on the positions of the Council, the current appellants and doubtless other parties (whose dLP evidence I have not seen) in relation to housing supply. That is a matter for her.
- 30. Nonetheless I will consider the evidence put before me to seek to arrive at a view on the housing land supply position with the proviso that this is not the full picture which my colleague will be considering. I will deal with the key areas of dispute between the parties.

Five year housing land supply - requirement

31. Dealing firstly with the housing requirement, the Council's position is based on the adopted CS figure. This has the benefit of being a fully tested and adopted requirement, though it must be accepted that the passage of time will

inevitably call its currency into question. In addition, as alluded to above, there is a question as to the method by which this was calculated and whether it represents a Full Objectively Assessed Housing Need (FOAN) as it is now defined.

- 32. More recently the Council has produced a higher annualised requirement in the SHMA. But although this requirement is more up to date, it is as yet untested through the examination process. I was told at the Inquiry that it has been the subject of objections and is still being considered.
- 33. The appellant's position is that this 2016 figure is significant new evidence, which has displaced the CS figure. For the purposes of this appeal (only) the appellant has proceeded on the basis that 644 d.p.a. is the correct housing requirement.
- 34. I have some sympathy with the suggestion that the 2016 figure should be regarded as the current and up to date housing requirement. However, given that it is untested and is the subject of objection I do not consider that it should be regarded as replacing the CS figure at this stage. An authoritative figure can only be achieved following the conclusion of the dLP process.

Five year housing land supply - supply

- 35. The position is equally unclear, if not more so, in relation to the supply side. In this respect it is necessary to reiterate that I have limited evidence of the likely progress on sites allocated in the dLP, and those promoting or opposed to the eLP sites will have had the opportunity to make representations to the eLP Inspector. I have not had that advantage and therefore confine myself to more general observations.
- 36. The eLP will identify longer term requirements and the evidence is that this will inevitably require the allocation of greenfield sites outside the existing defined settlements. Such sites are put forward in the eLP, and two of them are close to the appeal site. However, although the appellant sought to persuade me that the eLP should be adopted in full as providing the FOAN, they take an apparently contradictory position in relation to the supply of sites. The Council alleges that the appellants have 'cherry picked' material from the dLP process in that they have adopted the eLP housing requirement but have discounted all the emerging sites which the authority has put forward to address the new requirement. I have considerable sympathy with that criticism. There are a number of areas of disagreement between the parties over the supply, but the main issue is whether the allocated dLP sites should be included in the supply side.
- 37. The emerging sites account for just over 1,000 of the disputed dwellings, which is obviously a very significant amount. None of them are allocated in the CS or have the benefit of planning permission, and I was told that there are outstanding objections to the draft allocations. All are apparently outside the existing settlement boundaries.
- 38. I appreciate that, in order to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. I do not have sufficient evidence to consider the individual position of each of the disputed

- sites. However, in the light of the Council's overall delivery evidence, I consider it a reasonable assumption that at least a significant number of these sites have a realistic prospect of delivery within the time period.
- 39. Conversely the appellant, having omitted all the emerging sites from the supply side, states that the appeal proposal which has no adopted or emerging policy support, no planning permission and is outside the settlement boundary is deliverable within the five year period. There is an inherent inconsistency in that general approach. On that basis, I consider the Council's position on the supply of deliverable sites to be generally more persuasive.

Five year housing land supply - buffer

- 40. The purpose of a 5% buffer (moved forward from later in the plan period) is to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, the buffer increases to 20% to provide a realistic prospect of achieving the planned supply and to ensure choice and competition. This is not intended to be a sanction but a means by which the authority stands a better chance of meeting its housing targets.
- 41. In this case the authority argues that, until the production of a new draft requirement in 2016, it considered that it was meeting its housing targets as set out in the adopted CS. Therefore a 5% buffer was appropriate, especially as there was no suggestion that the Council was aware of the issue before the SHMA was published. However, if the SHMA figure is used, a 20% buffer could be argued to be brought about by under-delivery.
- 42. Again, this is very much a matter which will doubtless be considered as part of the dLP examination, with a wider range of evidence and participants. However, on the basis of what is before me, it seems that there is insufficient evidence to support a record of persistent under delivery against known housing targets, and that a 5% buffer is appropriate.

Five year housing land supply - Liverpool or Sedgefield

- 43. The question of whether the deficit should be spread over the plan period the 'Liverpool' method or addressed within the first five years of the plan period (the 'Sedgefield' method) also focussed around the point that the extent of the deficit only became apparent in 2016. Both parties accepted that both are recognised methods of dealing with the deficit, although the evidence before me was limited for example I do not know if other authorities have been asked to assist with the situation.
- 44. The most commonly used method, in the light of the need to boost significantly the supply of housing, is to address the deficit as soon as possible using the Sedgefield method. However the Inspector examining the eLP will doubtless consider detailed evidence as to whether this is appropriate in the case of this authority. It is not a matter on which I can or should conclude in the light of the evidence before me.

Five year housing land supply - conclusion

45. In the context of this appeal it is not for me to undertake some sort of shadow housing land supply assessment, especially as the dLP Inspector is actively considering the position, doubtless on the basis of more comprehensive evidence than that before me. The Council's approach of using the 'current

year' method as the appropriate base date is also clearly being considered by dLP Inspector.

- 46. In terms of the housing requirement I have some sympathy with the suggestion that the untested 2016 figure should be regarded as the current requirement, but it cannot replace the CS figure at this stage. To address the supply there is clearly a range of potential sites and policies being considered as part of the eLP examination and, on the basis of what is before me, the Council's position is more persuasive. As to the buffer, I consider that a 5% buffer is more appropriate on the basis of what I have seen. I have not been able to reach a conclusion on the appropriateness of the Liverpool/Sedgefield methods.
- 47. These conclusions must be set in the context of the very wide gap a gap wider than any I have experienced in similar cases between the parties on the extent of the housing land supply. It is clearly desirable that, if reasonably possible, I should reach a conclusion on the housing land supply position. However in this case that is not a realistic option, for the reasons set out above, and it is not possible to reach a firm conclusion on the gap between the parties.
- 48. However this is less significant than might otherwise be the case for two reasons. Firstly it is clear that national policy seeks to boost significantly the supply of housing and this remains an important material consideration. Even if the authority were able to demonstrate that it has a five year supply, this does not act as a cap on development. Secondly, as set out above, CS policy P6 is inconsistent with national policy. This is a relevant policy which is out of date and the so-called 'tilted balance' in Framework paragraph 14 is engaged in any event for that reason.

Other matters

- 49. Some local residents have raised concerns about the effect of the additional traffic generated by the proposal, especially on Newton Road. However the Highway Authority, in the light of the appellant's Transport Assessment and Travel Plan, has not raised any objection to the proposed access and visibility arrangements or to the ability of the surrounding network to accommodate the traffic arising from the proposed development. I accordingly do not have any substantial evidence to support residents' concern.
- 50. In the officer's report it was suggested that less than substantial harm (in the terminology of the Framework) would be caused to two Listed Buildings, but that this could be mitigated and considered further at the reserved matters stage. I have no reason to disagree with that position.
- 51. In terms of archaeological matters, trench evaluation has been undertaken, and the parties agree that remains within the site are non-designated assets of regional significance. Furthermore it is agreed that this could be dealt with by a condition requiring a programme of archaeological fieldwork in a defined part of the site⁴. I have no reason to disagree.
- 52. The site is located within Flood Zones 1, 2 and 3, with the latter areas in the east/southeast of the site. The parties have agreed that the area indicated for development lies outside Zones 2 and 3 and that, subject to conditions,

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⁴ SOCG 2

- development can be achieved without significant flood risk. I do not have reason to disagree.
- 53. The proposal is accompanied by a signed and dated Planning Unilateral Obligation ⁵ which includes arrangements for the policy compliant provision of affordable housing ⁶, open space works and transfer in line with policy ⁷, and a detailed Travel Plan ⁸.
- 54. These matters, most notably the provision of affordable housing, weigh in favour of the appeal and all comply with the policy in paragraph 204 of the National Planning Policy Framework and the tests in Regulation 122 of the Community Infrastructure Levy Regulations 2010.

Planning balance and conclusion

- 55. The proposal would bring with it a number of economic benefits, in particular the fact that the construction phase would generate employment and that the completed development would add to the potential spend in the area.
- 56. In terms of social issues, the provision of both market and affordable housing is to be welcomed. Even if I had concluded that there is a five year supply of housing land, the proposal would be a benefit as a contribution to a rolling supply. The provision of affordable housing in line with adopted policy, and in excess of the emerging dLP figure, is a significant benefit. The provision of open space would be a benefit to new and existing residents, and would improve links to the main part of the settlement.
- 57. I am less convinced of the environmental benefit of a landscaping scheme, which is said would improve biodiversity. That may be the case, but in the context of an outline proposal this is a matter which attracts only limited weight. The lack of harm to the character and appearance of the area is a neutral factor.
- 58. As set out above, I have carefully considered the evidence in relation to housing land supply and other matters in the context of paragraph 14 of the Framework. I have concluded that CS policy P6, dealing with development in the countryside, does not fully comply with current national policy and I have accordingly reduced the weight which can be accorded to it. This policy is clearly relevant to this case and is out of date. The 'tilted balance' therefore comes into play for that reason alone.
- 59. National policy in that case is that, where relevant policies are out of date as in this case in relation to CS policy P6 permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
- 60. Based on my considerations above, the benefits of the proposal (especially the provision of market and affordable housing), are significantly and demonstrably outweighed by the adverse impact of the proposal namely the conflict with the adopted development plan locational policies.

⁶ CS policy D6

⁵ Document 14

⁷ CS policy D20 and guidance

⁸ CS policies D 9 and D10; Travel Planning in Sedgemoor (2013); Travel Plan Fees (2010)

61. For the reasons given above I conclude that the appeal should be dismissed.

P. J. G. Ware

Inspector



APPEARANCES

| FOR T | OR THE LOCAL PLANNING AUTHORITY: | |
|-------------------------|---------------------------------------|--|
| Mr G Collett of Counsel | | Instructed by Gladman Developments Ltd |
| | He called ⁹ | |
| | Ms D De Vries | Principal Planning Officer |
| | CertSP MSc MRTPI | |
| | Mr M C Wood | MWA Planning |
| | BA(Hons) BTP MSc PGDip MRTPI MCILT | |

| FOR THE A | FOR THE APPELLANT: | |
|------------|-------------------------|--|
| Mr J Easto | on of Counsel | Instructed by the Head of Legal Services |
| He | called ¹⁰ | |
| Mr | J M Tait | Director, Planning Prospect |
| | (Hons) DipTP MRTPI | . 0.5 |
| Mr | B Jackson ¹¹ | Director, Ashley Helme Associates |
| BE | ng MSc CIHT | |

| INTERESTED PERSONS: | 4,5 |
|---------------------|-------------------------|
| Mr D Thorne | Resident of Newton Road |
| Mr S Bushell | Resident of Alder Close |

INOUIRY DOCUMENTS

| TIVQU | INQUINI DOCUMENTS | |
|-------|---|--|
| 1 | Lists of persons present at the Inquiry | |
| 2 | Extract from Planning Practice Guidance dealing with prematurity | |
| 3 | Extract from Affordable Housebuilding and Housing Summary | |
| 4 | Sites schedule | |
| 5 | Affordable homes screenshot | |
| 6 | Council's HLS documents prepared for the Local Plan examination | |
| 7 | Council emails dealing with AMR and CLG figures | |
| 8 | High Court and Court of Appeal judgements – Daventry District Council. | |
| | [2015] EWHC 3459 (Admin) and [2016] EWCA Civ 1146 | |
| 9 | Council emails dealing with 5 year HLS scenario report | |
| 10 | Housing land supply scenarios | |
| 11 | Closing submissions by the Council | |
| 12 | Closing submissions by the appellants | |
| 13 | Table of agreed/not agreed conditions following discussion at the Inquiry | |
| 14 | Unilateral Planning Obligation dated 3 April 2018 and Council's CIL | |
| | Compliance Statement | |

STATEMENTS OF COMMON GROUND

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|---|-------------|
| SOCG 1 | Planning |
| SOCG 2 | Archaeology |

 $^{^{9}}$ Mr M Willetts (Environment Agency) was not called in the light of the agreement between the main parties on

flood risk

10 Mr C Willingham (Associate Director, RSK) was not called in the light of the agreement between the main parties on flood risk

11 Mr Jackson was called solely to deal with residents' highway concerns

| SOCG 3 | Flood Risk |
|--------|------------|
| SOCG 4 | Transport |

CORE DOCUMENTS

| CORE DOCUMENTS | |
|----------------|--|
| 1.1 | Application Covering Letter, Application Form and Certificates |
| 1.2 | Site Location Plan (7649-L-05) |
| 1.3 | Development Framework Plan (7649-L-02_G) |
| 1.4 | Design & Access Statement |
| 1.5 | LVA |
| 1.6 | Transport Assessment 1529/2/A |
| 1.7 | Travel Plan 1529/3/A |
| 1.8 | Ecological Assessment |
| 1.9 | Arboricultural Assessment |
| 1.10 | Preliminary Risk Assessment 313580-R01 (01) |
| 1.11 | Flood Risk Assessment 881101-R02(02)-FRA |
| 1.12 | Air Quality Screening Letter LE13894 |
| 1.13 | Noise Assessment Report LE13894 |
| 1.14 | Heritage Desk Based Assessment A103095 |
| 1.15 | Archaeological Appraisal A103095 |
| 1.16 | Utilities Statement |
| 1.17 | Foul Drainage Analysis |
| 1.18 | Statement of Community Involvement |
| 1.19 | Socio-economic Sustainability Statement |
| 1.20 | Planning Statement |
| 2.1 | Archaeological Appraisal and Geophysical Survey |
| 2.2 | Ecology - Email 5.07.17 with Bat Transect, Waterbody Location Plan and |
| | Waterbody Table |
| 2.3 | Addendum to Flood Risk Assessment |
| 2.4 | Foul Drainage Strategy update |
| 2.5 | Site Access Drawing |
| 3.1 | Pre-application advice. Correspondence between Case Officer and GDL |
| 4.1 | Conservation Officer |
| 4.1 | Archaeology |
| 4.1 | Ecology |
| 4.1 | Environment Agency |
| 4.1 | Highways Development Group |
| 4.1 | North Petherton Town Council |
| 4.1 | Rights of Way Officer - County Council |
| 4.1 | Avon and Somerset Constabulary |
| 4.1 | Wessex Water |
| 4.1 | EHO - Noise |
| 4.1 | Highways England |
| 4.1 | Traffic and Transport Development Group |
| 4.1 | Affordable Housing |
| 4.1 | CPRE |
| 4.1 | Planning Policy Officer |
| 4.1 | Flood Risk Management Team |
| 5.1 | Committee Report |
| 5.2 | Decision Letter 20.09.17 |
| 6.1 | TA Scoping Study Report January 2017 1529/1 |
| 6.2 | Travel Plan January 2018 1529/3/B |
| 0.2 | Traver Figure Surfacily 2010 1323/3/D |

| 6.3 | TA Supplementary Report November 2017 1529/4 |
|------|---|
| 6.4 | Road Safety Audit Response Report January 2018 1529/5 |
| 7.1 | Core Strategy (2011) |
| 7.2 | 1991-2011 Local Plan Extracts |
| 7.3 | SPG - Sport and Childrens Play Guidance Note |
| 8.1 | Submission Version Local Plan (January 2017) |
| 8.2 | Proposed Policies Map (January 2017) |
| 8.3 | Suggested Main Mods Examination Version (2018) |
| 8.4 | Councils Actions from Hearing Sessions 02/02/18 |
| 8.5 | Examination Hearing Programme March 2018 |
| 8.6 | Five-Year Supply 2018-23 (2018) |
| 8.7 | Settlement Boundary Review November 2016 |
| 8.8 | Settlement Boundary Review November 2016 Map |
| 9.1 | Housing White Paper 2017 |
| 9.2 | Planning for Homes Consultation HWP 2017 |
| 9.3 | Core Strategy Inspectors Report (January 2011) |
| 9.4 | Review of the 'Countryside around Settlements' policy CNE4 (October |
| | 2016) |
| 9.5 | Annual Monitoring Report 2015-16 (March 2017) |
| 9.6 | North Petherton Local Housing Needs Assessment (2014) |
| 9.7 | Local Plan Consultation of the Core Strategy (June 2016) |
| 9.8 | Sedgemoor SHLAA (2016) Extract |
| 9.9 | Sedgemoor SHMA (2016) Extract |
| 9.10 | Somerset SHMA (2016) Extract |
| 9.11 | GVA OAN Report (November 2017) |
| 9.12 | CIL Charging Schedule July 2014 |
| 9.13 | Regulation 123 List |
| 9.14 | Sedgemoor Local Plan Viability Update (June 2017) |
| 10.1 | Droitwich SoS Appeal Decision 2014 (2199085 and 2199426) |
| 10.2 | Heybridge Basin Appeal Decision 2015 (3003795) |
| 11.1 | Wainhomes v SoS Wiltshire (2013) |
| 11.2 | Hunston Judgement (2013) |
| 11.3 | Gallagher Homes Judgement (2014) |
| 11.4 | St Modwen Judgement (2016) |
| 11.5 | Suffolk Coastal Judgement 2017 |
| 11.6 | Cotswold District Council Judgement (2013) |