

**From:** [Mannings, Ed](#)  
**To:** [Strategy](#)  
**Cc:** [Crew, Mary](#)  
**Subject:** Stantec - Regulation 18 Issues and Options Consultation - Representations on Behalf of Huntworth Properties  
**Date:** 16 March 2020 16:04:34

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Dear Sir/Madam

Please see the attached representations submitted on behalf of our client, Huntworth Properties.

I would be grateful if you could confirm you have received this email and the attached documents for our records.

## Ed Mannings

Planner

[Bristol](#)

Direct: +44 (0)117 3327917

[ed.mannings@stantec.com](mailto:ed.mannings@stantec.com)



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## **Dillons Road, Creech St Michael**

**Somerset West and Taunton Local Plan Consultation (REG 18)**

On behalf of **Huntworth Properties**

Project Ref: 487454/001 | Rev: AA | Date: March 2020

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Registered Office: Buckingham Court Kingsmead Business Park, London Road, High Wycombe, Buckinghamshire, HP11 1JU  
Office Address:

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	Name	Position	Signature	Date
<b>Prepared by:</b>	Elliot Domett	Planning Technician	ED	March 2020
	Ed Mannings	Planner	EM	March 2020
<b>Reviewed by:</b>	Mary Crew	Associate	MC	March 2020
<b>Approved by:</b>	Bernard Greep	Director	BG	March 2020
<b>For and on behalf of Stantec UK Limited</b>				

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A	March 2020	Somerset West and Taunton Local Plan Consultation (REG 18)	ED	MC	BG

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# 1 Introduction

## 1.1 Background

- 1.1.1 Stantec submit these representations to Somerset West and Taunton Council (SWTC) on behalf of our client, Huntworth Properties. These comments are made within Huntworth Properties' capacity as landowners of Land Adjacent to Dillons Road (the Site) which is located on the built-up urban edge of Creech St Michael.
- 1.1.2 Huntworth Properties entered the details of the Site within the 2019 Call for Sites process indicating that it is available for residential development. The Site is approximately 1.45 ha in area and has the capacity for approximately 20 dwellings. It is situated less than 200m from the Village Centre and immediately east of existing development at Dillons Road.
- 1.1.3 As well as its location close to the village centre, the site is served well by the facilities and services of Creech St Michael which include regular bus services between Wells and Taunton, a SPAR convenience store, a vet, and a primary school. The site is proposed to be accessed via the existing stub at the southern end of Dillons Road. Dillons Road connects to St Michaels Road which is the main route through the village of Creech St Michael.
- 1.1.4 Considering the sustainable location of the Site within Creech St Michael, Huntworth Properties are looking to establish the long-term future use of the Site for housing and are seeking to engage with SWTC and the Local Plan process to do so.

### **Structure of these Representations**

These representations address the following questions laid out in the Issues and Options consultation paper:

- Plan Objectives and Option 1C: Policy Approach Towards Carbon Neutrality
  - Option 3A: Providing the Right Amount of New Homes
  - Option 2A: Settlement Hierarchy
  - Option 2C: Housing Distribution
  - Option 8A: Settlement Boundaries
- 1.1.5 For ease of reference, a summary is included in Section 3.

## 2 Representations

### 2.1 Plan Objectives and Options Question 1C: Policy Approach

- 2.1.1 We are generally supportive of the policy direction of the plan. However, to achieve the intended long-term outcomes, the Local Plan will need to form a coherent strategy, which has only to date has only been touched on in part through the published Sustainability Appraisal and Local Plan Topic Papers 1 and 2.
- 2.1.2 Principles and recommendations on how to refine the proposed policy approach are discussed in detail throughout these representations, however the desired outcomes can be summarised as follows:
- Effective recognition that settlements in Taunton Deane perform a different role to the settlements in Somerset West and these differences should be reflected in a realistic and sustainable modal for future growth, including:
    - Recognition of population and labour trends and latest travel to work patterns between the two former authority areas to optimise the opportunity for sustainable growth in and around Taunton and dissuade sole reliance on the motor car (1C/1).
    - Recognition of the differing existing and potential levels of public transport across the new local authority area (1C/1 and 1C/3).
    - Encouragement of a positive strategy for housing growth beyond the current Standard Method, focused in areas of recent or emerging employment, service and infrastructure growth, to create a coordinated approach to economic growth and placemaking within the plan period (1C/1).
    - Recognition of the future role of small and medium-sized settlements around Taunton that benefit from existing and planned infrastructure improvements, which could lead to neighbourhood scale-sustainability improvements, including the support for new and existing local services (1C/3).
  - A mixed approach to land allocations (land release and new opportunities) and settlement boundaries rooted in the overarching objectives of the Local Plan and market demand.
- 2.1.3 The approach outlined above would align with the proposed objectives 2,4,5,6 and 9 and reflect a plan-led approach if supported by appropriate positive planning policy wording.

### 2.2 Options Question 3A: Providing the Right Number of New Homes

#### Option 1. Using the Standard Method for Calculating Housing Need

- 2.2.1 The current starting point for calculating housing need for the apportioning of housing growth within the new plan period is rightly identified as the Standard Method for Housing Need. The consultation paper suggests a level of 702 dwellings per annum.
- 2.2.2 We have run a separate version of the calculation below for both former authorities to calculate a final figure in the Local Plan.
- Taunton*
- 2.2.3 In accordance with the current Standard Method, the 2014-based household projections (by district) are the basis for the calculation of housing need. The household projections for the base year of 2020 are 51,868. The annual figure should be derived from the projected change

in any ten-year period starting from the base date. The household projections for 2030 are 56,587, establishing a projected difference of 4,719 households in the ten-year period (472 dwellings per annum).

- 2.2.4 The standard method aims to increase the supply of housing in those areas which are least affordable by applying an adjustment factor based on the ratio of median average wages against median house prices in a relevant district. In 2018, median house prices in Taunton Deane were 8.53 times median average wages. Using step two of the standard method  $((8.53-4)/4*0.25+1)$ , the adjustment factor in Taunton Deane is currently 1.2831. This produces a minimum housing figure of 606 dwellings per annum for Taunton Deane  $(472*1.2831)$ .
- 2.2.5 It is noted that no cap would apply to housing growth as the minimum housing need figure is below that previously adopted in the Taunton Deane Core Strategy (912 dwellings per annum in 2012).

#### *West Somerset*

- 2.2.6 The household projections for the base year of 2020 are 15,895. The annual figure should be derived from the projected change in any ten-year period starting from the base date. The household projections for 2030 are 16,729, establishing a projected difference of 6,400 households in the ten-year period (84 dwellings per annum).
- 2.2.7 The former West Somerset District authority does not have an up to date housing affordability ratio. Therefore, to calculate the potential affordability adjustment, we have provided a range considering the following variations based on comparable data:
- Affordability ratio set in accordance with Taunton (8.53). This would lead to minimum annual housing need of 107 dwellings.
  - Affordability ratio set at the same level as the ratio for lower quartile housing against lower quartile wages in West Somerset (9.86). This would lead to a minimum annual housing need of 114 dwellings.
  - Affordability ratio set in accordance with neighbouring South Somerset (8.19). This would lead to minimum annual housing need of 105 dwellings.
- 2.2.8 As all of these variations would lead to a reduced housing need requirement against the adopted Local Plan which sets a minimum requirement for 182 dwellings per annum, thus no cap is required. Therefore, the annual minimum housing need for West Somerset is currently considered to be between 105 and 114 dwellings.

#### *Somerset West and Taunton*

- 2.2.9 Based on the above, we believe the minimum housing need requirement for the plan is between 711 and 720 dwellings. It is unclear seeing where the disparity between the suggested figure and the above figure originates as there is currently no housing topic paper showing how the 702 dwellings per annum figure was calculated. However, this may be due to using a different base date for the calculation or the assumptions used as the basis of the affordability ratio for West Somerset. We would not support this approach as it does not reflect the ambitions of the Local Authority and would not represent positive plan making.
- 2.2.10 According to our calculations the 20-year plan period should be based around a minimum figure of between 14,200 and 14,380 dwellings. This represents an uplift of up to 340 dwellings over the whole plan period from the consultation figure. This is fairly modest when considered against the significantly higher growth targets of both the authorities' previous plans and would represent a slow-down in ambitions for growth within the new authority area.

We would not support this approach as it does not reflect the ambitions of the Local Authority and would not represent positive plan making.

- 2.2.11 Notwithstanding this, if a Standard Methodology approach is progressed for the purpose of the Local Plan, SWTC should consider the following:
- a) Provide a topic paper showing the final calculation of housing need, for the consultation stage of the draft Local Plan.
  - b) Be aware that the Standard Method is expected to be revised this year with the release of new national household projections expected in the summer. The reworking of the Standard Method is likely to increase housing need requirements to align with the government's target of building 300,000 homes a year by 2025.
  - c) Be aware that if the revised Standard Method is applied at the time of draft plan going to examination, the current calculation figure will no longer apply.
- 2.2.12 Due to the above points, we suggest that if SWTC is minded to use the Standard Method, the draft plan should accommodate for a target which is over and above the current Standard Method housing figure to provide resilience through the plan making process.

### **Option 2. Planning for more Ambitious Growth**

- 2.2.13 Currently the Standard Method for calculating housing need for the New Local Plan would reflect a significant change in direction for growth from the current Taunton Deane Core Strategy and West Somerset Local Plan. Aligning growth to the current Standard Method would see a reduction in the housing requirement for authority of up to 392 dwellings a year from adoption of the new plan.
- 2.2.14 Given the extent of this reduction and disparity with both past growth and the current ambitions of the Heart of the South West Local Enterprise Partnership, we support SWTC's suggested approach to provide a robust assessment to calculate an alternative housing need figure as presented in Option 3a(ii). This assessment should be published as part of the next consultation on the draft plan.

## **2.3 Options Question 2A: Settlement Hierarchy**

- 2.3.1 The proposed settlement hierarchy and housing strategy has been produced through testing the two separate former districts' policies against each other and then the potential objectives of the plan which have also been subjected to options testing in the initial sustainability appraisal. Although this approach is logical considering the combining of the two authority areas, it leaves gaps in providing an up to date assessment of a single strategic authority area.
- 2.3.2 The limitations of the existing evidence in the topic paper are acknowledged in the Housing Strategy Topic Paper itself (see pg.3 and pg.27) which lists the following variables and factors that have not been considered, but will need to be, before defining a final settlement hierarchy:
- a) Up-to-date population and household estimates and projections.
  - b) A scale of new dwellings required in the new Local Plan review period to 2040.
  - c) Housing delivery rates, completion data and other housing market assessment data.
  - d) Up-to-date housing needs assessment / objective assessment of need.
  - e) Up-to-date strategic housing land availability (land supply) data.

- f) Travel time to next tier of settlement for residents to access a greater / higher level of services and facilities.
- g) Carbon and other emissions arising from transport.
- h) Retail offer and vacancy rates.
- i) Employment land and premises (economic) offer.
- j) Travel-to-work areas / functional economic areas.
- k) Infrastructure (transport accessibility and connectivity).
- l) Public transport services.
- m) Sports, leisure and recreation services and facilities.
- n) Education offer.
- o) Green infrastructure network.
- p) Arts and cultural offer.
- q) Health services and facilities available.
- r) Environmental protections, opportunities and constraints.
- s) Heritage assets and the historic environment.

2.3.3 We are sure this work will be undertaken and are pleased that this consultation will help inform future policy direction. However, in the interim, the settlement hierarchy is not reflective of a full assessment of the current base line condition of existing settlements and the strategic, local and neighbourhood interrelationships between settlements. It also does not reflect the constraints across the district which meaning (at present) using it as a baseline for the distribution of housing is challenging.

2.3.4 This is particularly the case with the number of villages (31) and rural minor rural centres (13). There are clear variations and exceptional cases which will need to be considered in future draft plans, particularly those settlements closest to Taunton Deane where there is the opportunity for sustainable linkages. Within these settlements which, in most instances, serve as satellites of the Strategic Growth Garden Town, the approach could be to allocate individual sites, as exceptions, to support Taunton's growth. Alternatively, an approach could be to raise such settlements upwards within the settlement hierarchy.

2.3.5 Another alternate approach could be to remove villages from Tier 6 which are unlikely to support future growth as these settlements would then automatically be considered as Tier 7 settlements. If the current approach is geared to deliver growth in all of these locations, it may mean dispersal to too many settlements rather than focused growth in the most sustainable locations for new homes. A review of the most sustainable locations is further explored in our response to Option Question 2C.

### **The Strategic Role of Taunton**

2.3.6 The Housing Strategy Topic Paper rightly identifies Taunton as the main focus for residential growth within the plan area in line with its position in the existing Taunton Deane Core Strategy. Taunton is and will be the focus of future employment growth and residential

housing demand due to its existing services and strategic rail and road connections which are unique within the context of SWT.

- 2.3.7 The results of the most recent Housing Delivery Test (2019) suggest that, among other things, development in and around Taunton may be more viable than in West Somerset. West Somerset has only delivered 80% of its forecast housing delivery for the last three years, whereas, in the same time period, Taunton Deane delivered 150% of its forecast delivery. Over the same time period, the ratio of average earnings to average house price has continued to rise in Taunton Deane year on year, suggesting there is potential existing pent up demand before any consideration of future employment delivery.
- 2.3.8 We agree that to deliver a realistic and positive strategy across the local authority area, SWTC should concentrate on opportunities to maximise housing development both in and around Taunton. An appropriate approach would be to prioritise new opportunities for people to live close to where they work where, and where sustainable transport linkages already exist/are planned. This includes consideration of existing connectivity to the M5 and A358 which provide the main connections in and out of Taunton from Sedgemoor and South Somerset. Such an approach is not a dissimilar to that within Taunton Deane's current adopted Core Strategy. The difference being that now there is a further opportunity, under a single unitary authority, whereby Taunton can take an elevated amount of growth from smaller settlements in West Somerset relative to its greater service and employment function.
- 2.3.9 We suggest that Creech St Michael remains a sustainable location for small and medium housing sites and an opportunity exists at the Site to develop homes on a contained site within the natural enclosure of Creech St. Michael. Development of the site would it is just 200m from the Village Centre, which is served by the '29' regional bus from Wells into Taunton Town Centre via the Nexus 25 employment site.
- 2.3.10 Creech St Michael is in close proximity to Taunton, therefore benefiting from its service infrastructure and employment opportunities (including Blackbrook Business Park, Monkton Heathfield Community School and 2 GP practices within 3km). Creech St Michael also benefits from existing proximity to neighbourhood services, including a primary school (400m), post office /convenience store (150m), village hall (120km), pub (190m) and church (200m).

### **Minor Rural Centres**

- 2.3.11 The current hierarchy includes three different levels of rural centre which sit above tier 6 villages. The logic behind categorisation is not clearly stated in the housing topic paper. However, it would appear to be driven by a first attempt to amalgamate the role of villages in the adopted Somerset West Core Strategy with the role of villages in the Taunton Deane Core Strategy.
- 2.3.12 Although the categorisation of the majority of settlements is not disputed and reflects the current general role and function of places within their surrounding local context, it is not clear whether it is suitable for reflecting the future role and function of different settlements and their individual level of economic growth pressures. This is particularly the case for Villages and Minor Rural Centres where some settlements may be more far suitable than others for sustainable growth due to their proximity to strategic infrastructure and employment opportunities.
- 2.3.13 To put this in context, the Standard Method suggests that the minimum housing requirement within Taunton Deane should represent around 83% of future provision within the overall Plan area. This is rightfully steered towards Taunton and Wellington as the main centres for growth in the local authority area. However, this proportioning of growth should also be reflected in the allocation of housing to "rural centres" and "villages" where there are opportunities for sustainable development, including linkages to Taunton and other major employment sites.

- 2.3.14 This should be part of a broader strategic approach which allows for some high-density brownfield infill development in Taunton Town Centre, but avoids reliance on such development alongside existing strategic extensions at Taunton. The strategy should also recognise appropriate settlement-based policies which establish opportunities for sustainable growth around Taunton. We suggest that these policies include a mix of small and medium sized allocations in locations around Taunton where linkages exist, such as in the case of Creech St Michael which is well connected to Taunton through Langaller and the newly aligned A38, or through Ruishton and the A358. More significantly though, the green infrastructure along the Bridgwater and Taunton Canal and the River Tone provides pedestrian and cycle links through a 'green wedge' and into the town centre. Furthermore, there is a regular bus service which provides a direct link to the town.
- 2.3.15 In the Issues and Options Consultation Document, Creech St Michael is identified as a 'Minor Rural Centre', we agree that Creech St Michael is a sustainable location for residential development over the new plan period. Not only this, but SWTC are aware it is a "higher order settlement" with development pressure, as indicated in Topic Paper 2. We agree that it is a suitable location for housing growth, and due to its proximity to existing service infrastructure and the Strategic Growth Garden Town of Taunton, it provides opportunities for sustainable development. This is further supported by direct and short public transport linkages to Taunton, a strong sports, leisure and recreation offer when compared to other Minor Rural Centres, and excellent green infrastructure linkages to the surrounding (and wider) area, including the urban extension of Monkton Heathfield.
- 2.3.16 We suggest that the new Local Plan should include allocated sites in Creech St Michael to enable the plan led growth of the settlement. Due to the size of these sites, there is the opportunity for deliverable sites to be identified for inclusion early in the Local Plan's housing trajectory. The Site provides such an opportunity, with the only current constraint being that it is located immediately adjacent, but outside of the existing adopted settlement boundary. We suggest that once sites are allocated, a review of settlement boundaries is undertaken to include future development sites. This is considered further in our response to Option Question 8A.
- 2.3.17 Using the Standard Method as a guide, the remainder of housing provision (around 17%) would be located in Somerset West, the majority of which would be located at Williton and Watchet as the locations closest to employment growth. A limited amount of growth is apportioned to villages and other settlements which have limited access to the strategic transport network and employment opportunities and have a generally lower working age population (ONS, 2018).

## 2.4 Options Question 2C: Housing Distribution

- 2.4.1 Taunton has seen a sustained year on year worsening of median affordability wages to house prices, rising from 7.13 times average earnings in 2009 to 8.53 average earnings in 2018. This rise has continued in the last three years despite delivery results showing a 150% suggesting there is still pent up demand for housing in and around Taunton.
- 2.4.2 Consequently, we believe that Taunton's satellite villages, identified as 'Minor Rural Centres' and 'Primary Villages', closer to the M5 corridor could accommodate a larger amount of development. This aligns with the potential distribution of housing identified in Option 2c (vi) however, it is not just 'higher land values' and the 'ability to deliver new housing' which underpin this approach, but also the ability to promote sustainable growth in the district by developing in locations with shorter, direct commuting distances Taunton, which are supported by public transport. By reducing travel to work distances and focussing development around Taunton, sustainable modes of transport become more feasible for the future population who will not need to travel so far.
- 2.4.3 Furthermore, allocating a range of small and medium sized, contained sites in these settlements reduces reliance on large, phased or brownfield sites to meet the housing target.

Delivery of such sites can often be delayed or stall completely. In fact, the NPPF stresses the important contribution small and medium sized sites can make to meeting the housing requirement of an area in paragraph 68:

*“Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly.”*

- 2.4.4 We believe that small and medium sized allocations could play a significant role in maintaining a consistent baseline of housing delivery, owing to their quicker delivery, which would support the gradual release of housing at Taunton’s Garden Communities. The NPPF suggests a suitable housing distribution for small and medium sites is 10%. We strongly believe that this number should be higher in SWTC, specifically in Taunton’s satellite villages. In these and other rural locations, there are bountiful opportunities presented in the 2019 SHLAA for deliverable, unconstrained and contained small sites which would not only protect the vitality of the villages but encourage their sustainable growth over the plan period.

## **2.5 Option Question 8A: Managing Development in Rural Settlements**

- 2.5.1 Stantec support the use of settlement boundaries in Somerset West and Taunton and believe that Option 8a (i) is the most appropriate method to manage development in rural settlements. This is partly to provide a compact form to settlements and prevent unplanned sprawl into the open countryside, but mostly to ensure a plan-led approach to future housing growth. We believe that where settlements are appropriate and sustainable locations for growth, housing allocations are the most effective way to guide sustainable growth in the correct locations.
- 2.5.2 This new Local Plan provides the opportunity to review Policy SB1 of the Taunton Deane Core Strategy and, as indicated in paragraph 6.2 of the 2019 Taunton Deane SHLAA, it follows that some ‘potentially developable sites’ could then be considered suitable for development if land is required in that particular area.
- 2.5.3 Based on the current findings of the SHLAA there are no deliverable brownfield or greenfield sites within the adopted settlement boundary for Creech St Michael. To demonstrate enough capacity for growth over the plan period, including new allocations, the currently adopted settlement boundary could be revised to reflect planned growth. We suggest that this includes that Site which forms a logical extension to the existing urban form.
- 2.5.4 MIN067 Land adjacent to Dillons Road is suitable for inclusion within a revised settlement boundary for Creech St Michael. It is suitable Site for inclusion in the Local Plan due to the natural enclosure provided by the hedge line to the east and north, in combination with a natural extension of Vicarage Lane along the alignment of rear gardens along Ryesland Way. This enclosure provides a clear delineation between Creech St Michael’s urban form and the open countryside and therefore would not undermine the objectives of a settlement boundary policy.

### 3 Summary

Option Question/Topic	Summary
3A: The right amount of new homes	<ul style="list-style-type: none"> <li>Support the suggested use of a full housing needs assessment (beyond the Standard Method) establish the number of new homes (option 3a ii).</li> <li>Standard Method calculation or housing needs assessment report should be published as part of the next consultation.</li> <li>If the Standard Method is used, a buffer should be used to protect the plan from expected changes in the method this year to uplift housing delivery nationally to 300,000 homes a year by 2025.</li> </ul>
2A: Settlement Hierarchy	<ul style="list-style-type: none"> <li>Further work is required to refine the settlements beyond the top tiers. There are too many settlements included in the hierarchy leading to over dispersal at the lower levels rather than enabling distribution to the most sustainable locations for new homes.</li> <li>While some West Somerset settlements have an important community/service role due to their isolated nature, it does not mean they have the same opportunity for growth as settlements in and around Taunton which have strong links to public transport and the strategic road network. This should be reflected in the hierarchy if it is to be the baseline for future housing growth, or, if not, in the pattern for housing distribution.</li> <li>We support the identification of Creech St Michael as a Minor Rural Centre.</li> </ul>
2C: Housing Distribution	<ul style="list-style-type: none"> <li>Growth should be skewed towards Taunton Deane, including development in villages with good access to facilities/ connections to Taunton and the strategic road network</li> <li>Creech St Michael can support top tier housing growth due to its connectivity with Taunton and the present level of existing community services and facilities in the settlement.</li> <li>Allocation of small and medium sized will support housing delivery throughout the plan period as indicated in the NPPF.</li> </ul>
8A: Manging Development in Rural Settlements	<ul style="list-style-type: none"> <li>Support the use of settlement boundaries (option 8a (i) as part of a planned approach to sustainable development.</li> <li>There are currently no sites which are considered as “developable” within the 2019 SHLAA which are within the adopted settlement boundary of Creech St Michael and the adopted settlement boundary currently forms a policy constraint to small sites adjacent to the settlement.</li> <li>The Local Plan review provides the opportunity to revise adopted settlement boundaries to include suitable sites as allocations to enable sustainable growth within the new plan period.</li> <li>Land adjacent to Dillons Road is a suitable, logical and unconstrained site within the natural enclosure of Creech St Michael that could accommodate a part of the settlement’s future growth strategy.</li> </ul>