



Appeal Decision

Hearing held on 18-19 November 2015

Site visit made on 19 November 2015

by Mike Fox BA (Hons) DipTP MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 8 February 2016

Appeal Ref: APP/R3325/W/15/3003376

Land East of Holywell, West Coker Road, Yeovil, Somerset, BA20 2HE

- 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 Mr John Cullen against the decision of South Somerset District Council.
 - The application Ref 13/01791/OUT, dated 2 May 2013, was refused by notice dated 10 November 2014.
 - The development proposed is residential dwellings with associated access, landscape and public open space.
-

Decision

1. The appeal is dismissed.

Application for costs

2. An application for costs was made by Mr John Cullen against South Somerset District Council. This application is the subject of a separate decision.

Procedural matters

3. All matters of detail except access have been reserved for future approval. In addition to a site location plan and a plan showing the location and details of the proposed vehicular access, an illustrative masterplan¹ was submitted. These, together with the Design and Access Statement and a Landscape and Visual Impact Assessment (LVIA), give a likely indication of the character of the proposed development and its landscape impact.
4. A signed and dated unilateral undertaking (UU)² under Section 106 of the Act was submitted by the Appellant. I return to this matter later.
5. A Statement of Common Ground (SCG)³ identifies the principal areas of agreement and disagreement between the Appellant and the Council. The outstanding matters of disagreement in the SCG relate closely to the main issues which I have set out below.

¹ Drawing Ref: 1976.SK08 R4, dated 07.08.12.

² Unilateral Undertaking under Section 106 of the Town and Country Planning Act 1990 relating to Land East of Holywell, West Coker Road, Yeovil, Somerset, signed and dated 3 June 2015, to South Somerset District Council and Somerset County Council.

³ Statement of Common Ground (SCG) between Brooke Smith Planning on behalf of the Appellant and the Council, dated October 2015.

6. Although work started on the East Coker Neighbourhood Plan (NP) in 2013, it was put on hold whilst the Parish Council focused on Local Plan issues. As the NP has not yet reached pre-submission stage, I can only give it limited weight.

Main Issues

7. The main issues are:

- (i) Is the proposed development an appropriate extension of the town of Yeovil in the open countryside, especially in relation to its landscape context?
- (ii) Is the proposed development acceptable in terms of its effect on highway safety?
- (iii) Is the proposed development acceptable in terms of the loss of best and most versatile (BMV) agricultural land?
- (iv) Is any harm arising from the proposal outweighed by any benefits and the fact, as confirmed in the SCG, that the Council cannot demonstrate a five year supply of deliverable and available housing land?

Reasons

8. The appeal site, comprising several joined up agricultural fields, is broadly rectangular and lies on the south-western edge of Yeovil's urban area. It adjoins existing housing to the north and east, and two large, isolated dwellings to the south. Mature hedgerows along its southern boundary contain the site from open countryside to the south, although its western boundaries do not effectively enclose it from the open countryside further afield. The land slopes gently downwards from north to south. Access to the spur road which leads onto the A30 West Coker Road, to the north, would necessitate the demolition of one of the adjacent residential properties facing this main road.

Issue 1 - Is the proposed development an appropriate extension of the town of Yeovil in the open countryside, especially in relation to the landscape context?

9. The Council states that the proposed development would be an unacceptable incursion into the open countryside, with no credible tie with the existing urban edge, and that it would be too extensive to be classified as a natural 'rounding off' of Yeovil's urban area to the south-west. It also argues a landscape case to conserve the countryside for its own sake, stating: "*there is no intrinsic enhancement in supplanting open fields with built form and hard surfacings*".
10. The Council, East Coker Parish Council (ECPC) and others also consider that the proposed layout is too regimented and fails to respond to the existing context of built development to the north and east. However, these matters are for consideration at the reserved matters stage and it would therefore not be appropriate for me to express a view on the design merits of the scheme.
11. The main parties disagree over the scale and nature of the impact of the proposed development on public viewpoints outside the appeal site.
12. The Appellant submitted a Landscape and Visual Impact Assessment (LVIA) in August 2012 and an updated LVIA in January 2015. These LVIAs came to the following conclusions:

- (i) Public views into the site are extremely limited; the principal public viewpoint is from the access track that links Holywell Lane at the Green Lane crossroads with Avalon House.
 - (ii) The proposed shelter belt at the south-west of the site will link the existing mature garden plantings and woodlands, creating a strong boundary to the urban edge.
13. The Appellant also relies on the Council's Yeovil Peripheral Landscape Study Addendum (YPLSA) (October 2013). It states that development in the Coker section of the Study (including the appeal site) "*would represent a consolidation and rounding off of the urban edge to the south-west of the town*".
14. The Council accepts that, in visual terms, the eastern part of the site would be acceptable in principle for residential development and from my observations, I agree. I therefore consider that the critical part of the site is the south-west third in terms of its landscape impact.
15. Although the Council agrees with the Appellant's LVIA, that there are very few immediate views of the site, it disagrees over the impact of the proposal on middle distance receptors (from 1-2 kilometres), especially where these are views from well used footpaths along the South Coker Ridge to the south. It is from this distance range where the Council considers that the full impact of the proposal on the setting of Yeovil can be observed.
16. The Council states that from these public viewpoints the proposed development would be seen as a clear projection from the well-defined edge of the town into its rural setting. It also states that the site has value in providing a clear edge to, and containment of, the town; and that it forms an important part of the 'breathing space' between Yeovil and the hamlet of Burton, two fields distant to the south-west, where the maintenance of the existing gap is considered to be essential to protect its character and distinctiveness.
17. Although the site is not protected by any national or local landscape policy designation, its openness and tranquillity are attractive features in themselves. The proposal would extend Yeovil's urban area into the open countryside, beyond what could be reasonably termed 'rounding off'. It was clear from the formal site visit that there would be direct views of the proposed development to and from the nearby hamlet of Burton. This would be exacerbated during the hours of darkness by lights from the houses, security lights, street lights and cars. Some of this impact could be mitigated by controlled light spillage by condition, were I to allow the appeal, but not to an acceptable degree.
18. From my observations, the views from the South Coker Ridge showed the site in a mixed woodland/open setting, and I am in no doubt that the proposal would be seen as an extension of the urban area, which would harm the setting of both Yeovil and Burton. Whilst some mitigation would be afforded by the landscaping proposals, including the shelter belt to the south-west, I consider that this would not satisfactorily mitigate the harm that I have identified.
19. The proposed development, therefore, would result in the loss of open countryside on the fringes of Yeovil. It would extend the urban area beyond any natural landscape boundaries, changing its character and appearance from rural to urban. I agree with both main parties that the impact on the

landscape would be 'moderate adverse', and with the Council that the impact on receptors in the middle distance would be 'moderate adverse', rather than 'low adverse' as argued by the Appellant. I therefore conclude that there would be harm to the landscape and setting of both Yeovil and Burton.

20. I note that the Local Plan Inspector's Report (IR) recommends deletion of submitted policy YV3, which identified a buffer zone between the South Yeovil SUE⁴. It is from the IR's reasoning, however, that, following the reduction in the size of the SUE, there would now be a 'gap' of countryside between the identified barrier and the urban extension, and I do not read into this that the setting of either the south-west edge of Yeovil or Burton are unimportant.
21. The proposed development would therefore be contrary to Local Plan policy EQ2, which promotes South Somerset's local distinctiveness and seeks to preserve or enhance the character and appearance of the district. This policy is essentially consistent with core principle 5 of *the Framework*⁵ which states that the harm to the intrinsic character and beauty of the countryside is a material planning consideration.

Issue 2 - Is the proposed development acceptable in terms of its effect on highway safety?

22. The key highway safety aspect is the impact of the proposed development on the road network, taking into account cumulative impacts from nearby future developments. ECPC and others express concern over the proximity of the proposal to the Keyford SUE, for 800 new dwellings, about 700m to the east, which would generate significant new traffic onto the highway network, including the A30, and the nearby roundabouts at Bunford Hollow, Quicksilver and Horsey. The SUE is committed in the adopted Local Plan.
23. The Appellant's submitted Transport Assessment (TA)⁶ states that all the junctions on the highway network in the vicinity of the appeal site would work satisfactorily with the extra growth of traffic envisaged from the proposed development. It states that this assessment is based on existing planning permissions plus an 'aspirational' figure, derived from national traffic growth forecasts, with trip rates obtained from the national TRICS data base.
24. However, in response to my questions, the Appellant was unable to demonstrate that the TA had factored in the Local Plan committed development at the Keyford SUE. In view of the significant size of this development, I am unable to conclude that the cumulative traffic impact from the proposed development would be acceptable, and neither can I be certain that the proposal would accord with paragraph 32 (3) of *the Framework*, which states that developments should be prevented where the residual cumulative impacts of development are severe. For the same reasons, I am not persuaded that the proposal would accord with Local Plan policy TA5, which requires that the nature and volume of traffic generated by new development should not compromise the safety and/or function of the local strategic road networks.
25. Moreover, there would be additional cumulative traffic impact on the A30 West Coker Road, immediately to the north of the appeal site, when the 80

⁴ Extract from Local Plan Inspector's Report (IR), paragraph 80 [Hearing Document 7].

⁵ DCLG: National Planning Policy Framework (*the Framework*); March 2012.

⁶ Transport Assessment (TA) Land to the East of Holywell, Yeovil; 30 April 2013.

additional homes which have been approved in principle at Bunford Heights are taken into consideration⁷.

26. In response to concerns over existing traffic speeds and safety, the Appellant's surveys show that the majority of traffic within the vicinity of the appeal site (at the 85th percentile) is travelling within the 30mph limit, and that the accident rate is low⁸, and I have no reason to question this. Concerns were raised that the changed priority regarding Nash Lane and the current spur road would add to the inconvenience of existing users of Nash Lane. However, I note that the proposed junction arrangement accords with national highways standards⁹ and has been endorsed by the Local Highway Authority.
27. On the basis of the above considerations, I cannot conclude with any certainty that the cumulative traffic impact of the proposed development has been taken into consideration in the Appellant's TA, especially in relation to the committed SUE at Keyford. This means that I cannot conclude that the residual cumulative impact on the local highway network will not be severe, and therefore I cannot be certain that the proposal is not contrary to national planning policy.

Issue 3 - Is the proposed development acceptable in terms of the loss of best and most versatile agricultural land?

28. There is no dispute that the appeal site comprises grade 1 agricultural land, as defined by the DEFRA Agricultural Land Classification. Paragraph 112 of *the Framework* states that where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of higher quality. There is no definition as to what constitutes 'significant development' in *the Framework*. In the context of a town the size of Yeovil, I consider the proposed development would be significant both in terms of the number of dwellings and the amount of agricultural land loss which would be required to make way for development.
29. Moreover, there is little evidence that the Appellant has investigated the use of areas of poorer quality agricultural land in preference to that of higher quality. The Appellant points out that there is a significant concentration of grade 1 and other best and most versatile (BMV) agricultural land to the south of Yeovil, and that even with the loss of the appeal site, there would still be a significant amount of BMV land remaining in the area. The Appellant also states that the site has limited agricultural yield ability due a number of factors, such as drought impact, nutrient loss, the small and irregular shape of the site, lack of irrigation and restricted crop choice.
30. Although Grade 1 agricultural land is widespread to the south of Yeovil, in the national context it is a relatively scarce and important resource, and the force of the requirements in *the Framework* does not therefore diminish in these circumstances. I do not find the shape of the appeal site particularly unusual or restrictive as an agricultural unit, whilst the other factors cited by the Appellant relate more to agricultural practice and management than to the intrinsic yield potential of the land itself. Therefore, I cannot give much weight to these site-related comments.

⁷ Decision Notice – see Hearing Document 12.

⁸ TA evidence – 2 severe accidents and 6 slight accidents occurred over the last 5 years – Appellant's Final Comments, paragraph 4.8.

⁹ Design Manual for Roads and Bridges (DMRB) and Manual for Streets (MfS).

31. The Council explained at the Hearing that the size of the Keyford SUE allocation in the Local Plan was reduced in part to minimise the loss of grade 1 land. The Council also suggested that there are opportunities to use previously developed land within the Urban Framework of Yeovil for housing, as advocated by Local Plan policy YV1, and this contention was not robustly challenged.
32. I therefore conclude that the loss of BMV agricultural land associated with the appeal development is not justified. It is contrary to paragraph 112 of *the Framework* and Local Plan policy EC1, which seeks to protect the best and most versatile agricultural land.

Issue 4 - Is any harm arising from the proposal outweighed by any benefits and the fact, as confirmed in the SCG, that the Council cannot demonstrate a five year supply of deliverable and available housing land?

The harmful impacts

33. I have already concluded, firstly that the proposal would result in harm to the landscape, especially in relation to the setting of the south-west edge of Yeovil and the hamlet of Burton; secondly, that I am not persuaded that the cumulative adverse impact on the highway network when considered in relation to the impact of the nearby Keyford SUE would not be severe; and thirdly, that the proposed development would result in a significant, avoidable and unacceptable loss of grade 1 agricultural land.
34. In addition, the Council, ECPC, CPRE and several local residents contend that the 'ad hoc' nature of the proposed development would undermine the spatial strategy of the recently adopted Local Plan, especially in relation to new housing and other development to the south of the town of Yeovil. They also state that this would result in uncertainty and unsustainable development, which would undermine both public and developer confidence in the Local Plan. I will address this matter before considering the arguments in favour of the proposal and then finally coming to a balanced judgment.
35. There is fundamental disagreement between the Appellant and the Council as to whether the scale of the proposed development and its location, to the south-west of the town, would be harmful to the strategy, sustainability and delivery of the recently adopted Local Plan¹⁰.
36. It is clear from the Local Plan Inspector's Report (IR)¹¹ that consideration of potential development sites on the periphery of Yeovil as part of the preparation of the Local Plan has been long and thorough, with considerable local community involvement. The IR records the debate as to whether the town's development interests were best served by concentrating peripheral growth on a couple of large extensions or whether greater weight should be placed on dispersing the proposed growth around the periphery of the town, in what was described as a 'necklace'. The appeal site was one of several sites put forward for consideration as part of this 'dispersal' approach.
37. The Council concluded that the dispersed, multi-site approach was not the appropriate way forward for the Local Plan and instead opted for two SUEs, including Keyford, about 700 m to the east of the appeal site, for 800

¹⁰ South Somerset Local Plan (2006-2028); adopted March 2015.

¹¹ Report on the Examination into the South Somerset Local Plan 2006-2028 (IR); 8 January 2015. [Appellant's Schedule of Appeal Documents Ref 1.2.2.]

dwelling. The IR gives several reasons for this, which are relevant to this appeal. In brief, they are that a multi-site approach (i) would not offer the same economies of scale associated with the two larger sites; (ii) would not enable the provision of appropriate facilities and services; (iii) would not significantly reduce the need to travel; and (iv) cumulatively may have undesirable impacts on the character of the landscape and on a number of historic assets. This strategic approach to growth was supported by the Sustainability Appraisal, which is described in the IR as a “*firm foundation on which decisions about the future growth of the town can be based*”. There is no more recent evidence to point to a different conclusion.

38. Although the proposal would offer contributions towards facilities and services, it does not provide easy answers regarding access to some of these facilities; for example, the lack of any robust consideration by the Appellant given to the ability of local schools to accommodate the demand for school places arising from the proposal and safe means of access was evident from the discussion at the Hearing. In contrast, the Keyford SUE includes provision for a primary school, along with a health centre and a neighbourhood centre, which would also help reduce the need to travel.
39. The submitted public transport evidence¹² shows an hourly frequency of local buses serving the proposed development on week days, and a reduced service at weekends. In my view this is insufficient to significantly reduce the need to travel by car, a key Local Plan objective, despite the inclusion of a residents’ travel plan. This is a critical consideration in Yeovil, which suffers from severe traffic congestion, which is likely to be exacerbated by primarily car-based peripheral housing developments such as the proposal before me. This contrasts with the Local Plan’s sustainable travel target of 30% of trips to be non-car in the SUEs as set out in policy YV5, reinforced by proposed Quality Bus Partnerships. Moreover, as I have already concluded, I am not persuaded that the Appellant’s TA has fully taken the traffic impact of the Keyford SUE on the highway network closest to the appeal site into consideration.
40. The Local Plan also ruled out the multi-site approach on the periphery of the town for reasons of harm to the landscape and loss of BMV agricultural land. I note that the submitted Local Plan initially proposed a single large SUE of 2,500 dwellings to the south of Yeovil, but this was amended to two smaller sites in the adopted Local Plan, including an 800 dwelling site in the south (and another 750 dwelling SUE to the north-east of the town). The Council explained at the Hearing that the reduction in the amount of new housing to the south of the town was made partly because of the need to protect as much grade 1 agricultural land as possible. The loss of BMV agricultural land on the appeal site would undermine the Local Plan strategy in this regard also.
41. I therefore consider that the proposed development would conflict with the recently adopted Local Plan, and undermine its sustainable development strategy.

The benefits

42. The proposal would provide up to 144 dwellings, including 35% affordable housing. This would contribute to the five year housing supply, which the Council acknowledges in the SCG it does not have, as required by paragraph 47

¹² See Hearing Document 8.

of *the Framework*. Therefore as paragraph 49 of *the Framework* states, the Local Plan is out of date regarding housing supply, although it does not ascribe the weight that should be given to policies in a plan which are out of date.

43. In this regard, my attention was drawn to an extract from a recent High Court Judgment¹³ wherein it is held that the weight to be given to the lack of a five year housing land supply will vary according to the circumstances. These include the extent to which the policies actually fall short of providing for the required five year supply, and the prospect of development soon coming forward to make up the shortfall. This consideration is relevant for the recently adopted South Somerset Local Plan.
44. The most recent 5 year housing land supply update (September 2015)¹⁴ shows the Council's current supply is just over 4 years and 4 months. There is also evidence that the rate of housing completions has increased in recent months, the latest at the time of the Hearing being for 80 dwellings at Bunford Heights, to the north of West Coker Road, almost opposite the appeal site¹⁵, whilst the Council's housing trajectory¹⁶ shows that there is a good prospect of development soon coming forward to make up the shortfall. Moreover, the Council stated at the Hearing its intention to commence an early review of the Local Plan, to be in place by March 2018, action which was set out in the above-mentioned 5 year Housing Land Supply Paper.
45. In light of the above considerations, I attach great weight to the lack of a five year housing supply by 8 months and the provision of 144 dwellings and affordable housing which would be likely to result from the proposal.

The sustainable balance

46. Paragraph 14 of *the Framework* places the presumption in favour of sustainable development at the heart of national planning policy. It sets out the parameters of the planning balance that have to be undertaken where the policies for the supply of housing cannot be considered up to date. It states that development proposals for housing should be approved where the five year supply cannot be demonstrated, unless (my underlining) 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.
47. In considering this balance, with reference to the dimensions to sustainable development set out in paragraph 7 of *the Framework*, I consider that the environmental harm can be summarised as harmful landscape impact and loss of grade 1 agricultural land. I conclude that they significantly and demonstrably outweigh the social and economic impacts of providing up to 144 new dwellings including 35% affordable housing, which would play a part in addressing the current shortfall of 8 months in meeting the housing land supply to achieve the 5 year target. In addition, for the reasons I have already

¹³ Extract from the High Court decision of Mr Justice Lindblom in *Crane v Secretary of State for Communities and Local Government* [2015] EWHC 425 (Admin) (paragraphs 71-73).

¹⁴ South Somerset District Council: Five Year Housing Land Supply Paper (September 2015) [Hearing Document 8].

¹⁵ Planning decision for residential development, associated landscaping, open space and new vehicular access (Application no. 13/01869/OUT) at land Adj. Bunford Hollow Roundabout, West Coker Road, Yeovil; dated 9 November 2015 [Hearing Document 12].

¹⁶ Hearing Document 17.

stated, I cannot conclude with any certainty that the traffic impact on the local highway network will not be severe.

Unilateral Undertaking

48. A signed and dated Unilateral Undertaking (UU) under Section 106 of the Act has been submitted. This commits the Appellant to providing 35% affordable housing, and financial contributions towards a community hall, cycleway, playing pitches, pre-school, primary school and secondary school places, a sports changing room and sports hall. The Council submitted a paper covering the justification of the planning obligations which are being sought on its behalf within the UU¹⁷. This detailed and comprehensive document argues soundly for the inclusion of all the above provisions and contributions in relation to the tests in paragraph 204 of *the Framework* and the 2010 CIL Regulations.
49. I therefore conclude, on the evidence before me, that the provisions and developer contributions in the UU would have been justified, in accordance with national policy criteria and the Local Plan, were I to allow the appeal.

Other considerations

50. Many local residents wrote letters against the proposal and some gave evidence at the Hearing. In addition to the issues which I have addressed above, several other points were made in opposition to the scheme.
51. Concerns were expressed over wildlife impact, and in particular there were criticisms of the Appellant's bat survey. There was no objection from Natural England or Somerset Wildlife Trust, whilst the Council's ecologist concluded that the site is unlikely to be of more than minimal importance for bats and a further bat survey would not be required. There is no countervailing evidence that leads me to disagree with these comments.
52. No objections were made by the Environment Agency or Wessex Water over drainage and flood risk and I can find no technical reasons to come to a different view. The impact of construction access, noise and length of working hours would be controlled by condition, had I been minded to allow the appeal. Impact on property values and loss of views are outside the remit of this appeal.

Conclusion

53. For the reasons I have explained, I do not find the proposal to be sustainable development, and I consider that the harm resulting from the proposed development would significantly and demonstrably outweigh the benefits it would bring, and it would therefore be contrary to national planning policy and the Local Plan. For the reasons given above and having regard to all other matters raised, I conclude that the appeal should fail.

Mike Fox

INSPECTOR

¹⁷ Justification on the Planning Obligations [Hearing Document 15].

APPEARANCES

FOR THE APPELLANT:

Ms Andrea Caplan	Associate Director, Brooke Smith Planning
Ms Elizabeth Hill	Managing Partner, Land Lizard Ltd
Mr Alan Bailes	The Transportation Consultancy
Mr Oliver Martin	Solicitor, Irwin Mitchell

FOR THE LOCAL PLANNING AUTHORITY:

Mr Simon Fox	Area Lead Officer (South), South Somerset District Council
Mr David Norris	Development Manager, South Somerset District Council
Mr Robert Archer	Landscape Architect, South Somerset District Council

INTERESTED PERSONS:

Mr Simon Williams	Footprint Futures, Planning & Regeneration, representing East Coker Parish Council
Mr Nicholas Whitsun-Jones	CPRE Somerset
Cllr Cathy Bakewell	South Somerset District Council
Mr Alan Harwood	Resident
Mrs Linda Harwood	Resident
Mr Chris Wright	Resident
Mrs Yvonne Wright	Resident
Ms Tracy Miles	Resident
Mr Lee Donald	Resident
Cllr Bridget Sugg	East Coker Parish Council
Mr Barrie Hartley	Resident

DOCUMENTS

1. Record of Attendance.
2. Notification Letter.
3. Letter from J Brunsdon, dated 17 November 2015.
4. Letter from Mr Lee Donald, dated 18 November 2015.
5. Letter from Marcus Fysh MP, Yeovil Constituency, dated 16 November 2015.
6. Letter from Tracy Miles, dated 24 October 2015.
7. Extract from South Somerset Local Plan Inspector's Report, dated 8 January 2015 (paragraph 80 dealing with East Coker and North Coker Buffer Zone).
8. South Somerset District Council: Five year Housing Land Supply Paper, dated September 2015.
9. Information on bus services at Yeovil Court Hotel, dated January 2014.

10. Summary of High Court decision of Mr Justice Lindblom in: Crane v Secretary of State for Communities and Local Government [2015] EWHC 425 [Admin], submitted by CPRE Somerset Branch.
11. Aerial photograph of South Yeovil, showing appeal site, site of recent planning permission at Land Adj. Bunford Hollow Roundabout, West Coker Road, and site of Keyford SUE.
12. Decision Notice, granting permission for residential development, associated landscaping, open space and new vehicular access on Land Adj. Bunford Hollow Roundabout, West Coker Road, Yeovil (Application No. 13/01869/OUT), dated 9 November 2013.
13. Application for Costs by the Appellant, dated November 2015.
14. Appendix 3 to the Statement of Common Ground, setting out suggested conditions.
15. Justification on the Planning Obligations being sought on behalf of South Somerset District Council; Application Reference 13/01791/OUT, submitted by the Council.
16. Costs rebuttal on behalf of South Somerset District Council; Application reference 13/01791/OUT.
17. Supplementary Information on Housing Trajectory on behalf of South Somerset District Council.
18. Clarification of References to NPPG on behalf of South Somerset District Council.
19. Appellant's Final Comment on Cost Application.

Richborough Estates