

South Somerset District Council: Local Plan 2006 – 2028

Independent Examination, May 2013

South Somerset District Council Hearing Statement

Issue 1

**Basis for the Overall Strategy, including Sustainability Appraisal
and Infrastructure Provision**

April 2013

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Issue 1 Basis for the Overall Strategy, including Sustainability Appraisal and Infrastructure Provision

Question 1.1

Does the Local Plan have regard to national and regional policy (insofar as it is applicable) and if there are any divergencies how is it justified? Are there any implications regarding the forthcoming revocation of the Regional Spatial Strategies? Are there satisfactory linkages with the South Somerset Sustainable Communities strategy and other local strategies and plans?

- 1.1 The Local Plan has been checked against the National Planning Policy Framework when the Proposed Submission Local Plan 2006 -2028 was endorsed for consultation at Full Council meeting on 23rd April 2012. It was also subsequently checked against the Planning Advisory Service checklist and found in broad accord on both occasions.
- 1.2 The South West Regional Spatial Strategy 2006 – 2026 has not been adopted. Secretary of State Proposed Changes were published in July 2008. The current extant Regional Spatial Strategy is RPG 10 covering the period 1996 - 2016. An Environmental report into the revocation of the RPG10 has recently been consulted upon with a view to the revocation of the Regional Planning Guidance and a ministerial statement has now been made in relation to its revocation subject to the laying of a parliamentary order. The Issues and Options Stage of the Local Plan directly addressed emerging Regional Planning Guidance [CD 6]. The Government's intentions to revoke the regional spatial strategy were taken into account in the Draft Core Strategy incorporating preferred options [CD1] and the Council sought to develop its own development targets. These were refined in the Proposed Submission Local Plan where job and housing growth provision was based on more up to date information derived initially from the Consultant's Report on Housing Requirement for South Somerset and Yeovil [CD30] and subsequently developed in the light of changing circumstances and census and population and household projections. This is explained in detail in the Housing Topic Paper [CD14] and referred to in summary in section 4 of the PSSSLP [CD3]. Divergence from extant and emerging RPG is justified on the basis of more current and robust evidence as articulated in the Housing and Employment Topic Papers [CDs 11 and 14]
- 1.3 The Settlement strategy within the Local Plan has originally derived from that within the emerging RSS. This was considered to be based on sound and established planning principles and was developed through consideration of a report on Settlement's Role and Function [CD34] and engagement with Town and Parish Councils and stakeholders and is considered sound. This is explained in section 4 of the PSSSLP [CD 3paras 4.7 – 4.28]

1.4 The Local Plan is soundly based on robust, recent and locally derived information and so the forthcoming revocation has no implications for the Local Plan.

1.5 Para 3.2 of the PSSSLP makes clear that the Sustainable Community Strategy [CD32] is the starting point for the Local Plan to be delivered in spatial terms by the Plan. The Strategic objectives of the local plan (CD3 para 3.4) are derived from those in the Sustainable Community Strategy as is the Vision. The Sustainability Appraisal scoping report identified the objectives of the SCS as key sustainability criteria against which the sustainability of development proposals in the Local Plan be judged. The linkages between the SCS and the Proposed Submission Local Plan are clear robust and in accord with national guidance.

Question 1.2

In general terms is the overall strategy based on a sound assessment of the socio – economic and environmental characteristics of the area and are the impacts of the proposals properly addressed? Would an appropriate balance between providing employment opportunities, new homes and safeguarding the quality of life of existing residents be achieved?

- 2.1 Overall strategy is one of job growth and employment development and matching housing growth set within a settlement hierarchy reflecting settlements' identified economic and service roles and maintaining and enhancing these. It is through this strategy that the strategic objectives of the Plan and the identified Vision will be substantially achieved. The scale of growth is based on an assessment through the Housing Requirement for South Somerset and Yeovil report [CD30] that is based on an in depth assessment of the local District Economy and engagement with local businesses. Social factors and demographics have informed the population and household projections that also feature in determining the appropriate scale of housing growth for the District.
- 2.2 The settlement hierarchy is based on the settlement role and function study [CD34] which presents a detailed assessment of employment, housing needs, retail and community facilities analysis and travel analysis. The Strategic Housing Market Assessment [CD46] provides a detailed household breakdown to inform the wider housing policies.
- 2.3 The Sustainability Appraisal (SA) [CD16] has been used to review the overall scale of growth, and its distribution between the different levels of the settlement hierarchy and alternatives to the levels eventually put forward. The 14 criteria of the SA fully reflect the Sustainable Community Strategy objectives and provide a full checklist of social, economic and environmental factors relevant to the future growth provision for South Somerset. The Sustainability Appraisal's application to the locations of growth for the Yeovil Sustainable Urban Extension, Chard strategic allocation and the directions of growth for the Primary and Local Market towns shows the application of the checklist to the decision process for this level of housing provision. Application of the SA to the area provision of housing development followed the identification of

site/direction options through a constraints mapping exercise that directly addressed local environmental constraints.

- 2.4 The Figure 5 presented in the proposed PSSSLP shows that the Council have been successful in balancing job and home provision through the main levels of the settlement hierarchy. The quality of life of existing residents is addressed in the 14 criteria set out in the SA against which proposed growth in general and in specific locations has been appraised. By promoting economic growth matched by housing provision whilst protecting the best of the environment and focussing on sustainable communities the District Council Strategy is securing the quality of life of existing and future residents.

Question 1.3

Paragraph 154 of the National Planning Policy Framework (NPPF) states that only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan. It is not clear, however, how many of the various development proposals will be taken forward.

For example residential development is proposed in a number of settlements and 'directions of growth' have been identified. However, there is no clear indication of the criteria that the Council would use to determine a planning application in these broad areas and there is no reference to the role that the Site Allocations and Proposals Map Development Plan Document (DPD) may play in providing greater detail in respect of each settlement.

In terms of Yeovil Summerhouse Village there is reference in the supporting text of the local plan to a draft Masterplan but it is not referred to in the Local Development Scheme (e.g. under other Strategies and Documents) and its future status is unclear. I am therefore uncertain as to how the Council would react to a development proposal in that area.

- 3.1 The PSSSLP does not contain clarity about the specific location of development sites in the Yeovil Sustainable Urban Extension direction of growth nor in the directions of growth identified for Market towns and Rural centres. This will be established by the Yeovil Sustainable Urban Extension Masterplan DPD and the Site Allocations and Proposals Map DPD referred to in Modification M73 put forward by the Council in the List of all Modifications to the Proposed Submission South Somerset Local plan 2006 – 2028 [CD 3b] and reflected in the Local Development Scheme 2013 – 2016 [CD27]. These DPDs will establish the specific land to be developed by way of allocation and in the case of the Yeovil Sustainable Urban Extension DPD specific policies for development including policies to achieve a garden suburb. The Council consider that the development management policies within the Local Plan are those that apply to all general development proposals including those to implement identified allocations for the market towns and rural centres.
- 3.2 The Yeovil Summerhouse Village proposal is not referred to in the Council's Local Development Scheme 2013 – 2016. This is because commencement on site is not expected until 2017 – 18 as indicated in the Housing trajectory now presented by the

Council in the List of All Modifications Document [CD3b] and the Local Development Scheme presents higher priority planning work. This position is expanded upon in the Council's answer to question 5.1 including the specific Area Committee resolution identifying the uptake of the masterplanning work for a later date. The recommencement of the masterplan is anticipated after March 2016 and before the anticipated start date on site. Any proposals in the interim will be assessed against the council's emerging Plan upon adoption and the NPPF. The draft masterplan will be a material consideration but of limited weight until concluded.

Question 1.4

Is the local plan based on a sound process of sustainability appraisal and testing of reasonable alternatives, and does it represent the most appropriate strategy in the circumstances? Is the relationship between the scale of the proposed development in the Yeovil area and the scale of development proposed elsewhere in the District justified?

- 4.1 Sustainability Appraisal (SA) has been carried out alongside preparation of the local plan (known as the 'core strategy' at early stages in its preparation process) in order to ensure that the plan delivers sustainable development, as highlighted in the Proposed Submission South Somerset Local Plan [CD3, para 1.17]. The SA report [CD16] documents the process and testing of reasonable alternatives, and explains how the local plan represents the most appropriate strategy in the circumstances.
- 4.2 The SA report [CD16a, chapter 3] explains the methodology used for carrying out the appraisal, consistent with Government guidance¹. Developing reasonable alternatives and assessing the likely significant effects of the plan, consistent with the sound process of undertaking SA, has occurred alongside plan preparation and documented for the 'Core Strategy Issues and Options,' [CD2] 'Draft Core Strategy (incorporating preferred options)' [CD1] and the 'Proposed Submission Local Plan' [CD3].
- 4.3 'Reasonable alternatives' are explained in the SA report as being a different way of fulfilling the objectives of the plan, which should be realistic, and fall within the legal and geographic competence of the authority [CD16a, para 3.3.1]. An outline of the reasons for selecting the options is given [CD16a, section 5.2], summarising the parameters of national and regional policy, geographic scope and time horizon, and the vision and objectives of the plan. More specific reasons are given for choosing the 'reasonable alternatives' where options are discussed e.g. the derivation of district-wide growth options [CD16a, para 5.3.2 – 5], and the 'directions of growth' at the Market Towns [CD16a, para 5.4.19 – 30].
- 4.4 The local plan does represent the most appropriate strategy in the circumstances. A range of district-wide growth options have been considered as reasonable alternatives in preparing the plan, and subject to SA. At the issues and options stage [CD2], options for district-wide housing growth of between 13,600 dwellings and 19,700 dwellings (and in excess of this) were considered (for a plan period of 2006-26, two

¹ A Practical Guide to the Strategic Environmental Assessment Directive, ODPM, 2005.

years shorter than the Proposed Submission Local Plan). A figure in the middle of this range (16,600 dwellings) was taken forward to the preferred options [CD1], and further options were considered in response to consultation comments and updated evidence in developing the PSLP [CD3], ranging from 9,800 dwellings to 17,300 dwellings. The SA report [CD16a] highlights that the upper end of the range is preferred because it:

- More closely reflects the Council's economic aspirations to encourage economic growth, and the national Government's priority to support economic growth;
- Maximises economic growth potential and avoids potential growth inhibition due to a lack of workforce;
- Minimises increased congestion and in-commuting;
- Maximises opportunities for affordable housing and Community Infrastructure Levy returns;
- Minimised upward pressure on house prices (other things being equal).

4.5 Various options were also considered for the distribution of development across the district, from concentrating at Yeovil and the Market Towns, to a dispersed approach of more development at the smaller settlements [CD16a, para 5.3.7 – 9 and 5.4.5 – 14]. A more 'balanced' strategy was the considered most appropriate as it would ensure development is directed to those settlements where people, jobs, and community facilities/services are concentrated, and housing need is greatest, reducing the need to travel and promoting sustainable travel. This would also mean that the negative environmental effects on the rural character of the district would be more limited. This is outlined in the local plan [CD3, para 4.84].

4.6 In addition, the strategy is economic led, which balances the distribution of jobs and homes to ensure more sustainable and self-contained communities [CD14, chapter 6; CD3a, para 4.101 and figure 5].

4.7 The council consider that the relationship between the scale of proposed development in the Yeovil area and elsewhere in the District is justified. Several options were considered in preparing the plan, from just 25% of growth at Yeovil and 75% elsewhere in the District, to a greater concentration at Yeovil (75%) to elsewhere (25%). The SA report explains that the approximate 50:50 split of development at Yeovil compared to elsewhere has the most economic benefits by supporting Yeovil as the prime economic driver, matching future development with existing jobs proportion, enables good accessibility to services and facilities, and helps meet housing need where it is greatest. This scale of development should also ensure the character of the wider rural areas should not be too adversely affected [CD16a, para 5.3.2 – 4 and 5.5.2 – 7]. This justification is also outlined in the plan [CD3, para 4.82 – 83].

Question 1.5

Sustainability Appraisal Objective 12 includes reference to minimising the loss of best and most versatile agricultural land. This accords with the advice in paragraph 112 of the NPPF which states that local planning authorities should

seek to use areas of poorer quality land in preference to that of a higher quality. Has this advice been followed by the Council?

- 5.1 The Council has sought to use areas of poorer quality agricultural land in preference to that of a higher quality, but it has been necessary to balance this advice with other, sometimes competing, issues in order to deliver sustainable development. The key sustainability issues are set out in the SA report [CD16].
- 5.2 In order to meet the development needs of the District, housing and employment development is required on greenfield sites on the edge of the main settlements, leading to an inevitable loss of agricultural land. In considering potential locations for this growth, the advice to use poorer quality agricultural land was an important consideration, but other issues are also relevant such as the landscape impact, historic environment, access to services and facilities, flood risk and biodiversity.
- 5.3 For example, much of Ansford/Castle Cary is surrounded by higher quality agricultural land, making it difficult to avoid in meeting the development needs of the town [CD16a, para 5.4.30]. At Yeovil, best and most versatile agricultural land encompasses the town [CD135a – g], making it impossible to both meet development needs and use areas of poorer quality land. Therefore, it was necessary to prioritise constraints in order to deliver development on the edge of Yeovil [CD3, para 5.26 – 5.32; CD16a 5.4.15 – 5.4.18, 5.5.10 – 5.5.13, and 6.3.2; CD16c, Appendix 5; CD115, PMB workshops 3 and 4].
- 5.4 The approach outlined above is consistent with the presumption in favour of sustainable development set out in the NPPF, para 14.

Question 1.6

Has an assessment been undertaken on the viability of the development sites being taken forward from previous allocations. Can they be delivered?

- 6.1 There have been no recent specific viability assessments of development sites taken forward from previous allocations. The Council have however undertaken general viability assessment as part of its progress towards introducing a Community Infrastructure Levy. This is set out in the Core Document Community Infrastructure Levy Evidence Base [CD 35]. This shows a range of generic housing developments to be viable (excluding large scale 1,000 dw plus urban extension developments) and large scale retail but there are question marks over the viability of other forms of development such as smaller retail, office, general industrial, care homes budget hotels et al.
- 6.2 Most of the sites taken forward now have planning consent or are the subject of planning applications. Of the strategic sites identified in Local Plan policies EP1 and HG1 the Crewkerne key site (with both housing and employment aspects) received consent in February of this year. Land west of Horlicks Ltd (ME /ILMI/3) is now partly developed with a Highways Agency maintenance depot. Land off Station Rd, Ilminster (ME/ILMI/4) is the subject of a planning application for a mixed use employment development awaiting signature of a section 106 agreement. Land adjacent to Powrmatic, Hort Bridge Ilminster (ME/ILMI/5) remains unconsented.

- 6.3 There are 5 housing allocations forming part of the Proposed Submission Local Plan by virtue of being identified as part of the existing commitments in Policy SS5. Of these Wheathill Lane, Milborne Port (HG/MIPO/1) and land north of Newtown Park, Langport (HG/HUEP/1) now have planning permission. Land North of Bancombe Rd Somerton (HG/SOME/1) has a resolution to grant planning permission subject to conclusion of a section 106 agreement and Land west of Remalard Court, Castle Cary (HG/CACA/2) and Home Farm, West End, Somerton (HG/SOME/3) have current planning applications pending consideration for residential development.
- 6.4 There are employment allocations beyond those identified as strategic referred to above that have been identified as part of the existing employment commitments of policy SS3 and these are listed below
- ME/WINC/3 (Land between Lawrence Hill and A303)
 - ME/CACA/3(i) (Torbay Road)
 - ME/MART/2 (West of Ringwell Hill)
 - ME/LOPE/1 (Lopen Head Nursery)
 - ME/CREW/4 (Land North of Fire Station, Backnell Lane)
- 6.5 The ME/LOPE/1 (Lopen Head Nursery) site has various permissions existing on the site for employment land, some of which have been completed and are currently under construction. Only a small part of ME/CACA/3(i) (Torbay Rd) remains undeveloped and proposal ME/MART/2 (West of Ringwell Hill) has a resolution to grant planning permission for employment development (planning application 05/00887/OUT).
- 6.6 ME/WINC/3 (Land between Lawrence Hill; and A 303) was reviewed through the Employment Land review and considered to be deliverable.
- 6.7 In the light of the planning history on sites taken forward from previous allocations it is considered that these sites can be delivered. This is backed up in the case of housing sites by the general viability work undertaken as part of progress towards a Community Levy in South Somerset.

Question 1.7

What is the justification for some development being proposed for beyond the plan period?

- 7.1 Development beyond the plan period is proposed in policy YV1 and PMT 1 and 2 and reflected in policies SS3 and SS5. In Yeovil the post plan provision is for 935 dw and 3 ha of employment land in the Yeovil Sustainable Urban Extension and for Chard it is 1,340 dwellings and 6 ha of employment land.
- 7.2 The justification for development beyond the plan period for the Yeovil Sustainable Urban Extension relates to the Council's view that a minimum of 2,500 dw is required as a minimum size for a sustainable community to be developed. The genesis of this is set out in the Housing Topic Paper [CD14] The arguments are presented in the papers considered by Project Management Board at its Workshop 3 and again at Workshop 13 following request by Area South Committee to review the scale of the urban extension. In essence the view was that a sustainable community required a minimum provision of 2,500. Given the evidence presented in the Housing Trajectory as modified by the Council in Modification M76 in the List of all Modifications [CD3b] of a start on site in 2017/18 with 150 dw pa once the site's construction was

established this implied 935 dw would be required to be constructed to deliver the sustainable community post plan. The 3 ha employment provision post plan represents a pro rata delivery rate for employment land take up.

- 7.3 The post plan provision for development at Chard reflects the outcome of the Chard Regeneration Strategy which provided a scale of growth for Chard that will enable it to achieve and maximise its needs for employment, retail and associated amenities as well as improved highway provision. The Council has addressed this matter directly in their Modification M103 in the List of all Modifications [CD3b] which makes clear that

“The strategic growth for Chard will be delivered within and beyond the plan period as part of a cohesive plan to regenerate the town and achieve build out. The number of homes expected to come forward within the plan period reflects market deliverability”

- 7.4 The housing trajectory as modified in M75 in the List of all Modifications [CD3b] indicates that the projection resulting in 1852 dw within the Plan to be based on completions, commitments and then expected market delivery derived from the Lister Report [CD 112].

Question 1.8

Has the relationship between the District and neighbouring local towns, for example between Yeovil and Sherborne, been properly addressed through the Duty to Co-operate?

- 8.1 The Duty to Co-operate Report [CD] sets out the engagement with West Dorset District Council on strategic planning matters and the emerging South Somerset Local Plan. West Dorset District Council has responded to consultation on the Local Plan at Draft Core Strategy and Proposed Submission stages.

Question 1.9

What are the implications for the proposed level of growth on the existing infrastructure? Has the provision of new infrastructure required to accommodate the proposed growth been properly assessed?

- 9.1 The implications of proposed growth on existing infrastructure is presented in depth within the Report on Infrastructure Planning in South Somerset published in January 2012 [CD36]. This report sets out the infrastructure required for development and broadly when and identifies known funding and responsibilities for funding. It also addresses gaps in funding and how they might be addressed.
- 9.2 Specifically, the infrastructure planning report sought to:
- Identify the nature of infrastructure (physical, community or green) and present the requirements by settlement
 - Highlight infrastructure capacity issues and existing capacity where possible, through the review of existing information and consultation with stakeholders.
 - Identify the infrastructure impacts of additional development in generic and specific terms for main settlements and on a district basis.

- Illustrate the net infrastructure impact of new development and highlight significant issues.
 - Provide information on the indicative cost of infrastructure.
 - Identify public funding mechanisms and responsibility for delivery.
 - consider how the infrastructure might be prioritised
- 9.3 The Infrastructure Planning Report provides a focus for long term strategic financial decisions that will inevitably need to be refined and realigned as the process and time unfolds. The Infrastructure Report sets out a broad framework for infrastructure delivery to 2028 but with more detail for the early part of the plan. It reflects a “snapshot in time” of infrastructure requirements and these will be constantly changing to reflect funding arrangements and also changes in growth and priorities. Therefore this Infrastructure Plan must be seen as a living document subject to constant change. The Council have commenced the updating process for the infrastructure Report and the database of infrastructure information that underpins it. A call for information from Infrastructure providers is shortly to be made and the funding provision from section 106 moneys and government funding is also being updated. This information will serve to inform policy implementation and decision making in the future along with the general viability of development and its ability to fund more or less infrastructure either directly through section 106 or indirectly through CIL as time unfolds and the economy moves from recession to recovery and vice versa.
- 9.4 The Infrastructure Report was augmented by a number of other specific Infrastructure reports that are set out in the evidence base. These included:-
- Yeovil traffic Modelling Report [CD95]
 - Yeovil traffic Modelling Addendum Report [CD97]
 - Yeovil traffic Modelling Addendum Report II [CD98]
 - Yeovil Infrastructure Impact Assessment [CD 106]
 - Chard Regeneration Framework phased cost plan [CD110b]
 - Proposed Residential Development, Shudrick lane, Ilminster Assessment of Highway Capacity [CD114]
- 9.5 The Infrastructure Report fed into the reports on scale of development considered by Project Management Board at Workshop 11 [CD116] where the scale of growth appropriate for the settlements within the District was reviewed in the light of the findings of the Infrastructure Report and found to be sound. The findings were subsequently incorporated in more detail into the revised Proposed Submission Local Plan.
- 9.6 The Infrastructure Planning Report was produced in January 2012 and in consequence the amount of expected growth for the District (housing and employment) was higher than that proposed in the PSSSLP. Less growth now proposed should in general impose less infrastructure pressures and therefore the Infrastructure Report’s conclusions remain applicable. Similarly the changes in the occurrence of the housing growth presented by the Housing Trajectory set out by the Council in Proposed Change No M75 in the List of all Modifications [CD3b] against that set out in the Infrastructure report are not significant enough in scale to cause review of the report’s findings.

Question 1.10

Have any implications of the overall strategy on the Dorset Area of Outstanding Natural Beauty been identified and addressed?

- 10.1 The Dorset Area of Outstanding Natural Beauty (DAOB) abuts the South Somerset border from the border to the south of Yeovil to the south of Chard apart from a small section in the vicinity of Winsham and Clapton. The NPPF indicates in para 115 that
- “Great weight should be given to conserving landscape and scenic beauty in national parks, the Broads and Areas of Outstanding National Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas and should be given great in national parks and the broads”
- 10.2 The South Somerset Strategy could possibly impact on the DOAB by promoting significant growth in areas close to and visible from the DOAB. This principally means Yeovil, Crewkerne and Chard where significant growth is proposed amounting in total to 10,704 dwellings within the Plan period or two thirds of total housing growth with an aspiration to provide up to 32 ha of additional employment land for development if required and to provide choice to potential employers. Each of these settlements whilst relatively near to the DOAB are not in its immediate vicinity. Each has been subject to peripheral landscape studies [CD68o-u, c and d] that have sought to take long distance views into account. In each case the identified visual sensitivity envelopes around the towns did not extend into the DOAB which accordingly will not be adversely affected by prospective development. In the case of Chard and Crewkerne the identified growth areas substantially reflect existing Local Plan allocations.
- 10.3 The Dorset AONB Partnership and West Dorset District Council and Dorset County Council have all been consulted on the Proposed Submission Local plan and have not raised any concerns in relation to impact on the DOAB.
- 10.4 The Bracket’s Coppice Special Area of Conservation lies within then DOAB near Halstock and is some 7km to the centre of Crewkerne and 8km to the centre of Yeovil. Due to its status Habitat Regulation Assessments were undertaken at the draft Core Strategy Stage [CD65] following a screening report [CD64] and subsequently at the Proposed Submission South Somerset Local Plan stage [CD 8a and b] as a consequence of which some policies of South Somerset Local plan were amended. The potential impact of the Local Plan and the strategy articulated within it has been fully assessed as required and following mitigation of policy the Proposed Submission Local Plan does not adversely impact on the Bracket’s Coppice Special Area of Conservation.
- 10.5 In conclusion the potential implications of the overall strategy on the Dorset Area of Outstanding Natural Beauty have been identified and satisfactorily addressed.