

**South Somerset District Council: Local Plan 2006 – 2028**

**Independent Examination, May 2013**

**South Somerset District Council Hearing Statement**

**Issue 7**

**Chard**

**April 2013**

## **Issue 7: Chard**

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## Issue 7: Chard

### Question 7.1

**Is the vision for growth and change in this area appropriate and justified, including in relation to national guidance and local needs, and in terms of economic, social and environmental impact?**

#### Vision for growth

- 1.1 Due to its strong employment, retail and community role Chard is identified as a Market Town in the South Somerset Settlement Role and Function Study Final Report 2009 [CD 34, para 6.20]. Chard is the second largest settlement in the District with a population of 12,703<sup>1</sup> closely followed by Crewkerne with a population of 7,406<sup>2</sup>; Yeovil is significantly larger with a population of 43,959<sup>3</sup> people. Chard is identified as Primary Market Town in Proposed Submission South Somerset Local Plan (2012) (PSSSLP) Policy SS1: Settlement Strategy [CD 3, para 4.29].
- 1.2 PSSSLP Policy SS5: Delivering New Housing Growth provides for 1,852 dwellings within the plan period 2006-2028, 1750<sup>4</sup> are committed and an additional 102 are required [CD 3b, M74]. Given the lack of available land in the urban area this growth is identified on greenfield land. Policy SS3: Delivering New Employment Land provides for 17.14 ha of employment land within the plan period (6 additional hectares will be delivered post 2028 [CD 3b, M34]. In terms of the distribution of growth the approach across the district has been to balance jobs and housing growth, with an underlying view that similarity between a settlement's job growth and housing growth share should assist self-containment and support local job provision [CD 14, para 6.9].
- 1.3 PSSSLP Policies PMT1: Chard Strategic Growth Area and PMT2: Chard Phasing [CD 3 paras 6.24 and 6.49, CD 3b, M105 and M109] identify a strategic growth allocation for Chard consisting of approximately 2716 dwellings, approximately 19 ha of employment land, 2 new primary schools, four neighbourhood centres, highway infrastructure improvements, sports and open space provision to be delivered within and beyond the plan period.
- 1.4 PSSSLP policies SS1, SS3 and SS5 have all been subject to Sustainability Appraisal (SA); given that the settlement hierarchy policy has directly informed Policy SS5, Policies SS1 and SS5 are appraised together. The balanced approach to the distribution of development has many advantages over a more dispersed approach by ensuring better access to jobs, shops, and facilities and services. This should help reduce the need to travel in the district. The focus on Yeovil, Market Towns and Rural Centres will allow housing need in the larger settlements to be met, whilst limiting new housing in rural settlements where there is generally poor access to jobs, services etc. The landscape and townscape of rural settlements should be better protected than with a more dispersed approach [CD 16c, Appendix 7 p.1-4].

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<sup>1</sup> ONS Mid Year estimates 2010 – Urban Area

<sup>2</sup> ONS Mid Year estimates 2010 – Urban Area

<sup>3</sup> ONS Mid Year estimates 2010 – Urban Area

<sup>4</sup> 1,750 commitments at Chard reflects built and committed sites and that part of the strategic allocation proposed for Chard that is expected to be built out in the plan period. This latter is shown as committed as it is currently part of the saved proposal from South Somerset Local Plan 1991 – 2011. The additional provision is windfall development prior to April 2017 not currently consented (April 2012). The strategic allocation provides for 2,716 dwellings of which 1,220 are anticipated in the Plan period with the rest, 1,496 expected post 2028.

- 1.5 Sustainability appraisal of Policies PMT1 and PMT2 was also undertaken [CD 16c, p.35-38] and this identifies that many positive impacts will arise as a result of the proposal such as improved highway access, improvements to the physical, social and economic environment of the Town Centre. The Options for the growth of Chard also underwent sustainability appraisal, this is discussed further in response to Question 7.2.

### **Chard Regeneration Scheme**

- 1.6 There have been many initiatives over the years to promote the regeneration of Chard. Despite some successes, development across the town has been criticised as being piecemeal and reactionary rather than being part of a strategic and planned approach, and has led to the significant loss of employment land to residential use.
- 1.7 The Chard Regeneration Scheme (CRS) is the result of many detailed discussions over a number of years about the challenges that face Chard, including delivery of Chard Key Site (adopted South Somerset Local Plan 1991-2011 (2006) Policy KS/CHAR/1) [CD 134] and in particular addressing issues relating to the delivery of the distributor road and the impact of piecemeal development, as well as identifying regeneration opportunities that could be available. In January 2007 the District Council agreed the need to lead the development of a Chard Vision project that would allow the challenges to be met and the regeneration opportunities to be taken. Extensive negotiations with the South West Regional Development Agency (SWRDA), Somerset County Council (SCC) and Chard Town Council (CTC) were concluded in October 2008. These established the CRS.
- 1.8 The plans to transform and regenerate the town of Chard moved forward in early 2009, when it was announced that South Somerset District Council, the South West RDA (now HCA), Somerset County Council and Chard Town Council had formed a regeneration partnership and appointed LDA Design - a leading masterplanning consultancy – to build on previous initiatives and known development opportunities; to prepare a long term vision and place-making plans for the town to prioritise investments and improvements to deliver the comprehensive physical regeneration and redevelopment that Chard needs.
- 1.9 The Chard Regeneration Scheme (CRS) which includes the four documents that make up the Chard Regeneration Framework i.e. A Vision for Chard (September 2010), The Chard Regeneration Plan (September 2010) [CD 111], The Chard Implementation Plan (October, 2010) [CD 110] and the Strategic Transport Appraisal Report (August, 2010) [CD 113b] is an example of good practice, pooling the efforts of South Somerset District Council, Somerset County Council and Chard Town Council to produce a framework for growth, involving and identifying the needs of the public, appropriate key stakeholders, landowners and the local planning & transport authority. This has allowed all parties to contribute to the development of ideas and enable a rounded understanding of the issues from the earliest stages. In recognition of its sustainable community development approach, the CRS was commended in the final of the RTPI Regeneration Planning Awards 2010.
- 1.10 To make sure the local community was involved in developing the Vision for the town, a Community Forum and Town Team were created made up from community groups and organisations, employers, retailers, local Councillors and businesses within the town. This was to ensure the community and other interested parties had an opportunity to shape how the town develops in the future. These groups were invited to a series of workshops to help develop a set of Regeneration Aims and Objectives

for the town and set out a number of Priority Projects that regeneration should be focused towards (e.g. Town Centre regeneration). These groups played a vital role in the formation of the Regeneration Framework throughout its development and continue to support the Scheme in its current delivery phase. On 18 November 2009 Area West Committee gave in principle approval of the Chard Regeneration Plan. The PSSSLP [CD 3, para 6.18] sets out the 3 key aims underlying the vision for Chard, this includes building on the tradition of innovation and manufacturing, making the community more self-sufficient and developing and enhancing the urban and natural environment.

1.11 Project managed by both Economic Development and Development Control within SSDC and supported by the Area West Team and Spatial Policy, collaborative exercises and consultations continue to build community support for the Scheme as phased growth is implemented. The Town Team and Community Forum remain key groups for effective engagement in the delivery of the phased plan, bringing on board appropriate representatives from community groups, transport user groups and providers, local businesses, developers and landowners as required.

1.12 For clarity a summary of the timeline of the Chard proposals is set out below.

**Table 1: Timeline Summary**

Date	Milestone
April 2006	South Somerset Local Plan 2006–2011 adopted – includes Proposal KS/CHAR/1: Land East of Chard, between Furnham Road and Tatworth Road (Chard key Site) [CD 134]
2007	Chard Vision Project established
2008	Chard Regeneration Scheme established
2009-2010	<p><b>Stage 1:</b> Creating the Vision (completed in May 2009)</p> <p><b>Stage 2:</b> Review of existing documents and baseline analysis (2009)</p> <p><b>Stage 3:</b> Production of key documents (2009-2010)</p> <ul style="list-style-type: none"> <li>· Conservation Area Appraisal and Boundary Review</li> <li>· Urban Development Framework (including listed building and conservation implications)</li> <li>· Land Uses, Infrastructure and Sustainable Development</li> <li>· Urban Design Codes</li> <li>· Transport Assessment and Strategy</li> <li>· Viability Appraisal</li> <li>· Chard Town Centre Masterplan</li> <li>· Chard Town Centre Regeneration Site (MU/CHAR/04) Development Brief</li> <li>· Chard Key Site Masterplan</li> <li>· Public Participation/Consultation</li> <li>· Sustainability Appraisal and Options</li> </ul> <p><b>Stage 4:</b> Implementation Plan (2010) [CD 110]</p> <p>18 November 2009 Area West Committee approves the Chard Regeneration Plan in principle.</p>
September 2010 and August 2010	Publication of Chard Regeneration Plan (LDA Design), Implementation Plan and Strategic Transport Assessment (PBA) [CDs 111, 110, 113]
October 2010	Publication of the Draft Core Strategy (incorporating Preferred Options) - including Policies CV1: Chard Growth Area, CV2: Chard Phasing, and CV3: Chard Obligations (Option 3 of Chard Regeneration Scheme)

	identified as the Preferred Option) [CD 1]
February 2012	Publication of Feasibility Report in respect of Chard Eastern Development Area (Thomas Lister Ltd) [CD 112]
March 2012 and April 2012	Area West Committee and Full Council agree that Policies CV1 and CV2 (later renamed PMT1 and PMT2) be taken forward in the Proposed Submission Local Plan 2006-2028 [CD 3]
June 2012	Publication of proposed Submission South Somerset Local Plan 2006 – 2028 - including Policy PMT1: Chard Strategic Growth Area and Policy PMT2: Chard Phasing [CD 3, paras 6.24 and 6.49, CD 3b, M105 and M109]

## Sustainable development

- 1.13 Greg Clark's ministerial introduction to the National Planning Policy Framework (CLG, 2012) (NPPF) emphasises that planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives and that from now on the planning process should include rather exclude local people and communities. Paragraph 1 of the NPPF states that the NPPF provides a framework in which local people and their Council can produce their own distinctive plans which local needs and priorities. It is considered that the production of the documents that make up the Chard Regeneration Framework which form the basis of PSSSLP Policies PMT1: Chard Strategic Growth Area and PMT2: Chard Phasing [CD 3, paras 6.24 and 6.49, CD 3b, M105 and M109] are consistent with this key objective of the NPPF and particularly address the Core Planning principles set out in paragraph 17 of the NPPF. The NPPF is supportive of and promotes such mixed use development in order to promote self-containment [NPPF, paras 17, 37 and 38].
- 1.14 With regard to the provision of sustainable development as explained in paragraphs 7-16 of the NPPF; PSSSLP Policies PMT1 and PMT2 [CD 3, paras 6.24 and 6.49, CD 3b, M105 and M109] address the three dimensions of sustainable development. In accordance with paragraphs 18 to 22 of the NPPF the proposals promote the economic growth of Chard. This is addressed by the provision of regeneration opportunities in the Town Centre and new employment development (approximately 19 ha overall with approximately 13 ha within the plan period). Efforts are being made and will continue to be put into retaining existing local businesses and building on the existing manufacturing and food-processing base. The Chard Regeneration Plan (2010) [CD 111] recognises the importance of building upon this base, the regeneration of the Town Centre is likely to create jobs in retail, offices and leisure. Local Plan development management policies in the Economic Prosperity section support this. New employers are likely to be drawn to the town if there is a willing and able local work force although the market is currently slow conditions would be expected to improve over the plan period.
- 1.15 The regeneration proposals together with offering a choice of high quality homes<sup>5</sup> in accordance with paragraph 47 of the NPPF (2716 dwellings, approximately 1220 within the plan period and approximately 1496 beyond), education, community and sports and open space provision (including a relocated football club) and improvements to the highway network will, in accordance with paragraph 70 of the NPPF, fulfil a social role and contribute towards a strong and healthy community with

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<sup>5</sup> Including affordable housing

access to the facilities to support its needs of the NPPF [CD 3, paras 6.24 and 6.49, CD 3b, M105 and M109].

- 1.16 The Strategic allocation is located in an area where its impact on the natural environment will be minimised in terms of landscape with the indicative link road skirting around the western side of Chard Reservoir in a location already accepted by the Inspector in his report to the District Council following consideration of objections to the South Somerset Local Plan 1991-2011 [CD 134]. Paragraph 6.24 of the PSSSLP [CD 3] identifies the presence of dormice and potential significant impacts on the local bat population in some areas of the strategic growth allocation. This will need to be taken into account and mitigation measures put in place. Compensatory off site habitat creation may be required. In accordance with paragraph 113 of the NPPF PSSSLP Policy EQ2: General Development seeks to ensure that the integrity of internationally, nationally or locally designated wildlife and landscape sites is not put at risk by proposals [CD 3, paragraph 12.33].
- 1.17 The strategic growth proposals for Chard are based on a robust process of community engagement and masterplanning expertise and there has been wide ranging community input into the process. Through the Chard Regeneration Framework (CRF) sets out a phased approach to the delivery of sustainable growth in Chard that addresses the key issue of highway capacity at the central junction (Convent Link). Policy PMT2: Chard Phasing [CD 3b M109, CD 3a para 6.49] makes direct reference to the delivery of the growth in phases in accordance with the Chard Implementation Plan (2010) [CD 110] but does allow the flexibility to deviate from that phasing sequence if it can be demonstrated that the proposal will not compromise the delivery of the proposal as a whole.
- 1.18 The proposals for Chard are considered to be appropriate and justified, including in relation to national guidance and local needs, and in terms of economic, social and environmental impact.

## **Question 7.2**

### **Has each of the proposed development sites been subject to sustainability appraisal? Have all reasonable alternatives been adequately assessed?**

- 2.1 Sustainability appraisal of the Chard growth proposals was carried out by LDA consultants using the 14 sustainability objectives set out in the South Somerset Sustainability Appraisal Framework [CD 16c, Appendix 6A, p.1-12]. Each of the 4 Growth Options for Chard identified in Figures 8 to 11 of the Draft Core Strategy (incorporating Preferred Options) (2010) [CD 1] were appraised.
- 2.2 Section 2 of the Chard Regeneration Plan (2010) [CD 111] sets out the masterplanning process used to identify the 4 potential growth options this includes examining the potential for change (section 2), regulatory, market and infrastructure influences (section 3), the framework for change (section 4) leading to illustrative masterplans (section 5), design codes (section 6) and finally development options and phasing (section 7). The development Options present discrete packages that lead to logical stages at which development in the town can conclude or pause before resuming again.
- 2.3 As explained in the PSSSLP [CD 3, paras 6.38-6.42] the existing highway infrastructure and connectivity issues were key drivers to unlocking the regeneration

and growth opportunities in order to ensure viability and deliverability. Each parcel of land in each phase has been designed to release the necessary highway capacity to unlock the development of the next plot. Each growth option builds on from the next and presents a package of development / regeneration; it would therefore not have been appropriate to carry out a sustainability appraisal of each individual parcel of land as the strategic growth depends on the grouping of those individual plots to deliver the strategic growth in Chard whilst ensuring that capacity within the highway network is maintained. The detailed phasing is set out in the Chard Regeneration Framework: Implementation Plan (LDA Design, 2010) [CD 110].

- 2.4 Paragraphs 6.38 to 6.48 of the PSSSLP [CD 3] discuss the implementation of the proposal. A key driver of the phasing sequence is the need to incrementally increase the capacity of the highway infrastructure to accommodate traffic as the town grows. Whilst some improvements have been made to the traffic lights at the Covent Link (by the installation of signal control software) this improvement should be followed by a phased delivery of a continuous route to the east of the town from the A358 Furnham Road to the A358 Tatworth Road with appropriate connections to adjacent urban areas. As a first step towards the implementation of the wider plan the Millfield Link Road between the A30 and the Millfield Industrial Estate should come forward as it will help create capacity for initial growth. The key to delivery is seen to be the commencement of Phase 2 of the allocation (which includes the Millfield Link) hence the appointment of Thomas Lister Ltd (explained in response to Question 7.4 below).
- 2.5 Given the over-arching aims of the Chard Vision and the constraints imposed by the highway infrastructure in Chard it is considered that all reasonable alternatives have been considered.

### **Question 7.3**

#### **What is the status of the Chard Regeneration Framework and is it adequately reflected in the local plan?**

- 3.1 The background to the Chard Regeneration Framework has been explained in the responses to questions 7.1 and 7.2 above. Whilst the documents do not have any formal planning status at this time they have been subject to extensive community engagement and discussion. Additionally there has been the opportunity for formal representations to be made through the Local Plan process.
- 3.2 The PSSSLP [CD 3, para 6.38] makes clear reference to the Chard Regeneration Framework [CDs 110,111, & 113] and Policy PMT2 [CD 3, para 6.49] states that the development phases of the strategic allocation should be delivered in the order set out in the Chard Implementation Plan (2010) [CD 110]; this has the effect of enshrining the Chard Regeneration Framework in Local Plan Policy.
- 3.3 It was always the Council's intention to give the Framework its statutory status through the local plan process. It was made clear at PMB on 17 June 2009 that the strategic elements of the Chard work would be fed into the emerging plan. Paragraph 6.32 of the draft Local Plan [CD 1] also explains this point. It is considered that the status of the Chard Regeneration Framework is adequately reflected in the PSSSLP [CD 3, paras 6.16 to 6.49].

## Question 7.4

### Can each of the proposed development sites be satisfactorily delivered?

- 4.1 The response to this Question will be set out in a Statement of Common Ground between South Somerset District Council and The Chard Eastern Development Area Consortium, this is currently being drafted and has yet to be presented. However, some additional points of background / clarification are set out below.
- 4.2 Following their appointment by the Chard Project Delivery Group in 2012, Thomas Lister Ltd completed the Feasibility Report in respect of Chard Eastern Development Area (CEDA), (Lister Report) [CD 112]. They have sought to bring forward proposals for Phase 2 of with developers and landowners. PMB considered and endorsed the report in January 2012 [CD 116, Workshop 12, 27 January 2012] where it was explained that market assessment work undertaken as part of this Feasibility Report suggests that residential development in the eastern area of Chard should be viable taking into account both CIL and Section 106 contributions/requirements. This position is supported through appraisal work undertaken as part of the study. The Feasibility Market Assessment assumes that the main element of the infrastructure requirement – the Millfield Link Road– is provided out of the public purse in one form or another and it is the removal of this cost, which then makes the development viable.
- 4.3 Consultation with the majority of those landowners and developers holding an interest in land within CEDA suggested a high level of ‘in principle’ support for the reallocation proposals, use of CIL to deliver infrastructure and confirms delivery to be viable if major infrastructure is provided.
- 4.4 The Lister Report [CD 112] identifies the clearest mechanism by which SSDC might take delivery of the Millfield Link forward would be to acquire the land required to provide the highways infrastructure and ultimately to procure the construction direct. This would potentially require a Compulsory Purchase Order (CPO) to be pursued in order to satisfactorily negotiate all those necessary interests to progress the scheme. It is considered that such an approach would have an overall cost in the order of £3.95 million but potentially offset in part through CIL contributions directly brought about within CEDA of circa. £2.16 million. The remaining deficit might be recovered as part of the District wide CIL mechanism with additional contributions through such schemes as the New Homes Bonus or possibly the Growing Places Fund. It is recognised that it would be important to ensure that there is a financial package in place before the CPO route is pursued.
- 4.5 The key findings of the Feasibility Report [CD 112] are set put in paragraph 6.43 of the PSSLP [CD 3] the Council concluded at District Executive Committee on 26 March 2012 that the Chard Eastern Development Area can be delivered through the mechanism identified in the Feasibility Report [CD 112]; that the use of CPO powers may need to be considered following Examination; that the costs of this are considered as part of the Council’s Medium Term Financial Plan and that negotiations continue with perspective developers of Phase 2 in order to secure private sector development [CD 3, para 6.45, CD 116].
- 4.6 Whilst the District Council is aware of a potential ransom issue associated with the delivery of the Millfield Link it had confirmation in October 2012 that an agreement has been reached by the owner of the land at the western end of Millfield and the option holder/developer of the adjacent development land that removes any constriction or

ransom preventing access between the development site and the Millfield Trading Estate. Email evidence of this is attached as Appendix A7.4A.

- 4.7 More recently planning application 12/04319/OUT for the erection of 78 dwellings, new access and road, Land at Avishayes Road, Oaklands Ave, Chard, has been submitted and seeks to bring forward part of that Phase 1 development as identified in the Chard Regeneration Framework Implementation Plan (2010) [CD 110, Figure 3]. It is anticipated that this application will be going to Area West Committee in April 2013. This demonstrates, together with the Statement of Common Ground between the Council and The Chard Eastern Development Area Consortium that the growth proposals for Chard can be delivered.

## **Question 7.5**

**Have the traffic implications of the proposed development been adequately assessed? How will highway infrastructure improvements be delivered – should policy PMT1 be more specific in this regard?**

### **Strategic Transport Appraisal Report**

- 5.1 The purpose of the Strategic Transport Appraisal Report (Peter Brett Associates, 2010) (STAR) [CD, 113b] was to:
- Assess the capacity of the Chard Transport Network to provide for future development;
  - assess what level of infrastructure provision could be required to allow further development;
  - Once the capacity of the existing network is reached, to work proactively with SSDC in the development of the regeneration framework;
  - consider access and movement in and around Chard by all modes
  - determine the likely impact of the proposed regeneration on the local transport network and identify a suitable package of mitigation measures where required  
[CD 113b, para 1.2.4]
- 5.2 Section 5 of the STAR [CD 113b] explains the assessment methodology that has been undertaken in order to model the predicted transport patterns and traffic flows arising through the implementation of a phased regeneration framework within Chard. The document is supported by a number of technical documents:
- PFA Model Development and Validation report;
  - PBA Baseline report;
  - PBA Technical Note 002 – Public Transport;
  - PBA Memo – Rail Feasibility; and
  - SATURN Outputs.
- 5.3 The conclusions and recommendations of the STAR are set out in section 9 of the document [CD 113b]. Paragraph 9.2.2 identifies that Chard’s existing highway network was found to be “critically dependent” on the functionality of the central Convent Link junction (A30/A258) and that capacity for growth in Chard was limited by this, requiring either improvement to the junction or an alternative route. The STAR Executive Summary [CD 113a, para 1.1.21] identifies that the LDA phasing proposals work for phases 1-9 of the Chard Regeneration Plan (2001) [CD 110] as these would operate adequately during peak times in the 2026 forecast year subject to an area wide travel plan being implemented and appropriate lateral road links associated with these

phases being delivered, however phases 1-10 would not be achievable. This is reflected in the sustainability appraisal of the 4 growth Options which shows that Option 4 would result in significant increases in traffic congestion at several key junctions throughout the town and an additional link around the western side of the town would be difficult to achieve and require additional masterplanning [CD 16c, Appendix 6A, p.1-12].

- 5.4 The STAR [CD 113b] demonstrates that there is only limited capacity in the Convent Link junction. Without properly planned and phased highway infrastructure the capacity for Chard to grow will be limited. Through this assessment work it is considered that the traffic implications of the proposal have been adequately assessed when considering this strategic growth.

#### **How will highway infrastructure improvements be delivered?**

- 5.5 The Chard Regeneration Framework Implementation Plan (2010) [CD 110] sets out a phased approach to growth that delivers the necessary highway infrastructure. As explained above improvements have already been made to the traffic light system at the Convent Link junction. It has also been explained that the costs of this new infrastructure are significant and if a private sector solution cannot be negotiated then the Council will have to consider whether they are willing to use Compulsory Purchase Order powers to facilitate a solution. This was considered by PMB in January 2012 [CD 116, PMB Workshop 12, 27 January 2012] and District Executive Committee in March 2012. The Statement of Common Ground with the Chard Eastern Development Area Consortium will address the delivery of road links in more detail.

#### **Should Policy PMT1 be more specific?**

- 5.6 Highway implementation matters are addressed in Policy PMT2: Chard Phasing [CD 3, para 6.49]. As explained in paragraph 3.2 above Policy PMT2 states that development proposals should be delivered in accordance with the Implementation Plan [CD 110] however the Policy does offer the flexibility to deviate from that phasing sequence as long as delivery of the total growth will not be compromised [CD 3, para 6.49]. Policy PMT1: Chard Strategic Growth Area [CD 3b, M105] refers to "Highway Infrastructure and improvements" and this is considered adequate in the light of the supporting text of the PSSSLP [CD 3, paras 6.40 to 6.48] and Policy PMT2: Chard Phasing [CD 3, para 6.49]. It is not considered that Policy PMT1 should be more specific in this respect [CD 3, para 6.24].

**APPENDIX A7.4A**

**Email exchange regarding land at Millfield, Chard**