

**Examination Suspension Project Management Board – Item 4a
Workshop 30: 25th October 2013**

**Proposed Submission South Somerset Local Plan 2006 - 2028
Examination Suspension Soundness Issue 2**

Direction of Growth for Ilminster

Background Report

1. Introduction

- 1.1 South Somerset District Council (SSDC) has been undertaking Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) since 2009 to inform the preparation of the South Somerset Local Plan. The detailed SA for the Ilminster Direction of Growth that was presented in Appendices 6 and 7 of the Local Plan Sustainability Appraisal Report of June 2012 underpins the Council's decision on which of three proposed directions of growth for the town it prefers and proposes adopting. The Inspector undertaking the current Examination into the Proposed Submission South Somerset Local Plan 2006 – 2028 has, in his Preliminary Findings Letter of 3rd July 2013, indicated that “the proposed direction of growth at Ilminster appears not to be sound”. He refers to errors in the Sustainability Appraisal for the town and indicates that he considers the Canal Way (South West) Option to be the most sustainable and that Shudrick Valley (South East) Option is not justified when considered against Canal Way.
- 1.2 As a result of the Inspector's comments and representations made by stakeholders during the Examination process the Council have decided to review and revise as appropriate the SA of the Options for the Direction of Growth for Ilminster and to present the resulting Proposed Main Modification in the light of the results. This report sets out:
- how the Options for the Direction of Growth were considered through the plan process and in particular through the Sustainability Appraisal;
 - explains the method by which the revised SA was undertaken (which is fundamentally the same method as set out in the Local Plan Sustainability Appraisal Report of June 2012);
 - provides a brief summary of the representations and the new evidence that have informed a change in the sustainability appraisal; and
 - presents a revised appraisal for the three Options for the Direction of Growth for Ilminster.
 - Concludes on the implications of the sustainability appraisal
- 1.3 At the end of this Report following the SA a further section reviews the wider planning arguments, many of which are expressed within the SA, and presents a reasoned case for the preferred location for the Direction of Growth. This preference is then presented in a Proposed Main Modification with consequent amendments to the Plan and these are put forward for approval for consultation. This consists of a summary of the justification for change, issues considered and changes to policy, supporting text and proposals map of the Proposed Submission South Somerset Local Plan 2006 - 2028. The proposed Main Modification is also set out in the Examination Suspension - Proposed Main Modifications Consultation Document.

**Examination Suspension Project Management Board – Item 4a
Workshop 30: 25th October 2013**

- 1.4 The proposed Main Modification requires the existing Habitat Regulation Assessment and Equality Analysis to be reviewed to ensure that it does not adversely impact internationally designated conservation sites and in its formulation the Council has had due regard to its potential impact on the General Equality duty of the Council (i.e. the Council has had due regard to eliminate discrimination, harassment and victimisation, equality of opportunity and the fostering of good relations in producing its Main Modification for Ilminster). This has been done and is set out in the sections below immediately post the Main Modification.

2. Consideration of Direction of Growth Options through the Plan process

Draft Core Strategy

- 2.1 Three options were identified for consideration for the Direction for Growth for Ilminster in the Draft Core Strategy of October 2010 and were subject to appraisal through the SA. These were Option 1 South East (also known as Shudrick Valley or Lane); Option 2 South West (also known as Canal Way) and Option 3 (North). These options emerged from a constraints assessment of land around the town with particular emphasis on flood risk issues and landscape.

- 2.2 The findings of the SA of Ilminster Options are set out in Appendix 6A of the Local Plan Sustainability Appraisal Report June 2012 (pages 21-27). The overall conclusion expressed on page 27 of Appendix 6A was that Option 2 the South West (Canal Way) was the preferred option and was identified as such in the Draft Core Strategy. The main reasons given were that

“Whilst all 3 options score well in terms of providing housing development to meet the needs of the existing and future population of Ilminster, Option 2 produces the most positive effects overall as it is well related to schools, shops and health facilities and would be most likely to result in reduced local car usage as it is closer to both the employment land allocations and Town centre. Additionally Option 2 could deliver all of the required housing development ‘in one hit’ and so would provide for greater level of contribution through planning obligations (a concern of Town Council members in Ilminster). Option 1 may require the development of another site and would result in a more dispersed loss of greenfield land. Option 3 is less favourable in landscape, townscape and biodiversity terms. In conclusion Option 2 is the preferred Option”

Proposed Submission South Somerset Local Plan

- 2.3 Consideration of comments received from the consultation on the Draft Core Strategy led to a re-evaluation of the Ilminster Options. The comments were evenly balanced between Option 1 and preferred Option 2. There was no support expressed for Option 3. The Town Council expressed a strong preference for Option 1 South East. This was because it would provide an alternative road route around the town centre acting as a bypass and providing better traffic circulation around the town. Development at Shudrick Valley would also, in the Town Council’s view,

**Examination Suspension Project Management Board – Item 4a
Workshop 30: 25th October 2013**

be better related to schools, shops, health employment and the town centre and protect views to and from Herne Hill.

- 2.4 In response to this local preference further work was undertaken by the Council to check the practicality and merits of the South East Option. In particular a traffic assessment was undertaken demonstrating that the development could be accessed without undue impact on the road network and the alternative route provided without causing traffic problems elsewhere in the town road network. A viability assessment was undertaken as part of the work on the CIL Evidence base document (Core Document No35) showing a Shudrick Valley scheme to be viable. Information was obtained demonstrating that there was landowner interest in development that could secure the total amount of additional housing needed for Ilminster within the Shudrick Valley option. Finally a review of the landscape appraisal for the area covered by Option 1 the South East was undertaken and clarified that there was the landscape capacity to accommodate the required housing provision.
- 2.5 The SA for Option 1 South East (Shudrick Valley) required review in the light of this further evidence. A revised SA for Option 1 was produced to take account of the new evidence and was presented in Appendix 7 of the Local Plan Sustainability Appraisal Report June 2012 (pages 39 – 41). The key changes to the appraisal as a result of the new evidence were as follows:
- Sustainability Objective 2. Reduce poverty and crime went from 0 to +
 - Sustainability Objective 4 Improve health and wellbeing went from 0 to +/-
 - Sustainability Objective 5. Improve education and skills of the population went from 0 to +
 - Sustainability Objective 8 Reduce the effects of traffic on the environment went from + to +/-
 - Sustainability Objective 9. Protect and enhance the landscape and townscape went from - to +
 - Sustainability Objective 13. Manage and reduce the risk of flood went from + to -
- 2.6 The appraisals for the two other Options were not revised or updated as a result of the consideration of representations and further work. It was considered that the new evidence did not provide further information specifically about these two other options and therefore did not significantly change the findings of the previous SA. The revised SA for the South East (set out in Appendix 7 of the Local Plan Sustainability Appraisal Report of June 2012) was then compared against the SA for the other two Options (Appendix 6A of the Local Plan SA Report June 2012).
- 2.7 The new evidence and revised SA helped to inform the Council's decision in selecting Option 1 (Shudrick Valley) as the preferred Direction of Growth for Ilminster. The conclusion to the revised SA in Appendix 7 of the Local Plan SA Report (June 2012) explained why the Council selected Option 1 Shudrick Valley as the Direction of Growth in the Proposed

**Examination Suspension Project Management Board – Item 4a
Workshop 30: 25th October 2013**

Submission South Somerset Local Plan 2006 -2028. The reasons are set out below:

“The ‘proposed submission’ plan proposes a different Direction of Growth - in the draft Core Strategy Option 2 (the South West) was the preferred Direction Of Growth, however, following receipt of the consultation responses, it is clear that Ilminster Town Council favour Option 1 (South East), over Option 2. When the direction of growth was previously considered Option 2 was preferred. The logic for this was based on the assumption that one comprehensive development may be able to ‘afford’ to deliver better community infrastructure than two schemes, and given the Town Council’s desire to obtain much needed community infrastructure, this was considered to be a very influential factor. Since the SA was undertaken, the Council is recommending to move to a CIL and therefore the argument for one comprehensive residential development to deliver infrastructure, as opposed to a number of smaller schemes, combined delivering the 332 dwellings, is less persuasive, although ideally access to services/facilities will be provided ‘on site’.

In considering the direction of growth further, issues were raised regarding highways and viability, and consultants were appointed to undertake an assessment of the capacity of the highway network to accommodate residential development at Shudrick Lane, and have indicated that the site can be reasonably accessed without undue impact on the road network or requiring major off site works. Baker Associates have appraised the viability of the site as part of their CIL Evidence Base market assessments and the site also appears to be viable.

Overall, given the finely balanced nature of the SA in respects of Options 1 and 2, the potential changes that may be introduced through adoption of CIL, the support of the town council and the expectation that the south east option could meet the total housing requirement for the town, it is considered that the preferred direction of growth for Ilminster be revised from Option 2 - South West to Option 1 - South East.

Examination

- 2.8 The Council set out in detail on the 18th March 2013 its reasoning behind changing the direction of growth from the South West (Canal Way) to the South East (Shudrick Valley) in its response to the direct pre examination question 3 of the Local Plan Inspector.
- 2.9 The Council in preparing its Hearing Statement for Ilminster discovered an error in its understanding of the agricultural land grading for the South East Option. The land is graded 3a and therefore identified as best and most versatile agricultural land which should be preserved where possible rather than the previous understanding that the land was ungraded. The significance criteria for SA objective 12 “Minimise pollution and waste production” for Shudrick Valley was therefore changed from a negative to a double negative to show the potential for a significant negative effect through the loss of best and most versatile agricultural land. The Council’s view was that despite this amendment:

**Examination Suspension Project Management Board – Item 4a
Workshop 30: 25th October 2013**

“Having duly taken in consideration the presence of Grade 3a agricultural land on Shudrick Valley and Grade 3b agricultural land on Canal Way, which was omitted from the original SA process, it is considered that the sustainability effects are likely to be largely similar to those previously identified through the SA process and the Shudrick Valley site is the most sustainable option for growth as it offers better linkages to the Town Centre and can provide an alternative vehicular route through Ilminster. In light of this the Council considers the SA process is still sound.

Additionally Ilminster is surrounded by significant amounts of Grade 2 and Grade 3a, agricultural land, and it is considered that the benefits of the Shudrick Valley site outweigh the loss of the agricultural land on this site.”

- 2.10 The Local Plan Inspector asked the Council to check the accuracy of the summary SA findings on page 1 of its response to his pre examination question 3. The Council acknowledged that there was an error in the summary score for Canal Way which in consequence had one less negative effect (3 not 4) and one more neutral effect (3 not 2) than indicated in the response. The Council now consider that the implications of the error are not of significance to the findings of the SA as the summary table was not part of the decision making process but rather part of a post decision summary review.
- 2.11 The Council’s final view in summary, incorporating the amendment for the corrected agricultural land information, comparing the three Options is set out for clarity in Appendix 1 of this Report.

3. Review of Sustainability Appraisal of Ilminster Direction of Growth

- 3.1 The three Options for the Ilminster Direction of Growth were subject to further appraisal by the Council using the same methodology as set out in Section 3 of the Local Plan Sustainability Appraisal Report of June 2012. This includes the same SA Framework as has been used throughout the SA process for the Local Plan.
- 3.2 The revised appraisals presented in this Section take account of further information and representations from stakeholders, which include the following:
- Evidence presented by representees to the Examination (including agents for Option 2 Canal Way)
 - New evidence (post examination suspension) in the form of a revised sustainability assessment presented by agents for Option 1 Shudrick Valley
 - Update to reflect construction of new Medical Centre on Canal Way
 - District Ecologist review of biodiversity evidence presented by representees
 - Incorporation of evidence relating to tree preservation orders and hedgerows present within the three Options
 - More explicit consideration of Options’ location in relation to Conservation Areas and Areas of High Potential Archaeological Importance

Examination Suspension Project Management Board – Item 4a
Workshop 30: 25th October 2013

- Comparative assessment of highways impact and relative opportunities for sustainable transport
 - Implications of requirement for replacement primary school associated with growth and Somerset County Council's stated preference for a Canal Way location
 - Potential disruption to agricultural businesses of prospective development
 - Further detail on the actual job opportunities available in the town centre and in the existing employment areas to west and south of the town
 - Propensity to out commute for jobs and services
 - Further consideration of relative merits of Options for renewable energy generation including wind energy as well as solar.
- 3.3 The representations and evidence submitted by stakeholders during the Examination is available on the Council's website:
- <http://www.southsomerset.gov.uk/planning-and-building-control/planning-policy/local-plan-2006-2028/local-plan-examination/post-submission-documents/issue-9/>
 - And also
 - <http://www.southsomerset.gov.uk/planning-and-building-control/planning-policy/local-plan-2006-2028/local-plan-examination/examination-timetable/mid-hearing-documents-accepted-or-requested-by-inspector/>
- 3.4 Any other information is set out in the compendium of further new evidence relating to Ilminster Sustainability Appraisal Review in Core Document No.
- 3.5 The revised SA for the three Options was subject to peer review by appointed Consultants Enfusion to ensure that the concerns of the Inspector were sufficiently addressed.

**Examination Suspension Project Management Board – Item 4a
Workshop 30: 25th October 2013**

3. Redrafted Sustainability Appraisal for Iminster Directions of Growth: Summary Findings

The appraisal matrices presented in Appendix 6A for the South West (Canal Way) and North Area Options (Options 2 and 3) and Appendix 7 for the South East (Shudrick Valley - Option1) of the Local Plan Sustainability Appraisal Report of June 2012 have been revised and are presented in this order below. These are then followed by a Summary Comparative Appraisal of Options Table.

Iminster Option 2 – South West (Canal Way)		
SA objective	Commentary	Score
1. Improve access to essential services and facilities	At its closest point, Option 2 is located within 600m of the Town Centre, with the centre of the option approx. 1,100m away. (these distances and all subsequent distances based on direct lines from the centres of the Options to public highway and then as direct as possible routing along public highways). This is still within easy walking and cycling distance of the Town Centre, but at its furthest point people might choose to travel by car instead. The Town Centre includes a wide range of services and facilities and is well served by convenience shopping opportunities with Tesco, Co-op and McColls all within walking and cycling distance from the more central and eastern parts of the proposed Option area. This Option is immediately adjacent to the new Medical Centre on Canal Way. There are two schools in Iminster - Greenfylde First School and Swanmead Community School and both are in reasonable proximity to Option 2 with Greenfylde School being approx. 900 metres from the centre of the South West Option and Swanmead being approximately 1,050 metres. A replacement school for Greenfylde, were it located at Canal Way as the Education Authority prefer, would be a distinct advantage for a Canal Way site in terms of accessibility. There would be the potential benefit of linked trips with the Medical Centre. Social exclusion is unlikely to be reduced although affordable housing will have to be provided as part of any development and Section 106 monies should be sought to provide a sports hall. Development should ensure that good walking/cycling links to the town are provided. Option has good access to existing services and facilities and potential for a minor long term positive effect.	+
2. Reduce poverty and social exclusion	Iminster does not rank highly in terms of deprivation, but new development could bring benefits to help to reduce poverty and social exclusion through the provision of affordable housing and community benefits as part of the overall proposal. Potential for a minor indirect long term positive effect.	+
3. Provide sufficient housing to meet identified needs of the community	The development of 332 additional homes will increase the range of housing available in Iminster and increase levels of affordable housing. The Strategic Housing Land Availability Assessment (SHLAA) illustrates that there is sufficient land to deliver in excess of 332 homes in this location. Potential for significant medium to long term positive effect through the provision of housing.	+ +

**Examination Suspension Project Management Board – Item 4a
Workshop 30: 25th October 2013**

4. Improve health and well being	All of the Options have the potential for minor negative effects on health in the short-term during construction. It is considered that suitable mitigation is available through Local Plan policies and at the project level to ensure that there are no significant effects on health during construction. The location of the new Medical Centre immediately adjacent this Option means that it would have excellent access to this health service. Dental and pharmacy facilities in the centre of town are less accessible and between 800m to 1,000m away from its nearest point and 1,300m and 1,500m from the centre of the Option area. Development will be on a Greenfield site, which may reduce ability to access green space, but an amount of open space will be expected through S106 agreement. Potential for a significant long-term positive effect associated with the closeness to medical facilities tempered by less accessible pharmacy and dental facilities.	+ +/-.
5. Improve education and skills of the population	Near existing primary (500m at nearest point) and middle schools (650m from nearest point). As for all the Options, there is the potential for a minor negative effect as there is no secondary school in Ilminster, so development will lead to more children travelling to Crewkerne and increased pressure on Wadham school. New replacement primary school provision should be facilitated by new development. New residents could increase the number of skilled workers to the economy. Potential for work-based training during construction period. Option has good access to existing primary and middle school so potential for long-term minor positive effect tempered by long term negative effect of “out bussing” of secondary school pupils to Crewkerne.	+/-
6. Reduce crime and fear of crime	Crime levels in Ilminster are relatively low (IMD). The application of Secure by Design principles will assist to design out crime, but uncertain until master planning carried out.	?
7. Support a strong, diverse and vibrant local economy	This option is the closest to saved employment allocations (600 metres away from the nearest point of the Option to the nearest point of the allocations) and closest to the existing areas of employment to the west of the town some 200 metres away from nearest point to nearest point. (wherein 35% of town’s total employment provision is to be found). The proximity to these areas could enable people to walk and cycle to work. Compared to the other Options this is not as close to the town centre employment (44% of town employment) and the Gooch and Housego factory and other employment to the south of the town (21% of town’s total employment). Easier access to the A303/ A358 is a potential benefit for employers by virtue of easier access to the national highway system but could encourage some leakage of retail expenditure out of the town to the disbenefit of local retailers and encourage potential out commuting. Opportunities to promote sustainable tourism are unlikely to be created. There is potential for a positive long-term effect through proximity to existing and future jobs tempered by a propensity to out commute from this option which has better access to the A303 and beyond than the other two Options.	+/-
8. Reduce the effect of traffic on the environment	Within walking distance to the town centre, so good opportunity to encourage walking and cycling if the correct links are put in place. This Option is the closest to the existing employment opportunities in the west of the town and the saved employment land allocations and therefore again has the potential to encourage walking and cycling if the links are available. However, it should be noted that this Option is less accessible to the employment opportunities in the town centre and at Gooch and Housego to the south of the town. By providing	+/-

**Examination Suspension Project Management Board – Item 4a
Workshop 30: 25th October 2013**

	<p>a balance of housing and employment land, there is potential for new residents to live and work within close proximity to each other, but there is no guarantee that the inhabitants of the new homes will work/shop etc. locally and given the rural nature of the district and the lack of strategic services in Ilminster, it is likely that growth will lead to increased traffic. This can however be mitigated by taking measures to encourage walking, cycling and public transport. In relation to increasing journeys by non-car modes cycle route 33 is traffic free along Canal Way with cycle friendly connections to residential areas and employment to the west. There are also good connections to cycle route 30 and good gradients for cyclists. There are good pedestrian links to the town centre and town generally. Bus stops exist close by on Canal Way. All three services (30 Taunton – to Axminster with hourly service, N10 Taunton to Martock with 4 per day and Service 9 Donyatt to Crewkerne with 3 per day) are accessible but this option is disadvantaged by the 30 service return journey from Taunton not going down Canal Way and requiring disembarkation in the town centre and similarly with N10 service. Good access to Service 9 from Canal Way routing. This option has good access to the town centre and existing and proposed employment to the west of town as well as the potential to utilise and promote public transport walking and cycling. Potential for a minor long-term positive effect on this SA Objective. All of the Options have the potential for a residual minor negative effect on traffic.</p>	
<p>9. Protect and enhance the landscape and townscape</p>	<p>Loss of greenfield land is negative. Most of the land is identified as being of low to medium landscape and visual sensitivity, and having high to moderate capacity to accommodate built development in the Peripheral Landscape Study. Topography may be an issue for any potential development as there is steeper ground constraining development the further south the development extends. This coincides with identified land with moderate to low capacity to accommodate growth, however it is considered that development can be accommodated without extending this far south. Proposed modern development on the currently undeveloped side of Canal Way would mirror that opposite. Mitigation including avoidance of the steeper more attractive southern slopes of the option will limit impact of proposed development with the potential for residual minor negative effects.</p>	<p align="center">-</p>
<p>10. Conserve and where appropriate enhance the historic environment</p>	<p>The historic environment will be maintained. The Option does not abut the south western edge of the Conservation Area which is 150 m away from its nearest point and is separated by modern housing. It is considered that the impact on listed buildings will be minimal. This Option is distant from the area of High Archaeological Potential (175m at its nearest point and separated by modern housing). Whilst not adversely affecting the historic environment neither is it enhancing it.</p>	<p align="center">0</p>

**Examination Suspension Project Management Board – Item 4a
Workshop 30: 25th October 2013**

11. Reduce contribution to climate change and vulnerability to its effects	All of the options have the potential to increase levels of carbon emissions through increased traffic and embodied energy in providing development (materials and construction methods used). Potential for a minor long-term negative effect on this SA objective. Potential for development to respond to the impacts of climate change through construction methods and materials utilising carbon-reducing technologies. Level area facing north facing slope at 400m from site. The Option is not advantageous to sun based energy generation and setting sun partly obscured by hill. The government has recognised that it is not always possible (cost-effective, affordable, technically feasible) for development to incorporate on-site measures to reduce carbon emissions and is currently proposing that development can achieve the zero carbon standard by mitigating remaining emissions off-site ¹ . Potential for a minor long-term positive effect which is negated by negative impact from lack of on-site renewable energy opportunities	+/-
12. Minimise pollution (including air, water, land, light, noise) and waste production	There is the potential for minor noise, fumes and dust created at construction stage. Increased population will result in increased traffic which has the potential for negative effects unless mitigated through travel planning at the outset. Recycling opportunities should be designed as part of new development, and sustainable construction encouraged. There is Grade 3a agricultural land in the south of this Option area; however, it is considered unlikely that development would extend this far and lead to the loss of best and most versatile agricultural land. The requirement to rationalise farm land holdings whilst uncertain indicates a negative impact on existing farming operations. Potential for a minor medium term negative effect on existing farming operations and a minor temporary negative effect through increased pollution.	-
13. Manage and reduce the risk of flooding	There are no significant areas of flood risk within this Option. Proposed Submission South Somerset Local Plan Policy EQ1 supports proposals for new development where it directs development away from medium and high risk flood areas and reduces and manages the impact of flood risk by incorporating Sustainable Urban Drainage systems, and through appropriate layout, design and choice of materials. There is some evidence of localised surface water flooding but it is considered that suitable mitigation is available. Development will afford the opportunity to resolve this and for this reason this option will have a minor positive impact	+
14. Conserve and enhance biodiversity and geodiversity	There are no wildlife or geodiversity designations within or in close proximity to this Option area so it is unlikely that there would be any significant effects on designated sites as a result of development. There is the potential for all three options to have some level of use by badgers, reptiles and other common wildlife e.g. roe deer, foxes, birds et al. However, as widespread and common species in this part of South Somerset it is considered that suitable mitigation will be available at any planning application stage and so no significant effects are likely. The European Protected Species in South Somerset Strategic Ecological Assessment Potential Strategic Housing Sites (2009) identifies that some parts of the option are within the foraging areas for Pipistrelle Bats a relatively common urban species. Any development proposals would have to include mitigation measures to address this. It is considered that significant effects are unlikely given the mitigation available at the project	?

¹ DCLG (Aug 2013) Next step to zero carbon homes - Allowable Solutions.

**Examination Suspension Project Management Board – Item 4a
Workshop 30: 25th October 2013**

	level and provided by Local Plan policies. However, there is still an element of uncertainty until project level surveys and assessments have been completed.	
<p>Conclusion: This Option has the potential for a significant long-term positive effect through being able to provide the overall housing requirement as well as indirect positive effects through the provision of affordable housing and community benefits. There is the potential for a minor positive effect on access to services and facilities as the Option is within 600m of the town centre and is adjacent to the new Medical Centre on Canal Way so there is the potential for a minor positive effect on the SA Objective relating to health. The Option is close to saved employment allocations and existing areas of employment to the west of the town (35% of town's total employment provision) so there is the potential for a positive effect in terms of access to employment. There is potential to improve walking and cycling routes as well as access to bus services which could reduce traffic impacts and potential to resolve localised flooding issues. However, it is considered that all the Options are likely to have a minor negative effect on traffic. The proximity of the A303 could result in out commuting however this is uncertain at this time. This Option would lead to the loss of greenfield land (albeit more attractive areas can be avoided) and would also have negative effects on existing farm operations. The appraisal did not identify the potential for any significant negative effects as a result of development in this Option area.</p>		

Ilminster Option 3 – North		
SA objective	Commentary	Score
1. Improve access to essential services and facilities	<p>Option 3 is on the north side of the Town Centre approximately 250m away at its closest point and 650m from the centre of the Option area This is within easy walking and cycling distance of the town centre, but at the furthest north of the Option people might choose to travel by car instead, especially as walking from the town centre would involve walking uphill. The Town Centre includes a wide range of services and facilities and is well served by convenience shopping opportunities with Tesco, Co-op and McColls. The building of the new Medical Centre off Canal Way has made the service less accessible to Option 3 as distance required to travel has increased. There are two schools in Ilminster - Greenfylde First School and Swanmead Community School. Both are south of the Town Centre and both are approximately 900 metres from the centre of the North Option. Should a replacement school for Greenfylde be provided on Canal Way as preferred by Somerset County Council in order to serve the whole town then this will be further away from the Northern Option than the existing primary school. Social exclusion is unlikely to be reduced although affordable housing will have to be provided as part of any development and Section 106 monies will be sought to provide a sports hall. Development should ensure that good walking/cycling links to the town are provided. This Option has good access to the town centre albeit affected by topography and is further away from the new Medical Centre than Option 2 with a potential therefore for a minor long term positive effect.</p>	+

Examination Suspension Project Management Board – Item 4a
Workshop 30: 25th October 2013

2. Reduce poverty and social exclusion	Ilminster does not rank highly in terms of deprivation, but new development could bring benefits to help to reduce poverty and social exclusion through the provision of affordable housing and community benefits as part of the overall proposal. Potential for a minor indirect long term positive effect.	+
3. Provide sufficient housing to meet identified needs of the community	The development of 332 additional homes will increase the range of housing available in Ilminster and increase levels of affordable housing. The SHLAA indicates that there is insufficient land to deliver the required number of homes, with the potential for a significant long-term negative effect against this SA objective.	--
4. Improve health and well being	All of the Options have the potential for minor negative effects on health in the short-term during construction. It is considered that suitable mitigation is available through Local Plan policies and at the project level to ensure that there are no significant effects on health during construction. New Medical Centre is situated on the other side of the town centre. Access to town centre dental and pharmacy facilities is good and within 400 metres for most of the Direction of Growth albeit up slope on the return journey. Development will be on a Greenfield site, which may reduce ability to access green space, but an amount of open space will be expected through S106 agreement. Potential for a minor positive effect due to access to dental and pharmacy facilities but also a minor negative effect given greater distance to the Medical Centre (it is a similar distance from Option 3 to the Medical Centre as from option 1 to the Medical Centre).	+/-
5. Improve education and skills of the population	The North option is near the existing primary and middle schools (500m from nearest point to primary school and 550m from middle school). As for all the Options, there is the potential for a minor negative effect as there is no secondary school in Ilminster, so development will lead to more children travelling to Crewkerne and increased pressure on Wadham school. New replacement primary school provision should be facilitated by new development. New residents could increase the number of skilled workers to the economy. Potential for work-based training during construction period. Option 3 has good access to existing primary and middle school so potential for a minor long term positive effect tempered by long term negative effect of “out bussing” of secondary school pupils to Crewkerne	+/-
6. Reduce crime and fear of crime	Crime levels in Ilminster are relatively low (IMD). The application of Secure by Design principles will assist to design out crime, but uncertain until master planning carried out.	?

**Examination Suspension Project Management Board – Item 4a
Workshop 30: 25th October 2013**

<p>7. Support a strong, diverse and vibrant local economy</p>	<p>This option is around 1,300 metres to the saved employment allocations from its nearest point and the employment potential they represent and 1,000 metres from the employment areas in the west from nearest point to nearest point. It is close enough to enable people to walk and cycle to work in the town centre (44%), but is further away than Option 2 to employment existing employment in the west. Opportunities to promote sustainable tourism are unlikely to be created. A location for residential development nearer to the town centre, where people can walk easily to access services, goods and facilities is considered very desirable. Given the proximity of the town centre (250m away from the Option areas closest point), there are more opportunities to support local shops and services, which will be beneficial for the local economy. An increase in residents provides an increased local workforce. Closeness to the town centre means this Option has the potential for a significant long term positive effect on the economy however tempered by distance from the west employment areas and allocations.</p>	<p>+ +/-</p>
<p>8. Reduce the effect of traffic on the environment</p>	<p>The Option is close to the town centre, to existing employment to the west of town and to save employment land allocations, so presents a good opportunity to encourage walking and cycling if the correct links are put in place. There is the potential for new residents to live and work within close proximity to each other and for walking, cycling and public transport to be encouraged. In relation to increasing journeys by non-car modes the eastern side of the Option would link well with cycle routes 30 and 33 and proximity to centre will promote cycle use although the gradient associated with the Option will act as a deterrent to cycling for some. Good pedestrian links to the town centre and town generally although gradient will again be an issue for some. Bus stops exist close by on West Street and the Butts and are accessible in the town centre. Service 30 northbound to Taunton is not easily accessed as it travels along Canal Way (not through the town centre) – N10 Taunton to Martock with 4 per day is accessible along the B 3168 from the North Option but the Service 9 Donyatt to Crewkerne route is less accessible as it is routed along Canal Way from the Market Square on the return journey from Crewkerne. This option has good access to the town centre and existing employment as well as the potential to promote public transport, walking and cycling. This is tempered by the topography and the routing of some Bus routes along Canal Way. Potential for a minor long-term positive effect on this SA objective. All of the Options have the potential for a residual minor negative effect on traffic.</p>	<p>+/-</p>
<p>9. Protect and enhance the landscape and townscape</p>	<p>Loss of greenfield land is negative. Half of the Option land is identified as being of medium landscape sensitivity whilst the other half is of high landscape sensitivity and all is identified as having high visual sensitivity. The majority of the land has a low capacity to accommodate built development in the Peripheral Landscape Study. Topography may be an issue for any potential development as there is steep ground constraining development on part of the site. This option has good pedestrian access to the wider countryside. The Option could not easily be assimilated into the town as it will by virtue of its location above the town tend to over dominate and it will not easily link into existing development. Existing development is closed off and does not open out into the higher land of the Option beyond it. Mitigation is not practical and development here would have the potential for a significant negative long-term effect on this SA objective.</p>	<p>--</p>

Examination Suspension Project Management Board – Item 4a
Workshop 30: 25th October 2013

10. Conserve and where appropriate enhance the historic environment	The historic environment will be maintained. This Option is close to the northern edge of the Conservation Area and so development will be required to take impact on Conservation Area into account in these areas and potential mitigation may be needed. Impact on listed buildings will be minimal. The Option is adjacent to the Area of High Archaeological Potential in two small areas and so development will be required to take impact on Archaeological Potential into account in these areas and potential mitigation may be needed. There is the potential for a negative effect on the historic environment; however, it is considered that suitable mitigation is available through the Local Plan and at the project level to address the potential significant negative effects, with minor residual negative effects remaining.	-
11. Reduce contribution to climate change and vulnerability to its effects	All of the options have the potential to increase levels of carbon emissions through increased traffic and embodied energy in providing development (materials and construction methods used). Potential for a minor long-term negative effect on this SA objective. Potential for development to respond to the impacts of climate change through construction methods and materials utilising carbon-reducing technologies. South facing slopes provide opportunities for solar gain and a beneficial location atop a slope provides opportunities for wind energy generation. The government has recognised that it is not always possible (cost-effective, affordable, technically feasible) for development to incorporate on-site measures to reduce carbon emissions and is currently proposing that development can achieve the zero carbon standard by mitigating remaining emissions off-site ² . The double potential benefit of new construction techniques and in particular the potential on-site for both wind and solar power prompt a significant positive effect	+ +/-
12. Minimise pollution (including air, water, land, light, noise) and waste production	There is the potential for minor short term negative effects through noise, fumes and dust created at construction stage. Increased population will result in increased levels of traffic, which has the potential for negative effects unless mitigated through travel planning at the outset. Recycling opportunities should be designed as part of new development, and sustainable construction encouraged. The Option is Greenfield land and will lead to the loss of some Grade 2 and predominantly Grade 3a best and most versatile agricultural land that should be protected from development in the normal course of events. This Option is similar in impact to the other two in terms of temporary increased pollution during construction; however, the loss of grade 2 and 3a agricultural land has the potential for significant long term negative effect.	--
13. Manage and reduce the risk of flooding	There are no significant areas of flood risk within this Option. Proposed Submission South Somerset Local Plan Policy EQ1 supports proposals for new development where it directs development away from medium and high risk flood areas and reduces and manages the impact of flood risk by incorporating Sustainable Urban Drainage systems, and through appropriate layout, design and choice of materials. Neutral effect against this SA objective.	0

² DCLG (Aug 2013) Next step to zero carbon homes - Allowable Solutions.

Examination Suspension Project Management Board – Item 4a
Workshop 30: 25th October 2013

<p>14. Conserve and enhance biodiversity and geodiversity</p>	<p>There are no wildlife or geodiversity designations within or in close proximity to this Option area so it is unlikely that there would be any significant effects on designated sites as a result of development. There is the potential for all three options to have some level of use by badgers, reptiles and other common wildlife e.g. roe deer, foxes, birds et al. However, as widespread and common species in this part of South Somerset it is considered that suitable mitigation will be available at any planning application stage and so no significant effects are likely. The European Protected Species in South Somerset Strategic Ecological Assessment Potential Strategic Housing Sites (2009) identifies that some parts of the option are within foraging areas for Pipistrelle Bats and that there are maternity colonies for Brown Long-eared Bats in this location. Additionally there is a hibernation roost for Lesser Horseshoe Bats in this location and it is significantly used. Any development proposals would have to include suitable mitigation measures to address potential impacts on the bat species and the roosts. Given the presence of maternity colonies and hibernation roosts for Lesser Horseshoe Bats it is considered that there is the potential for a significant short to long-term negative effect on biodiversity.</p>	<p style="text-align: center;">- -</p>
<p>Conclusion: This Option has the potential for a positive effect against SA objectives relating to access to facilities/services as it is within 250m of the town centre at its closest point. There is also the potential for a positive effect on the economy as the Option has good access to existing employment within the town centre, providing access to jobs and support for town centre businesses. It has potential to improve walking and cycling routes as well as access to bus services which could reduce traffic impacts. However, it is considered that all of the Options are likely to have a minor negative effect on traffic and there are topographical barriers to pedestrian movement. There is the potential for significant long-term negative effects as the Option cannot accommodate the required level of development, has high landscape sensitivity, would lead to the loss of best and most versatile agricultural land and has Lesser Horseshoe Bat maternity colonies and hibernation roosts present.</p>		

**Examination Suspension Project Management Board – Item 4a
Workshop 30: 25th October 2013**

Proposed Submission Local Plan Policy PMT3 Ilminster Direction of Growth (Option 1 from Draft Core Strategy)		
SA objective	Commentary	Score
1. Improve access to essential services and facilities	The Direction of Growth is located within easy walking and cycling distance of the Town Centre being only 150m at its closest point and 550 m from the Option centre. The Town Centre includes a wide range of services and facilities and is well served by convenience shopping opportunities with Tesco, Co-op and McColls. The South East Option is the closest of the three options and without the disbenefit of topography of the North Option. It is significantly closer than the South West Option both at its closest and from middle to middle of Option to town centre. The new Medical Centre is approx. 950m from the closest part of the Direction of Growth and 1350 m from the centre of the Option. This is not considered easy walking distance, but cycling would be an option. There are two schools in Ilminster - Greenfylde First School and Swanmead Community School, and both are in close proximity to the Direction of Growth with Greenfylde 550 m from the closest part and 950m from the Option centre and Swanmead immediately adjacent at its closest and 400m from the centre of the Option. A replacement school for Greenfylde were it located at Canal Way as the Education Authority prefer in order to serve the whole town would be further away from this Option to its potential relative detriment in terms of accessibility. Social exclusion is unlikely to be reduced although affordable housing will have to be provided as part of any development and Section 106 monies should be sought to provide a sports hall. Development should ensure that good walking/cycling links to the town are provided. The proximity to the town centre with its services and facilities provides for a significant positive contribution towards sustainable development. Potential for a significant positive effect against this SA objective.	+ +
2. Reduce poverty and social exclusion	Ilminster does not rank highly in terms of deprivation, but new development could bring benefits to help to reduce poverty and social exclusion through the provision of affordable housing and community benefits as part of the overall proposal. Potential for a minor indirect long term positive effect.	+
3. Provide sufficient housing to meet identified needs of the community	Residential development will increase the range of market housing and affordable housing available in Ilminster. A viability assessment of the site has been undertaken and this indicates that the site is deliverable and can 'afford' 35% affordable housing. The SHLAA illustrates that there is sufficient land to deliver in excess of 332 homes in this location. Potential for significant medium to long term positive effect through the provision of housing.	+ +
4. Improve health and well being	All of the Options have the potential for minor negative effects on health in the short-term during construction. It is considered that suitable mitigation is available through Local Plan policies and at the project level to ensure that there are no significant effects on health during construction. The location of the new Medical Centre at Canal Way makes the Shudrick Valley Option relatively less accessible but there is good access to town centre Dentists and pharmacies. Potentially by providing residential development in close proximity to the existing centre, this may encourage people to walk more to access sites and facilities, which would be beneficial to	+/-

**Examination Suspension Project Management Board – Item 4a
Workshop 30: 25th October 2013**

	health. Development will be on a Greenfield site, which may reduce ability to access green space, but an amount of open space will be expected through S106 agreement. Potential for positive effect due to access to dental and pharmacy facilities but negative effect given greater distance to Medical Centre (similar distance from option 1 to medical centre as from option 3 to Medical Centre).	
5. Improve education and skills of the population	The Option is near to the existing primary school (550m from nearest point) and immediately adjacent the middle school. As for all the Options, there is the potential for a minor negative effect as there is no secondary school in Ilminster, so there will be increased pressure on Wadham school in Crewkerne. New replacement primary school provision will be facilitated by development. New residents could increase the number of skilled workers to the economy. Potential for work-based training during construction period. Option has good access to existing primary and very good access for middle school so potential for long term positive effect tempered by long term negative effect of “out bussing” of secondary school pupils to Crewkerne	+/-
6. Reduce crime and fear of crime	Crime levels in Ilminster are relatively low (IMD). The application of Secure by Design principles will assist to design out crime, but any impacts are uncertain until master planning carried out.	?
7. Support a strong, diverse and vibrant local economy	Of the options considered for Ilminster this Option is the furthest away from the existing employment sites (approx. 1.7km) to the west of town where 35% of town’s total employment is located and the employment potential of the saved Local Plan employment allocations. However, the option is better located for the jobs available in the town centre and the south of the town including the Gooch and Housego site (65% of town’s total employment in total) enabling people to walk and cycle to work. A location for residential development nearer to the town centre, where people can walk easily to access services, goods and facilities is considered very desirable. Given the ease to access the town centre, there are more opportunities to support local shops and services, which will be beneficial for the local economy. An increase in residents provides an increased local workforce. The very good access to town centre employment opportunities and the support to be given to town centre businesses makes for a significant positive contribution tempered only by the distance of this option from the employment potential for new jobs in the allocations to the west of town.	+ +/-
8. Reduce the effect of traffic on the environment	This Direction of Growth Option is close to the town centre, with a good opportunity to encourage walking and cycling if the correct links are put in place. There is the potential for new residents to live and work within close proximity to each other and for walking, cycling and public transport to be encouraged. It is a distance from the Strategic Employment Allocations, therefore there may be an increase in traffic over time. In relation to increasing journeys by non-car modes this option has good access to cycle route 33 and 30 although routes are not traffic free in the immediate vicinity. Good permeability should be possible to the town centre and there are good gradients for cyclists. Good pedestrian links to the town centre and proximity is a major benefit to encourage walking. Bus stops are close by on Orchard Vale and in Market Square. This is the best of options to access No.30 service both ways from Market Square and Orchard Vale and similarly for N10 service from Market Square in both directions. There is good access to No. 9 service from Market Square. The Direction of Growth Policy refers to an expectation that a road link between Shudrick Lane and Townsend/Long Orchard	+ +/-

**Examination Suspension Project Management Board – Item 4a
Workshop 30: 25th October 2013**

	<p>Hill, be provided prior to completion of the development. The long held community aspiration to provide an alternative route through Ilminster, whilst avoiding the Town Centre can be provided by this option. The delivery of this road will not reduce the effect of traffic on the town centre but will not generate traffic outside the capacities of the directly affected junctions and it will provide an alternative route option for residents to access the town and navigate around the town. This Option's excellent access to the town centre and existing employment and good access to bus and cycling facilities as well as promoting walking and the ability to provide an alternative route for traffic around the centre all point to a significant positive benefit associated with development tempered only by potential distance from new employment opportunities to the west arising over time. All of the Options have the potential for a minor residual negative effect on traffic; however, this Option provides opportunities to provide an alternative route through Ilminster which the other Options do not.</p>	
<p>9. Protect and enhance the landscape and townscape</p>	<p>Loss of Greenfield land is negative, but most of the land is identified as being of low to medium landscape and visual sensitivity, and having high to moderate capacity to accommodate built development in the Peripheral Landscape Study across most of the identified option. Small but significant areas of landscape however with a moderate to low capacity to accommodate built development exist within the Option area. Topography may be an issue for any potential development as there is steeper ground constraining development immediately to the south. Unlike the other two Options a number of trees have protection through Tree Preservation Orders within the proposed Direction of Growth including three groupings of trees. The Council's Proposed Modification 182 to the area covered by this Option serves to exclude most of the tree preservation orders but not all and excludes two of the three tree groupings (at Bakers Copse and Pretwood Copse) from the proposed Direction of Growth. A relatively close pattern of mature hedgerows exists with the potential for historic hedgerows to be identified. The Council's amended Option 1 proposed direction of growth seeks to exclude the most sensitive area with moderate to low capacity although the land agents show prospective development in this area in their Concept Plan submitted with the Council's Examination Hearing Statement on Issue 9. The same agent's subsequent Revised Sustainability Appraisal August 2013 Core Document No) indicates in figure 10 a recognition that landscape with a moderate to low capacity for accommodating development is a site constraint presenting a sensitive area for town setting. Assimilation into the town would not be easily achieved given the need to link into developments that front towards the town centre and along Townsend. There is a relatively poor wider access to the countryside due to the paucity of public footpaths. The pockets of high landscape sensitivity along with a number of Tree Preservation Orders means there is the potential for a significant medium to long term negative effect on this SA objective.</p>	<p>--</p>

**Examination Suspension Project Management Board – Item 4a
Workshop 30: 25th October 2013**

10. Conserve and where appropriate enhance the historic environment	The Direction of Growth Option abuts the south eastern edge of the Conservation Area and development is likely to require mitigation. This Option has the largest boundary with the existing Conservation Area. Impacts on listed buildings will be minimal. The northern margin of the Option is within the Area of High Archaeological Potential. There is the potential for a significant negative effect on the historic environment on both Conservation and Archaeology considerations and despite the prospect of suitable mitigation through the Local Plan and at the project level.	--
11. Reduce contribution to climate change and vulnerability to its effects	All of the options have the potential to increase levels of carbon emissions through increased traffic and embodied energy in providing development (materials and construction methods used). Potential for a minor long-term negative effect on this SA objective. Potential for development to respond to the impacts of climate change through construction methods and materials utilising carbon-reducing technologies. The Option presents mainly shallow but steepening north facing slope although northern parts are shallow south facing. The Option is not advantageous to sun based energy generation. The government has recognised that it is not always possible (cost-effective, affordable, technically feasible) for development to incorporate on-site measures to reduce carbon emissions and is currently proposing that development can achieve the zero carbon standard by mitigating remaining emissions off-site ³ . Potential for a minor long-term positive effect.	+/-
12. Minimise pollution (including air, water, land, light, noise) and waste production	There is the potential for minor short term negative effects through noise, fumes and dust created at construction stage. Increased population will result in increased levels of traffic, which has the potential for negative effects unless mitigated through travel planning at the outset. Recycling opportunities should be designed as part of new development, and sustainable construction encouraged. This Option will lead to the loss of Grade 3a agricultural land. The loss of Townsend farm, a viable farming business is a disadvantage although relocation on other parts of the landholding of both the owners and tenant's operations will serve to effectively mitigate the impact. Potential for a minor medium term negative effect on existing farming operations and a significant long-term negative effect through the loss of best and most versatile agricultural land.	--
13. Manage and reduce the risk of flooding	There are no significant areas of flood risk on this Option. Proposed Submission South Somerset Local Plan Policy EQ1 supports proposals for new development where it directs development away from medium and high risk flood areas and reduces and manages the impact of flood risk by incorporating Sustainable Urban Drainage systems, and through appropriate layout, design and choice of materials. The Environment Agency considers that residential development is acceptable providing there is suitable mitigation. There is some evidence of localised surface water flooding but development will afford the opportunity to resolve this and for this reason this Option will have a minor positive impact.	+

³ DCLG (Aug 2013) Next step to zero carbon homes - Allowable Solutions.

**Examination Suspension Project Management Board – Item 4a
Workshop 30: 25th October 2013**

<p>14. Conserve and enhance biodiversity and geodiversity</p>	<p>There are no wildlife or geodiversity designations within or in close proximity to this Option area so it is unlikely that there would be any significant effects on designated sites as a result of development. There is the potential for all three Options to have some level of use by badgers, reptiles and other common wildlife e.g. roe deer, foxes, birds et al. However, as widespread and common species in this part of South Somerset it is considered that suitable mitigation will be available at any planning application stage and so no significant effects are likely. The European Protected Species in South Somerset Strategic Ecological Assessment Potential Strategic Housing Sites (2009) identifies that some parts of the Direction of Growth are within foraging areas for Pipistrelle Bats and there are maternal colonies of long eared bats around the eastern end of Ilminster. Any development proposals would have to include mitigation measures to address these matters and given the small element of foraging area covered by the option it is very unlikely that a significant detrimental impact would result. Potential for a minor long-term negative effect on biodiversity; however, there is an element of uncertainty until project level surveys and assessments have been completed.</p>	<p style="text-align: center;">?</p>
<p>Conclusion: This Option has the potential for significant positive effect in relation to town centre access and ability to provide all the housing required as well as indirect positive effects through the provision of affordable housing and community benefits. It is close to the town centre and existing employment to the south (which comprise 65% of the town's total employment provision) and has the potential to improve pedestrian links as well as public transport and address local flooding issues. This Option is further away from the existing employment in the west and saved employment allocations compared to the other Options. Positive scores are also obtained from proximity to town centre dental and pharmacy facilities, proximity to schools and tempered by distance from the new Medical Centre. There is the potential for significant long-term negative effects on landscape and the historic environment given its abutting of the Conservation Area and impingement into the Area of High Archaeological potential as well as pollution, through the loss of best and most versatile agricultural land.</p>		

**Examination Suspension Project Management Board – Item 4a
Workshop 30: 25th October 2013**

Summary Comparative Appraisal of Options for Ilminster Direction of Growth

Sustainability Objective	Strategic Options			Summary Comparative Appraisal
	Option 1 (Shudrick Valley)	Option 2 (Canal Way)	Option 3 (North)	
1. Services and facilities	++	+	+	Reason for the difference is that Shudrick valley is the closest to the town centre And whilst the North option is close its beneficial effect is hampered by topography
2. Poverty and social exclusion	+	+	+	No significant difference.
3. Housing	++	++	--	Reason for the difference is that the North Option cannot accommodate the identified housing need. This difficulty clearly needs to be given considerable and special weight in any comparison.
4. Improve health and well being	+/-	+ +/-	+/-	Reason for the difference is that the Canal Way Option is adjacent to the new Medical Centre which is given special prominence tempered by distance from pharmacy and dentists
5. Education and skills	+/-	+/-	+/-	No significant difference. It should be noted that the County Council have a preference for growth to the south west by Canal Way given its centrality to the primary school catchment but its absence from the school building programme means that this matter must be viewed with some uncertainty
6. Crime	?	?	?	No significant difference.
7. Economy	+ +/-	+/-	+ +/-	The negative effect identified for Canal Way is based on the proximity of the A303 and potential for out commuting. .
8. Traffic	+ +/-	+/-	+/-	It should be noted that the Shudrick Valley Option has the potential for further benefits over the other Options as it could provide an alternative route through the town; however, at this stage this is uncertain.
9. Landscape and	--	-	--	The Shudrick Valley and North Options have areas of higher landscape sensitivity; therefore there is the potential for a greater negative effect compared to the Canal Way Option.

**Examination Suspension Project Management Board – Item 4a
Workshop 30: 25th October 2013**

Sustainability Objective	Strategic Options			Summary Comparative Appraisal
	Option 1 (Shudrick Valley)	Option 2 (Canal Way)	Option 3 (North)	
townscape				
10. Historic environment	--	0	-	Shudrick Valley has a bigger interface with the Conservation Area and impinges the Area of High Archaeological Potential
11. Climate change	+/-	+/-	+ +/-	No significant difference other than the North Option provides greater opportunity for on-site renewable energy generation. There is the potential for the other options to meet the zero carbon standard by mitigating remaining emissions off-site as per the government's proposal for allowable solutions.
12. Minimise pollution	--	-	--	Development at the Shudrick Valley and North Options would lead to the loss of best and most versatile agricultural land.
13. Flooding	+	+	0	No significant difference once mitigation is taken into account although localised flooding issues are expected to be required to be addressed at Shudrick Valley and Canal Way
14. Biodiversity and geodiversity	?	?	--	The North Option contains Lesser Horseshoe Bat maternity colonies and hibernation roosts, therefore the potential for a significant negative effect.

**Examination Suspension Project Management Board – Item 4a
Workshop 30: 25th October 2013**

5. SA Summary

- 5.1 The revised SA has identified the likely significant effects of development at the three Option areas. The North Option (Option 3) whilst having significant potential benefit for the town centre economy and for on-site renewable energy generation crucially cannot accommodate the required level of development needed for Ilminster so is identified as having the potential for a significant long-term negative effect on the SA objective relating to housing. The appraisal also identified the potential for significant negative effects on landscape as well as pollution (through the loss of best and most versatile agricultural land). Lesser Horseshoe Bat maternity colonies and hibernation roosts are also present in the Option so there is the potential for a significant negative effect on biodiversity.
- 5.2 The Shudrick Valley Option (Option 1) is the closest to the town centre and the existing employment opportunities and services/facilities it provides. Development has the significant potential to improve pedestrian links and support the local economy with significant positive effects on accessibility. This option is also the only one to offer the potential to provide an alternative route through the town. The potential for significant long-term negative effects were identified for landscape as a result of areas of high landscape sensitivity and the presence of Tree Preservation Orders. Greater proximity to the Conservation Area than other options and impingement on the Area of High Archaeological Potential present a prospect of significant negative effects. Development would also lead to the loss of best and most versatile agricultural land with a significant long-term negative effect on the SA objective relating to pollution.
- 5.3 The Canal Way Option (Option 2) is further from the town centre compared to the other Options but closer to saved employment allocations and existing employment to the west. This Option is also adjacent to the new Medical Centre with the potential for positive effects on accessibility and health. As for Option 1 there is the potential to improve pedestrian links as well as support the local economy even if the potential benefits are likely to be slightly reduced given the further distance from the town centre. The revised SA did not identify any significant negative effects in relation to this Option; however, it should be noted that the proximity of the A303 could result in out commuting but this is uncertain. It should also be noted that the County Council's stated preference is for a site adjacent to Canal Way as a replacement school location by virtue of its centrality to the primary school catchment (albeit a specific scheme is not identified in the County Council's Schoolbuilding programme).
- 5.4 The findings of the revised SA of the Options for the Direction of Growth for Ilminster have informed the proposed Main Modifications considered later in this Report.

6. Conclusion and Recommendation for the Ilminster Direction of Growth

- 6.1 The requirement from the EU SEA Directive is that the reasons for selecting/rejecting options should be made clear. The SA is a key aid to the decision making process. It is considered that the following criteria are most relevant to determine the location of the Direction of Growth for Ilminster.

Examination Suspension Project Management Board – Item 4a
Workshop 30: 25th October 2013

This reflects and is consistent with the criteria applied in the case of the Yeovil Sustainable Urban Extension and much of the evidence in relation to each criteria is presented in the SA and considered in determining the preferred location for growth. These criteria are:-

- Deliverability and viability for housing and employment
- Market Capacity
- Infrastructure deliverability
- provision of services and facilities
- mitigation potential
- added opportunities and benefits

- 6.2 The North Option crucially falls down at the outset by virtue of lack of evidence of deliverability. It is not promoted in the Strategic Housing Land Availability Assessment (nor the emerging 2013 update) and hasn't been championed through the Local Plan process. This is a crucial failure that effectively rules out this particular Option in the presence of other Options that are promoted and that do provide planning benefits. The South West and South East options are both identified in the Strategic Housing Land Availability Assessment update 2013 and have been championed by prospective developers.
- 6.3 The Local Plan Housing Trajectory shows a clear ability to deliver the required housing for Ilminster and an expectation that the housing requirement for the town can be met. There is capacity on both the South West and South East options to deliver the residual requirement for housing after accounting for current commitments.
- 6.4 The Revised Sustainability Report produced by CG Fry for Land at Shudrick Lane (see Core Document No to be given later) includes a baseline assessment including consideration of Highways and Transportation (and here it refers to the WS Atkins transport study commissioned by South Somerset District Council), ground conditions, drainage (surface water and foul) and does not find any overriding constraints for the South East Option. A detailed Transport Assessment has been undertaken by Peter Brett Associates as part of evidence presented to the Examination Hearing on Ilminster on behalf of Somerset County Council and has found the South West location to be fully and reasonably accessible. Consultation with statutory consultees through the Local Plan process do not indicate any infrastructure concerns or particular advantages for developing either of these Options as a direction of growth.
- 6.5 In relation to the provision of services for both North and Shudrick Valley Options the proximity to the town centre is a major plus by virtue of promoting the local town centre economy and the services provided there and supporting non car modes of travel (so easing potential adverse traffic impacts of development). The Canal Way site however is also within reasonable proximity to the centre.
- 6.6 The prospect of a new replacement primary school is a point however in favour of the Canal Way Option given the County Council's stated preference for a site adjacent Canal Way by virtue of its centrality to the primary school catchment. Should this stated preference be delivered then the school will be immediately adjacent a Canal Way Direction of Growth. The weight given to

Examination Suspension Project Management Board – Item 4a
Workshop 30: 25th October 2013

this matter needs to be tempered though by the fact that at the present time the County Council's preference has been made by officials and a new school scheme is not present in the Council's Schools capital programme. There is of course a "catch 22" consideration here in that until a scale of growth and direction for Ilminster is established through the Local Plan there is insufficient certainty to justify placing a scheme in the County Council Capital programme.

- 6.7 The potential to mitigate adverse impact on landscape, use of agricultural land, localised flooding, renewable energy generation and biodiversity is overall better for the South West (Canal Way) Option and in an assessment across a range of sustainability objectives this potential for mitigation is an important plus factor.
- 6.8 An important added opportunity and benefit to be considered is the potential benefits of the Shudrick Valley Option by virtue of its delivering an alternative route around the town centre to provide better and varied circulation in accord with initial Town Council views. This is tempered by the fact that these views have not been maintained by the Town Council and there has been evidence of substantial numbers of residents holding counter views. The fact remains that the Shudrick Valley option would deliver an alternative route for Ilminster traffic to access/traverse the town.
- 6.9 The Canal Way Option presents a potential benefit of building upon the adjacent Ilminster sports provision (Football and Cricket Clubs) to provide expanded main sports provision for the town. Conversely with other Options comes the opportunity to provide other open sports provision around the town although it is felt that the expansion at Canal way would be the greater benefit.
- 6.10 Taking the sustainability assessment review all together presents a picture of relative pros and cons for all three Options for growth for Ilminster. It is felt important to avoid significant negative impacts of growth and in this regard Canal Way is notable by the absence of any such significant negative effects. It is felt that the loss of agricultural land of best and most versatile quality in both North and Shudrick Valley Options and their significant adverse impact on the landscape are major disadvantages of both of these Options. It is not felt appropriate to promote the North Option when it cannot accommodate the housing requirement in terms of volunteered land and has a potential impact on a rarer bat species. Similarly the Shudrick Valley Option's potential impact on Conservation Area and Area of High Archaeological Potential is also a significant negative factor.
- 6.11 For both North and South East (Shudrick Valley) Options the proximity to the Town Centre is a significant positive in relation to the economy, service retention and promotion of non-car modes of travel. These are not felt strong enough however to overcome the major disadvantages identified with these Options in relation variously to landscape (both), agricultural land (both), heritage (Shudrick Valley) and biodiversity (Shudrick Valley) however. The South West (Canal Way) Option whilst having less significant positive effects has no significant negative impacts and its negative potential impacts are generally more mitigatable. It is felt that the absence of significant negative

Examination Suspension Project Management Board – Item 4a
Workshop 30: 25th October 2013

effects more than compensates for the positives associated with the other two option's proximity to the town centre.

7. Soundness issue 2 Policy PMT3; Ilminster Direction of Growth – proposed Main Modification

Proposed Main Modifications arising from paragraphs 54 and 55 of Inspectors Preliminary Findings – 3 July 2013

Proposed Main Modification:

Deletion of direction of growth to South East of town (Shudrick Valley) and replacement with direction of Growth to South West (Canal Way)

Justification for Change:

During the Examination the Council sought to justify its Direction of Growth to the South East of Ilminster (Shudrick Lane) shown in the Proposed Submission Local Plan. The Inspector has indicated in his Preliminary Findings that the Council, in correcting for an error in the Sustainability Appraisal for the town, has said that Canal Way scores better than Shudrick Lane. He has concluded similarly and found that the Council's Direction of Growth to the South East of town is unsound because it is not justified when considered against the reasonable alternative of Canal Way.

The Council has reviewed the evidence presented to the Examination Hearing Session and revised the Ilminster Direction of Growth Sustainability Appraisal (as presented in Appendix 6A and 7 of the Council's Local Plan Sustainability Appraisal Report June 2012) in the light of valid objections made at Examination and new evidence made available to the Council (or pursued following consideration of objections). The revised appraisal, representations made at Examination and additional evidence has helped to inform the Council's decision on what should be the preferred direction of growth for Ilminster.

Issue Summary:

The correction of two errors in the Sustainability Appraisal set out in the Council's Sustainability Appraisal Report June 2012 and the Council's pre Examination response to the Examination Inspector's question 3 for the Ilminster Direction of Growth has led to revised SA of the options for growth around Ilminster. Of the arguments presented in Appendix 7 conclusion of the Council's Local Plan Sustainability Appraisal Report June 2012) the adoption of CIL is now to be applicable to all proposals once adopted, the Ilminster Town Council's support for the Shudrick Lane Option is not substantiated through consultation on the Proposed Submission South Somerset Local Plan and delivery of the overall housing provision is expected for both South East and South West options. The review of objectors' comments at Examination, review of new

**Examination Suspension Project Management Board – Item 4a
Workshop 30: 25th October 2013**

evidence emerging and re appraisal and rescoring have led to a change of conclusion in relation to which Direction of Growth is most appropriate. The South West (Canal Way) Direction of Growth is now considered most appropriate.

Implication for Policy, Supporting Text and Proposals Map:

The Policy PMT 3 Ilminster Direction of Growth, its supporting text and the Proposals Map Ilminster Inset map 7 are amended as shown below to clearly indicate the change in the proposed Direction of Growth for Ilminster. This is a Proposed Main Modification to the Local Plan

The Main Modification is presented in the table below. The reference number (to be inserted) is the Examination Suspension Proposed Main Modification Number and relates to all changes within the table below as they all reflect the same Main Modification and are in consequence to it. The PSSSLP in columns 2 and 3 is an abbreviation of Proposed Submission South Somerset Local Plan 2006 – 2028. The Proposed Main Modification column presents the changes to the Proposed Submission Plan with additional text shown underlined and deleted text shown as crossed through. (Text in blue reflects minor modifications arising from Full Council on the 17th January 2013 and are incorporated for completeness and comprehension). Examination issue and source are self-explanatory

Ref	PSSSLP Page	PSSSLP Policy/ Para	Proposed Main Modification	Examination Issue	Source
	107	PMT3	<p>Policy PMT3: Ilminster Direction of Growth</p> <p>The direction of strategic growth will be to the south east west of the town. As part of any proposed development within the Direction of Growth, a road will be expected to be provided between Shudrick Lane and Townsend/Long Orchard Hill prior to its completion.</p>	Issue 9	Response to Inspector's Preliminary Findings
	106	6.83 – 6.84	<p><u>Direction of Growth</u></p> <p>6.83 In order to accommodate the proposed level of residential development in Ilminster, a 'Direction of Growth' has been identified</p>		

**Examination Suspension Project Management Board – Item 4a
Workshop 30: 25th October 2013**

		<p>to the south east <u>west</u> of the town (see Proposals Map). The direction has been derived using evidence from the Sustainability Appraisal, Highway Capacity Assessment (2011), local consultation and an assessment of the potential deliverability of sites for development. It is anticipated that the majority of the residential requirement will be delivered within the 'Direction of Growth' as capacity within the existing urban area is limited.</p> <p>6.84 There is a local aspiration for a road to be delivered as part of any residential development in the Direction of Growth. This would link Shudrick Lane and Townsend/Long Orchard Hill and offer an alternative route through the town centre, alleviating local concerns over town centre traffic. Developers will be expected to deliver this road (see Highways assessment for detailed information [5]).</p> <p><u>Delivery</u></p> <p>6.85 The following delivery bodies will be key in implementing the proposed development at Ilminster:</p> <ul style="list-style-type: none"> • South Somerset District Council; • Somerset County Council; • Town and Parish Councils; • Developers and Landowners. <table border="1" data-bbox="600 1246 1375 1305"> <tr> <td data-bbox="600 1246 987 1305">Monitoring Indicators</td> <td data-bbox="987 1246 1375 1305">Target</td> </tr> </table>	Monitoring Indicators	Target		
Monitoring Indicators	Target					

**Examination Suspension Project Management Board – Item 4a
Workshop 30: 25th October 2013**

			Completed housing development in Ilminster	531-496 homes built in Ilminster between 2006 and 2028				
			Completed employment ('B' uses) floor space in Ilminster	23 ha of 'B' use employment land built made available in Ilminster between 2006 and 2028				
			Road between Shudrick Lane and Townsend/Long Orchard Hill	Prior to completion of development within the Direction of Growth				
	Inset map7	Inset Map 7	<p>123. [Proposed Residential Development East of Shudrick Lane, Ilminster (October 2011)]</p> <p>Annotate map with newly proposed direction of growth to the south west and mark current proposed Submission Plan Direction of Growth for deletion – (see proposals map attached)</p>					

**Examination Suspension Project Management Board – Item 4a
Workshop 30: 25th October 2013**

8. Habitat Regulation Assessment

- 8.1 A Habitat Regulation Assessment has been undertaken by the Council to assess the impact of policies and proposals in the Local Plan on internationally designated nature conservation designations namely the Somerset Levels and Moors and the Bracket's Coppice Special Area of Conservation.
- 8.2 Policy SS4 Delivering new Housing Growth of the draft Core Strategy published in October 2010 and including a provision of 531 dwellings for Ilminster and 16,600 dwellings for the District overall with a preferred direction of growth identified at that time at South West Ilminster (Canal Way) was assessed directly at that time. The conclusion of the Assessment was that policy SS4 "will not result in an adverse impact on the integrity of the Somerset levels and Moors Special Protection Area or Ramsar designated sites" (Core Documents No 66.section 6.1 pp 42)
- 8.3 A separate and specific appropriate assessment was undertaken for Bracket's Coppice Special Area for Conservation (important for a Bechstein bat colony) close to the South Somerset Border some 6km to the east of Crewkerne. This Assessment similarly concluded that Policy SS4 would have "no significant likely effect". (Core Document 67 para 5.11 pp17).
- 8.4 These Assessment conclusions remain unchanged by the Proposed Submission South Somerset Local plan 2006 – 2028 and the now proposed Main Modification 5 and retain their validity.

9. Equality Analysis Review

- 9.1 The Council is required to ensure that all policies, strategies and service functions and activities have given proper consideration to equalities as set out in section 149 of the 2010 Equalities Act. An Equalities Analysis has been undertaken for the Proposed Submission South Somerset Local Plan 2006 -2028 and for Policy PMT3 Ilminster Direction of Growth (i.e. Shudrick Valley Option). Following a screening exercise presented in the Equality Analysis document it was concluded that the Ilminster Direction of Growth policy did not affect some groups of society differently and therefore a 2nd stage analysis was not required. It is considered that the amendment of the Policy PMT 3 to the South West Canal Way Option:-
- Is not a change to service delivery
 - Does not affect the Council's workforce or employment practices
 - Is not a financial/budget decision and
 - would not affect some groups of society differently
- 9.2 Through Policy PMT3 the Council is seeking to accommodate Ilminster's assigned growth in a sustainable manner. Growth for Ilminster wherever located will serve to help sustain facilities and services in the centre and throughout the town. The Canal Way site is generally accessible to the town centre and particularly accessible to the Medical Centre and to school locations and has good pedestrian and cycling and public transport links and on relatively level gradients. Whilst the option is not as close to the centre as

**Examination Suspension Project Management Board – Item 4a
Workshop 30: 25th October 2013**

the Shudrick Valley Option it remains positively located in that regard and has compensatory benefits in relation to older persons given its access to the Medical Centre. On balance the likely impact of differences in location between Canal Way and the previously appraised Shudrick Valley are not considered sufficiently different to require a different screening assessment from that given to Shudrick Valley in the original Equality Analysis.

- 9.3 Accordingly the proposed Main Modification does not require further analysis for any potential different impact on different groups of society. It is considered that the Equality Analysis requirement has been fulfilled and the main Modification proposed does not require changing as a consequence.

**Examination Suspension Project Management Board – Item 4a
Workshop 30: 25th October 2013**

**Appendix 1: Sustainability Appraisal Summary of Direction of Growth Options
(corrected for agricultural land amendment to Option 1) – from appendices 6
and 7 of Local Plan Sustainability Appraisal Report of June 2012**

SA Objective	Option 1 Shudrick Valley	Option 2 Canal Way	Option 3 North
1. Improve access to essential services	++	+	+
2. Reduce poverty and social exclusion	+	0	0
3. Provide sufficient housing to meet identified needs of the community	+	++	+
4. Improve health and well being	+/-	+	0
5. Improve education and skills of the community	+	0	0
6. Reduce crime and fear of crime	?	?	?
7. Support a strong diverse and vibrant community	+	++	+
8. Reduce the effect of traffic on the environment	+/-	+	+
9. Protect and enhance the landscape and townscape	+	-	--
10. Conserve and where appropriate enhance the historic environment	0	0	0
11. Reduce contribution to climate change and vulnerability to its effects	+	+	+
12. Minimise pollution (including air, water, land,	--	-	--

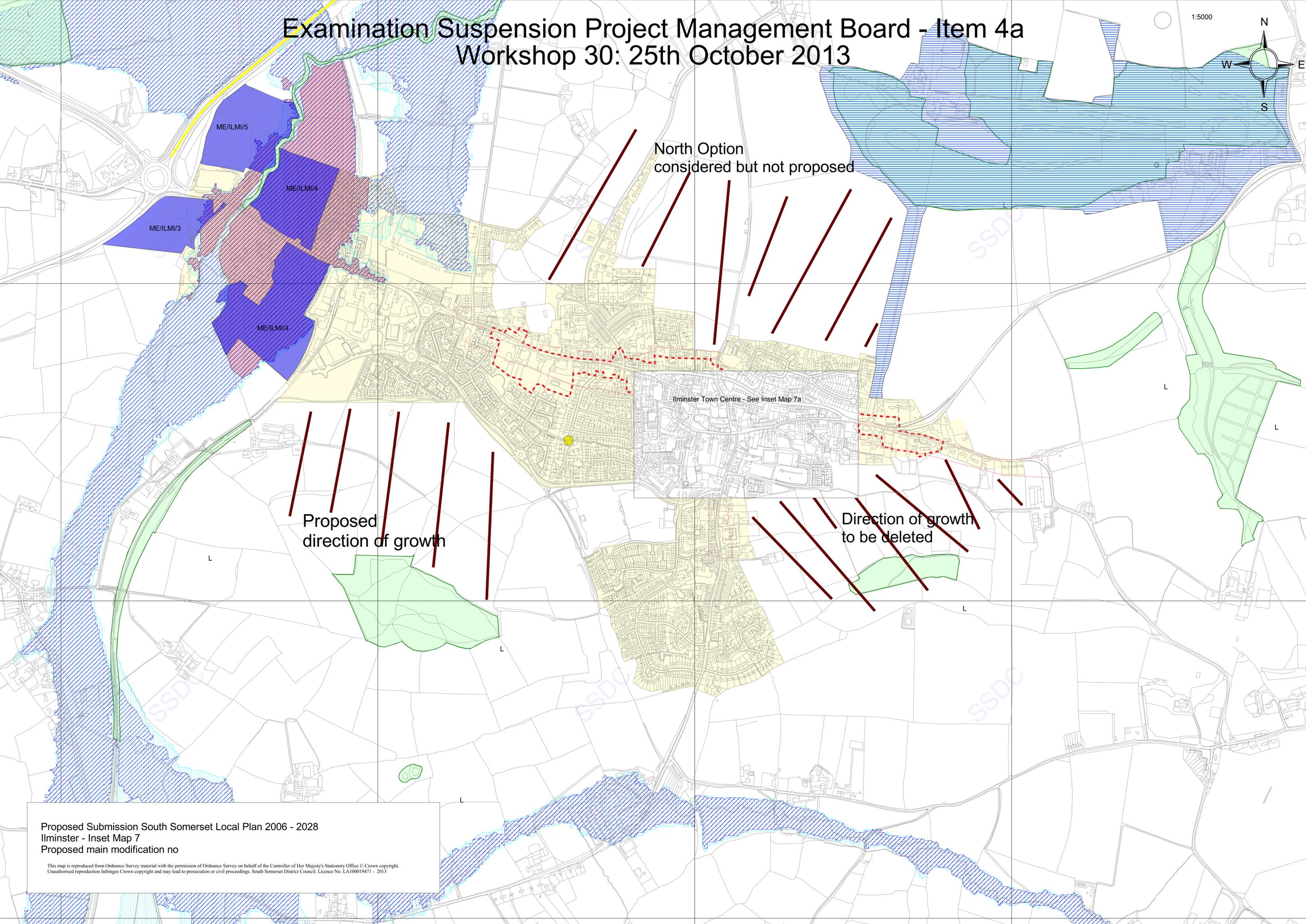
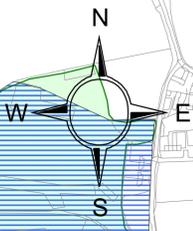
**Examination Suspension Project Management Board – Item 4a
Workshop 30: 25th October 2013**

light, noise) & waste prod/ion			
SA Objective	Option 1 Shudrick Valley	Option 2 Canal Way	Option 3 North
13. Manage and reduce the risk of flooding	-	+	+
14. Conserve and enhance biodiversity and geodiversity	-	-	--

Examination Suspension Project Management Board - Item 4a

Workshop 30: 25th October 2013

1:5000



ME/ILMI/5

ME/ILMI/4

ME/ILMI/3

ME/ILMI/4

North Option
considered but not proposed

Proposed
direction of growth

Direction of growth
to be deleted

Ilminster Town Centre - See Inset Map 7a

Proposed Submission South Somerset Local Plan 2006 - 2028
Ilminster - Inset Map 7
Proposed main modification no

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