

LDF PMB and MAG Combined Group

Core Strategy Workshop 7

September 14th 2011 – Sustainability Appraisal report Report by Keith Lane Policy Planner

Sustainability Appraisal (SA) involves the identification and evaluation of the impacts of the Core Strategy upon social, economic, and environmental objectives – i.e. its compatibility with the three strands of sustainable development. Under the Planning and Compulsory Purchase Act 2004, the Core Strategy must be subject to SA. This incorporates the requirements of European law.¹

An SA report was published for consultation alongside the draft Core Strategy (incorporating preferred options) in October 2010. This included the SA outcomes of the preferred options policies, directions of growth at the main settlements, and options for the distribution of development across the District.

The purpose of this briefing report is to highlight the key issues raised in comments on the preferred options SA report; and to set out the additional SA work that is required to be produced in tandem with the 'Publication' Core Strategy.

Issues

A total of 83 comments were made specifically on the Sustainability Appraisal report, the vast majority of which concerned the proposed Yeovil urban extension. The key issues raised in consultation on the Sustainability Appraisal are set out below:

General

- By concentrating development on Yeovil, Market Towns and Rural Centres, the problem of deprived rural communities will be exacerbated.
- Development should be spread throughout the district as this would negate the need for urban extensions and the consequent adverse effects on the main towns.
- The SA does not comply with the necessary regulations.
- The SA has not taken impact on the historic environment into account e.g. incomplete and out of date evidence base with no overall sensitivity of the District's heritage; no explanation of how the historic environment would evolve without the plan; inappropriate indicators.
- No discussion of generic primary effects, let alone secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects.
- SA is subjective rather than being based upon evidence.

Yeovil

Criticisms were made against each of the 14 SA objectives opposing the identification of the Keyford/Coker area as the preferred location of the urban extension, as summarised below.

- Obj. 1: Hospital, college and schools are located nearer to the north of the town.
- Obj. 2: Yeovil East is the main deprived ward and therefore would benefit most if urban extension is to the east or north. 3 out of 4 areas of deprivation are within the urban area, only 1 on the edge of East Coker yet this area scored best.
- Obj. 3: an urban extension for 3,700 dwellings should be scored negatively.

¹ Directive 2001/42/EC, transposed into UK law by the SEA Regulations 2004.

- Obj. 4: opportunities for walking and cycling to work and leisure are unlikely to be achieved.
- Obj. 5: focuses on locating a secondary school in the south of the town with no reference to new primary schools in key sites.
- Obj. 6: street lighting to reduce crime/fear of crime will cause light pollution and be costly. Score should be neutral or negative, not positive.
- Obj. 7: no reference is made to employment at RNAS Yeovilton which mean that northern options should score higher.
- Obj. 8: topography (i.e. Hendford Hill) will discourage people from walking and cycling to the town centre from the southern option. Bus and cycle routes already exist in the north and through the key site developments. Roads in south are not suitable to cope with increased traffic. Misleading to say that development will bring Yeovil Junction into the town.
- Obj. 9: should not score positively as development will wreck the landscape, considers long views in northern options but not south.
- Obj. 10: should be negative effect due to presence of Grade I listed Naish Priory, Roman villa Scheduled Ancient Monument, Historic Park and Garden, East Coker/North Coker Conservation Area, East Coker is an Outstanding Heritage Settlement in Structure Plan. English Heritage has reservations regarding the Yeovil Historic Environmental Assessment.
- Obj. 11: passive solar gain is over estimated – no reason why houses to the north of Yeovil should not benefit from solar gain. An energy centre could be developed in the north.
- Obj. 12: loss of Grade 1 Agricultural land is understated.
- Obj. 13: area around Keyford to Coker Marsh is prone to flooding. Flood risk is greater in the south than the north. Sustainable Drainage Systems (SUDS) do not effectively mitigate against flooding.
- Obj. 14: not clear why north is given a negative effect, as there is little biodiversity interest here, whilst there is presence in the south.

Chard

- Chard SA has underplayed the sustainability credentials of land at Snowdon Farm – this should be in phase 1. SA simply tests the 4 set options without considering other alternative approaches or site phasing.

Crewkerne

- Much of the plan is contradictory e.g. improve access to services – proposal to close recycling facility; reduce crime/fear of crime – police stations are being closed; provide sufficient housing – but give priority to dormice.

Somerton

- A series of small developments should be built in all 3 options, rather than only option 2, as developing only option 2 would create ribbon development and increase traffic, parking in centre, carbon footprint.
- Option 1 is constrained by the river corridor, which represents a significant flood risk.
- Option 2 is strongly supported as it is adjacent to the main route from the west and has great potential to enhance the gateway into Somerton and provide a new and better defined edge to the town.
- Option 3 is largely constrained by landscape characteristics and restricted highways junction; any residual elements would be too small to deliver appropriate growth in Somerton.

Wincanton

- Option 1 – disagree that shops and facilities are accessible by walking and cycling due to steep topography.
- Option 1 – significant impact on wildlife, adverse landscape impact, adverse historic environment impact (Grade II listed farmhouse), and additional development will lead to flood risk.
- Option 4 is better related to the town centre than Option 1 – a more balanced approach incorporating both options is required.

Bruton

- As Bruton's geography is completely different to other Rural Centres, the SA report is of little assistance to Bruton.

Ilchester

- There is a lack of evidence to support the scoring, especially in relation to Ilchester, making it flawed and not credible.

Response

General

Yeovil is the economic driver in the district, with around 50% of jobs in South Somerset currently located in Yeovil. There are economic benefits in supporting Yeovil's role by ensuring provision is made for sufficient homes at the town for workers, whilst allowing appropriate development elsewhere subject to being of appropriate scale and type. A dispersed approach to development is likely to lead to mostly negative effects e.g. lack of access to jobs and services, necessitating travel and increased CO2 emissions.

The SA has been prepared in accordance with the necessary regulations and the final SA report will clearly identify how and where the statutory regulations have been met, and issued alongside the 'publication' Core Strategy. The different 'types' of effect were included in the 'commentary' column, and appraised against baseline evidence.

The key aspects of South Somerset's historic environment are set out in the Scoping Report which identifies the historic environment as being of high quality and experiencing good protection, with numerous Conservation Areas and listed buildings – this further detail will be included in the final SA report. The objective on the historic environment has meant it has been specifically considered in appraising policies and comparing options.

Yeovil

Yeovil College / Hospital are located in the centre of the town while the town's secondary schools are distributed mainly to the north and east – amend SA to reflect the hospital's central location. Development proposals seek to address identified housing need so this should be scored positively, but agree that further explanation is required regarding housing need and population projections. The SA makes reference to existing primary and secondary school education within the town and its distribution generally to the north. Addressing this secondary school imbalance is considered an advantage for growth in the south of the town, but agree that 16+ education at Yeovil College, University Centre & skills centre should be given further discussion in re-appraising the SA at 'Publication' stage. Lighting is only one factor in reducing crime and that design is another key consideration e.g. new development can help reduce crime by following 'secure by design' principles, which is why a positive score is given.

Regarding employment, the northern options have been scored to reflect their proximity to the Lufton / Houndstone Industrial Estate and good access to the A37/A303. Access to Yeovilton is not considered a benefit to the northern options as this major employment site is located out of the town and would therefore encourage commuting. Disagree that there are more employment areas to the north of the town as opposed to the south.

The East Coker / Keyford / Barwick site is located close to the town centre and other employment and transport hubs and therefore represents a more sustainable location for development in public transport terms than other options. The SA makes reference to 'significant topographical barriers to travel that will certainly increase journey time of walkers and cyclists' between this location and the town centre. The East Coker / Keyford / Barwick site does benefit from its proximity to Yeovil Junction train station and presents a real opportunity to improve access to the train station through new development that incorporates footpaths and cycle routes as well as enhanced public transport. All the directions for growth around Yeovil have undergone extensive traffic modelling to determine the likely impact of new development on the existing highways network. Where traffic congestion is identified key infrastructure improvements to roundabout / junctions and their costs have been identified.

The SA explains that although development on the south of Yeovil has the potential to impact on the Dorset Hills above Sherborne in the east to Rimpisham in the west as well as Coker ridge it is considered that from such long views the impact would be minimal, indeed as the southern ridge already has a built context to the south of Coker Road and across the A37, new development could be more easily encompassed than a northern option. From closer views at East Coker it is considered that the low trajectory would screen development. It is considered that effective screening can be achieved in the south of Yeovil.

SA Objective 10 does not say that there will be no detrimental impact of development on the historic environment indeed it scores three of the four options as having a significant negative effect, but the SA recommends mitigation measures can be used to sensitively incorporate historic features into the development and is therefore given a neutral score. The loss of Grade 1 agricultural land is considered. There is sufficient land outside areas of medium-high flood risk on both the north and south of Yeovil and SUDS are considered effective at mitigating flood risk.

The Renewable Energy Study by Brooks Devlin / Font energy identified Solar PV as a small but important part of the renewable energy mix for the Yeovil Urban Extension. Solar PV works at its most efficient in a due Southern direction and for this reason southern slopes are preferred. Solar panels will work in other directions but at a significantly reduced efficiency. North sloping sites are not well suited to solar PV as they increase the likelihood of over shadow. This study also identifies areas to the Northwest & South west as being the most suitable location for a renewable energy centre.

Chard

The 4 growth Options for Chard arose out of the work undertaken by consultants LDA as part of the Chard Regeneration Framework and are based on growth scenarios that were considered to be generally viable and would best meet the future growth needs of the town and minimise the impact on the existing road network. The land at Snowdon Farm was included as part of Option 4 - Growth to Natural Limits, which if taken forward results in significant increases in traffic congestion on several key junctions throughout the town. The SA also identifies a significant negative

impact on sustainability Objective 12 for this option. The Snowdon Farm site was not included within Option 3 because of the visual impact of development on the elevated western edge of the town and because the proposed road layout connects sites within the Eastern growth area in such a way as to distribute traffic by reducing pressure at the Convent signals in the most deliverable way.

Crewkerne

Point noted, however the SA objectives are aspirations used to identify the key effects of Core Strategy policies, and cannot address cuts in public spending and International legislation.

Somerton

There is a lack of evidence in the SHLAA that housing sites are available in Option 1, but acknowledge that Options 2 and southern part of Option 3 (northern section has landscape constraints) do perform similarly in the SA. Concerns over flood risk in Option 1 are noted.

Wincanton

It is accepted that access from the northern part of Option 1 to Morrison and or Lidl via cycle may be difficult for some. No concerns were raised by the County Ecologist regarding potential impact on wildlife. It is agreed that the character and settings of Listed Buildings should be protected.

The Strategic Flood Risk Assessment (2008) does not indicate a flood risk in this location and the Environment Agency has not raised concern on this matter. It is considered that the SA correctly identifies that Option 1 is better related to King Arthurs School, the Sports Centre and the Town Centre than Options 2 and 3, although it is accepted that the topography in the northern part of Option 1 as show in the Draft Core Strategy is challenging for some to walk or cycle.

The revised strategic approach means that a direction of growth for employment use only needs to be identified and Option 1 provides the best location in terms of access to the trunk road network, and minimises the impact of goods traffic on the Wincanton road network.

Bruton and Ilchester

In terms of Bruton and Ilchester, the only SA undertaken was as part of Policy SS4, which looks at the distribution of residential growth across the District. As these two settlements are identified as Rural Centres, they do not have a direction of growth afforded to it, and therefore no detailed SA was undertaken for these settlements.

Further SA work required

Sustainability Appraisal is an iterative process, which is carried out alongside production of the Core Strategy. Each policy in the 'Publication' Core Strategy will need to be appraised against the 14 sustainability appraisal objectives to ascertain the likely significant effects of the policies. The Sustainability Appraisal report will be written up consistent with statutory requirements, including the key findings of the Core Strategy policy appraisal and any recommended mitigation measures to improve the sustainability of the policies.

Recommendations

- Write the final Sustainability Appraisal report, reflecting comments on the preferred options report where appropriate; and incorporating the additional SA work on differing proportions of development at Yeovil/rest of District, and

development location options at Langport/Huish Episcopi previously approved at PMB.

- As part of the above, appraise the updated 'publication' plan policies against the 14 SA objectives.
- Present the final SA report for PMB approval with the 'publication' Core Strategy – publish the SA report for consultation alongside the Core Strategy.