

Proposed Submission South Somerset Local Plan 2006 – 2028 Examination Suspension: Proposed Main Modifications Consultation Document

1. Introduction

- 1.1. This report provides an account of the work undertaken in relation to the consultation responses on the Proposed Main Modifications to the Proposed Submission South Somerset Local Plan 2006-2028.
- 1.2. This report sets out the following:
 - Background and context to the Local Plan process and the consultation process;
 - Key issues raised by consultees in relation to the Proposed Main Modifications;
 - An analysis of these key issues, documenting South Somerset District Council's response;
 - A conclusion on whether the key issues raised prompt a change to the Local Plan policies set out in the Proposed Main Modifications; and
 - Next steps and recommendations for Project Management Board to endorse.

2. Background

- 2.1. The Proposed Submission South Somerset Local Plan 2006-2028 was submitted to the Planning Inspectorate on 21st January 2013. As part of the Independent Examination of the Local Plan, a number of Hearing Sessions were held between 7th May and the 18th June 2013. Based upon the conclusions reached during these Hearing Sessions and consideration of the evidence base to support the Local Plan, the Inspector issued a Preliminary Findings letter on 3rd July 2013.
- 2.2. In the Preliminary Findings letter the Inspector identified six issues of concern – three significant issues of concern relating to soundness, and three points of clarification. Based upon these six issues, the Inspector concluded that he would not be able to find the Local Plan sound, and that further comprehensive work was required in order to enable the Local Plan to be found sound.
- 2.3. Based upon these findings, on the 15th July 2013, South Somerset District Council (hereon 'the Council') requested a six-month suspension to the Independent Examination in order to rectify the issues raised. The Inspector agreed this course of action on the 17th July 2013, and subsequently agreed a programme of work running from July 2013 to March 2014.
- 2.4. The additional work undertaken by the Council to address the Inspector's Preliminary Findings form the basis for the Proposed Main Modifications to the Submission Local Plan 2006 - 2028. The detail behind this additional work can be found here: <http://www.southsomerset.gov.uk/pmb30>
- 2.5. The Proposed Main Modifications were approved for consultation by District Executive on the 7th November 2013 and Full Council on the 21st November 2013. The Proposed Main Modifications have since been subject to consultation between 28th November 2013 and 10th January 2014.

- 2.6.** The Council has sought to discharge its duties under Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), and its own Statement of Community Involvement¹, by making the Proposed Main Modifications available to both specific consultation bodies and general consultation bodies. It has also sought to discharge the “Duty to Co-operate” as prescribed under Regulation 4 of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), by actively engaging with the “Prescribed Bodies”².
- 2.7.** In total 1,039 responses to the consultation were received, from 881 respondents. The Council also received a petition signed by 318 people³. A detailed breakdown of the number of responses received, by Proposed Main Modification, is set out in Table 2.1 below.

Table 2.1: List of Number of Responses per Proposed Main Modification

Proposed Main Modification	Support	Object	Observation	Total
Introduction	0	4	0	4
PMM1 & PMM2	0	31	3	34
PMM1	1	18	1	20
PMM2	7	348	4	359
PMM3	439	71*	3	513
PMM4	4	18	2	24
PMM5	3	16	1	20
PMM6	1	3	1	5
PMM7	1	8	1	10
PMM8	0	0	1	1
Minor Mods	0	2	1	3
SA	5	33	1	39
Other	0	0	7	7
Total	461	552	26	1039

*One of these objections includes the petition signed by 318 people.

- 2.8.** All of the consultation responses received have been reviewed and considered. Analysis of the consultation responses has highlighted a number of key issues. The Council's analysis and response to these key issues is set out in Section 3 below, with each of the Inspector's six areas of concern addressed in order.

¹ South Somerset District Council: Statement of Community Involvement, Appendix 2 (July, 2007)

² A detailed account of the Duty to Co-operate process can be found here: http://www.southsomerset.gov.uk/media/457227/10_duty_to_cooperate_report.pdf, with an update note scheduled to be tabled to District Executive and Full Council for approval prior to use at the resumption of the Examination.

³ The petition signed by 318 people was in relation to Proposed Main Modification 3 – Ilminster Direction of Growth and is associated with the modification made to Policy PMT3. It is listed as one objection against PMM3 in Table 2.1.

3. Analysis of Key Issues Arising From Consultation Responses to Proposed Main Modifications

3.1. Soundness Issue 1: Policies YV1 – Urban Framework and Greenfield Housing Requirement for Yeovil, and YV2 – Yeovil Sustainable Urban Extension (Proposed Main Modification 1 and Proposed Main Modification 2)

- 3.1.1. The Inspector's Preliminary Findings raised a significant issue of concern in relation to the Sustainability Appraisal for the Yeovil Sustainable Urban Extension. He gave a very detailed analysis of the elements of the Sustainability Appraisal (SA) where he did not find that the Council's existing submission was sufficiently conclusive to arrive at a definitive outcome. In particular, he considered that more detailed work was needed on potential alternative locations for a Sustainable Urban Extension (SUE) before the development of an SUE to the south of Yeovil could be properly considered and deemed sound.
- 3.1.2. To help address the Inspector's concerns an independent review of the SA was undertaken by Enfusion. Their work re-confirmed that the SA objectives used to appraise growth options remained valid, but did seek to utilise new and additional evidence, such as, an updated landscape addendum. The "Strategic Growth Options for Yeovil – Sustainability Report" (October 2013) provides a clear, concise appraisal of the growth options for Yeovil, and represents an addendum to the other SA work prepared since 2009.
- 3.1.3. In establishing and appraising "reasonable alternatives" it was important to focus on options that could be deliverable within the Local Plan timeframe (2006 – 2028). In doing so, this highlighted that seeking to identify options that could deliver 2,500 dwellings was not justified, as it did not reflect the housing need required in the Local Plan period – and as identified in the Inspector's Preliminary Findings. Therefore a figure of 1,565 dwellings, based on the identified housing need over the Local Plan period was used to define reasonable alternatives.
- 3.1.4. The findings of the revised SA helped inform the options assessment carried out by the Council. In conjunction with other planning considerations such as deliverability, viability, and market demand it was shown that none of the growth options considered would be effective in delivering sustainable development in one, single location. As such, having regard to those other key factors it was proposed that two SUEs would be set out in the Proposed Main Modifications.
- 3.1.5. This is detailed in Proposed Main Modification 1 (PMM1), which revises Policy YV1 in terms of the overall number of dwellings to be delivered in Yeovil and the SUEs; and Policy SS5 in terms of clarifying there will be two SUEs and that growth will be delivered within the Local Plan period.
- 3.1.6. Proposed Main Modification 2 (PMM2) sets out the detailed revisions to Policy YV2 and the specifics relating to the location and scale of the two SUEs; and Policy YV6 in terms of the consequences on objectives for delivering more sustainable travel patterns in the SUEs.

Analysis of the Key Issues and the Council’s Response

- 3.1.7. There were 20 responses for PMM1, 1 in support, 18 in objection, and 1 observation. There were 359 comments made for PMM2, 7 in support, 348 objections and 4 observations. There were 34 consultation responses made in relation to both PMM1 and PMM2 combined, of which 31 were objections, 0 objections, and 3 observations.
- 3.1.8. Key stakeholder respondents include: Wessex Farm Trust, Taylor Wimpey, East Coker Parish Council, East Coker Preservation Trust, and Yarlinton Housing Group.
- 3.1.9. The following key issues⁴ were identified for Yeovil in relation to PMM 1 and PMM 2 and Policy YV1, Policy YV2, and Policy YV6. Against each of the key issues, the Council’s response is noted:
 - i. PMM1: Removal of post-Local Plan period housing requirement for Yeovil, identification of two Sustainable Urban Extensions**
- 3.1.10. PMM 1 sets out the revision to the overall number of dwellings planned to be delivered within Yeovil over the Local Plan period and clearly states that this growth will be delivered in two SUEs.

Key Issue	South Somerset District Council Response
<p>There is no need for an urban extension because the ONS figures suggest a lower housing figure, and it is based upon flawed employment projections. Yeovil does not have the employment base to accommodate this growth level.</p>	<p>This issue was discussed in-depth during Examination Hearing Issue 4 and is set out in the Council’s response to the Inspector’s question 5 regarding household statistics (1.5.2013). Furthermore, the methodological issues surrounding this matter are discussed in paragraph 4.14 of the Housing Topic Paper [CD 14] and are explained in Appendix 13 in the email to John Baker (Baker Associates) dated 17 October 2012 and his subsequent response to the District Council [CD 14, Appendix 13]. Minor Modifications 49-58 (Core Document 3b) address the matter. In summary, whilst the Council recognises an occupancy rate of 2.27 persons per dwelling excluding communal establishments (January 2011) the figure for household occupancy rate has been retained (from the Baker report) at 2.1 persons per household on the basis that we consider it is too early to assess whether the declining fall of the rate of occupancy is a long term change in household composition or a blip as a result of the recession. Additionally, because the Government are not addressing the Census issue in any holistic way until they produce the 2012 Household Projections in the summer/autumn 2014, the Council considers its approach robust until further projections become</p>

⁴ It is recognised that there are a number of other issues which have been raised in relation to Policy YV1, YV2, and YV6 and PMM1 and PMM2, including: considering the impact of army units relocating from Germany; loss of flora and fauna; loss of Public Rights of Way; capacity levels at sewerage management facilities; and potential impact on high pressure gas line. These other issues are being considered in detail and the analysis will be published later for consideration by the Council’s District Executive, Full Council, and also for use during the resumption of the Local Plan Examination.

	<p>available that initiate a review.</p> <p>Regarding employment in Yeovil and employment projections, these were fully explored on two occasions at the Local Plan Hearing Sessions in May and June and the Council’s mid hearing statement H036. The Council has provided additional evidence and has also amended Policy SS3 to acknowledge the necessary employment land allocations for Yeovil and the district as a whole.</p> <p>It is of significance that the Inspector considered these topics during the Examination Hearing Sessions but did not then raise this issue in his Preliminary Findings. As such, these issues have not formed part of the additional work undertaken by the Council.</p>
<p>The Inspector did not ask the Council to find a solution for 1,565 dwellings, but for 2,500 dwellings (para 52 of Inspector’s preliminary findings).</p>	<p>The Council contends that in order to represent a robust appraisal of “reasonable alternatives” it was necessary for the additional SA work undertaken by Enfusion in October 2013, and the Council’s own analysis of options, to focus on the number of dwellings that could be delivered within the Local Plan period only. As such, 1,565 dwellings represent the objectively assessed housing requirement for Yeovil, within the Local Plan period.</p>

3.1.11. **Conclusion:** The consideration of issues raised in relation to Yeovil’s housing growth does not affect the overall decision to reduce the number of overall number of dwellings within Yeovil, clarify the number of dwellings to be delivered in the SUEs, and to focus on delivery within the Local Plan period only.

ii. PMM2: Details to specific changes relating to the two Sustainable Urban Extensions and the consequences for sustainable travel objectives

3.1.12. There have been a number of objections raised in relation to PMM 2 and the identification of two SUEs, one at “Upper Mudford” and one at “Coker”.

3.1.13. There have also been a number of general issues raised which have also been considered. Many of the responses question the approach taken to the SA carried out by Enfusion in relation to the Strategic Growth Options for Yeovil. A summary of the representations made on the SA for the Strategic Growth Options for Yeovil and the recommendations which stem from the analysis can be found at Appendix A.

GENERAL

Key Issue	South Somerset District Council Response
<p>The southern option is a considerable distance from East Coker and provides buffer zones etc to protect sensitive areas such as the Roman Villa. Do not understand why there is such a large buffer zone still protecting East Coker when the development is so far away.</p>	<p>The reduced scale of the direction of growth means that there is a reduced level of justification for the buffer zone to prevent coalescence with Yeovil and preserve the historic assets at North/East Coker.</p>

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<p>No justification for the Buffer Zone as it conflicts with the NPPF (para 77) – therefore delete policy YV3 and amend proposals map.</p>	
<p>Proposals map for Yeovil does not have a full key therefore judgement cannot be passed.</p>	<p>The purpose Map 1 of the Proposed Main Modifications Consultation Document , November 2013 is to show the proposed change to the Direction of Growth to the south of the town and the proposed new Direction of Growth to the north east at key is provided to indicate these proposed modifications. Proposed Submission Local Plan Inset Map 15 was used as a base but the modifications apply only to the Directions for Growth. However it is accepted that it would be useful to include a full key within the Proposed Main Modification Document.</p>
<p>The revised proposals can no longer deliver 50% of travel originating from the development by non-car modes – the previous approach of 2,500 dwellings and employment land was a much better match to achieve this. The deletion of a secondary school will have a significant impact on vehicular trips external to the development. 35-40% is more realistic.</p>	<p>Noted. A change may be necessary to the non-car travel requirement in Policy YV6 to reflect the fact that development will be delivered across two Sustainable Urban Extensions. Evidence submitted by Somerset County Council suggests that developments of the scale proposed at the two Sustainable Urban Extensions would not be capable of achieving at least 50% non-car mode share.</p> <p>The recently completed Parsons Brinckerhoff traffic modelling work (See Appendix B) has highlighted that the revised scale and location of growth do not have a detrimental impact on the local or strategic highway. However, there is little evidence to support a strict policy in order to deliver at least 50% of travel by non-car modes. In conjunction with the evidence provided by SCC and the Highways Agency it would be appropriate to reconsider the wording of Policy YV6.</p> <p>In terms of the impact of the removal of the secondary school, the Council contends that the scale of growth does not justify a new secondary school (and existing school capacity can accommodate growth). Therefore, transport impacts will have to be managed through a whole town network approach, utilising other Local Plan policies, such as TA1, TA3, TA4, and TA5. The Parsons Brinckerhoff report (Appendix B) demonstrates that the impact of delivery at two sites <i>“on the key junctions are generally small”</i>. Whereas where the modelling shows development is <i>“concentrated in full at one site, the impacts on the key junctions is generally higher”</i>.</p>
<p>The overall housing numbers in Yeovil will result in the existing secondary schools having insufficient capacity and there remains a need for a new additional secondary school site at some point. The division into two urban extensions means that neither have the critical mass to</p>	<p>Agree that further work on secondary school provision is required. The supporting text in the proposed main modifications (para 2.13) states contributions will be sought for secondary school provision, but agree that this should in policy. Recommendation: Insert “education” as a bullet point into policy SS6: Infrastructure Delivery,</p>

<p>support such a site, so detailed studies are required to inform where a new secondary school would be most sustainable and deliverable, and when this becomes critical. A policy should be included to secure the S. 106 and CIL contributions necessary.</p>	<p>along with appropriate supporting text. Undertake studies, in conjunction with Somerset County Council, on the delivery of an additional secondary school to inform an allocation in the Site Allocations DPD.</p>
<p>The Sustainability Appraisal unfairly scores Area C too negatively on almost every count. This is evidence of deficiency in the Sustainability Appraisal in failing properly to appraise baseline environmental conditions and likely effects of the Plan, in contravention of the Strategic Environmental Assessment Regulations and the National Planning Policy Framework.</p>	<p>The Sustainability Appraisal has been carried out independently, consistently and robustly. Area C has significant constraints in terms of landscape impact, flood risk, and the potential loss of Grade 1 and Grade 2 agricultural land. The site is severed from the built form of Yeovil due to the railway line and river – this affects the viability and deliverability of the site.</p>
<p>The overall housing numbers in Yeovil will result in the existing secondary schools having insufficient capacity and there remains a need for a new additional secondary school site at some point. The division into two urban extensions means that neither have the critical mass to support such a site, so detailed studies are required to inform where a new secondary school would be most sustainable and deliverable, and when this becomes critical. A policy should be included to secure the S. 106 and CIL contributions necessary.</p>	<p>Agree that further work on secondary school provision is required. The supporting text in the proposed main modifications (para 2.13) states contributions will be sought for secondary school provision, but agree that this should in policy.</p>

3.1.14. Conclusion: The analysis of the general issues, highlights the following:

- The buffer zone set out in Policy YV3 may no longer be required due to the revised scale of growth the south of Yeovil;
- Additional transport assessment work reveals that impacts on highway network can be managed, but it is unlikely that Policy YV6 could be implemented as currently written.
- Secondary school education capacity remains an area of concern for respondents, the Council and SCC. An education topic paper will be produced to clarify approach and establish a way forward to support the implementation of Policy YV2 and education provision in Yeovil (see bullet point below).
- Education should be inserted as a component of Policy SS6: Infrastructure Delivery, along with updating the supporting text.

UPPER MUDFORD

3.1.15. The main issues raised in relation to the SUE at Upper Mudford are:

Key Issue	South Somerset District Council Response
<p>Landscape impact - Concerned that development will have significant landscape impact, over a very large area. It would destroy one of the most beautiful views in South Somerset, previously</p>	<p>It is accepted that there will be a significant landscape impact as acknowledged by the Landscape Addendum (LA, paras 5D2-5D3). That impact is not extensive, and has capacity for mitigation (LA 5D7). However, development</p>

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<p>designated as a 'Special Landscape Feature'. The high sensitivity is stated in the landscape addendum sections 5D.2, 5D.3.</p>	<p>here will enable more sensitive areas at Yeovil's edge to remain free from development (Peripheral Landscape study (PLS) Fig.5).</p> <p>There is no Special Landscape Feature designation within the current adopted Local Plan 1991 - 2011.</p>
<p>Historic Environment - The north east site would have an unacceptable impact on the historic environment, as Mudford has the best preserved collection of medieval shrunken settlements in Somerset and one of the earliest post-medieval enclosures in Somerset – discovered by Mick Aston (Time Team). It is also closer to the Roman town of Ilchester.</p>	<p>The Historic Environment Assessment shows the area as having high historic landscape sensitivity and a low historic asset sensitivity, concluding that there is a 'moderate' capacity for development. The presence of the shrunken medieval village to the north of the direction of growth is noted, and there is high potential for unknown archaeology⁵. It is considered that any adverse impacts can be suitably mitigated through an archaeological assessment and landscaping/40% green space provision. Although this area is closer to Ilchester than the southern option, the distance is too great to cause significant impact on the settlement.</p>
<p>Flood Risk - Development on the steep escarpment will exacerbate existing flooding problems in Mudford village and Up Mudford through extra run off, made worse by development at Wyndham Park.</p>	<p>The Environment Agency⁶ identify that further work will be required within the masterplanning stages to more accurately map any local flooding issues. Whilst they consider that there will be an engineering solution to surface water runoff, they suggest that the Council should consider undertaking a flood risk management strategy (FRMS) to include surface water within the strategic allocation to prevent increasing flood risk to the downstream catchment. The FRMS is essential to understand any possible constraints on land availability required for development and the future Sustainable Drainage Scheme (SuDS). The SuDS must maximise the environmental benefits in accordance with emerging Local Plan policies EQ1 and EQ5.</p> <p>Paragraph 4.17 of The Report on Infrastructure Planning in South Somerset, January 2012 [CD 36] identifies that with regards to flood mitigation both funding and delivery will be through the developers and will be taken into account as part of the development viability assessments. Where costs are high it is likely that development will not proceed until values have risen.</p>
<p>Highways/traffic - There would be an unacceptable traffic impact on the already overburdened A359 and surrounding approach roads (e.g. Lyde Rd, Mudford Rd, Combe Street Lane, Sherborne Rd), and the villages of Mudford, Marston Magna and Queen Camel, which will cause safety issues.</p>	<p>Noted. The additional traffic modelling work undertaken (see Appendix B) has been prepared which details the traffic impact of various growth options. This evidence shows congestion at the Mudford Road/Combe Street Lane junction increasing by only 1% in the AM peak, changing from 'some' congestion to 'high' congestion; and the journey time from Mudford to Hospital roundabout increasing by 33 seconds in the AM peak (30% non-car travel). These results are not</p>

⁵ Historic Environment Assessment of Yeovil Periphery, July 2010; Archaeological Issues, Somerset CC, January 2014.

⁶ Local Plan Proposed Main Modifications response, January 2014.

	deemed significant.
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- 3.1.16. **Conclusion:** The consideration of issues at Upper Mudford does not affect the overall decision made to identify the location as a SUE.

COKER

Key Issue	South Somerset District Council Response
Agricultural land quality - Object to the loss of grade 1 agricultural land (and resulting impact on food production), contrary to the NPPF and the Inspector's preliminary findings. Grade 1 constitutes only 5% of land in the UK, and should be treated the same as valuable listed buildings.	<p>The presence of grade 1 agricultural land is an important issue, and local authorities should seek to use areas of poorer quality land in preference to that of a higher quality (NPPF, para 112). The Government's National Policy Statements⁷ define "poorer quality" agricultural land as grades 3b, 4 and 5. In considering the range of planning issues, it is not possible to avoid some loss of grade 1 agricultural land for a Sustainable Urban Extension of a minimum of 500 dwellings.</p> <p>The Sustainable Urban Extension at Coker would result in a loss of around 0.9% of the grade 1 agricultural land in South Somerset (as opposed to around 2.9% in the Proposed Submission Local Plan).</p> <p>Unsure of the source that 5% of land is grade 1 – Natural England (TIN049, Dec 2012) estimate that grades 1 and 2 together form around 21% of all farmland in England, and grade 3a also covers around 21%.</p>
Landscape impact - Object due to adverse landscape impact, and the site was previously rejected in the landscape report produced in 2003. The Landscape study and its addendum have not been consistent in assessing the periphery of Yeovil and do not adequately reflect important elements of the landscape.	<p>Earlier Local Plan Inquiry (2003) comments were given in response to specific development proposals objecting to council allocations. The baseline is now changed, such that sites that were previously resisted are now being considered anew. This is assisted by both the Yeovil Peripheral Landscape Study (PLS) and Landscape Addendum (LA). These documents provide the first thorough assessment of the capacity of the town's edge to accommodate development. Whilst it is accepted that there will be landscape impact, development here will enable more sensitive areas at Yeovil's edge to remain free from development (PLS fig. 5). It is not accepted that the PLS and its LA have not been consistent in their assessment.</p>
Historic Environment - Due weight not given to impact on historic assets in East Coker.	<p>The Council contends that the Historic Environment Assessment of Yeovil Periphery (July 2010) considers all historic assets and their sensitivity, including those at East Coker. This informed the Strategic Growth Options for Yeovil SA.</p>
Highways/traffic - Object due to increased traffic in an area where the road infrastructure is already inadequate, and no proposals are put forward to address this e.g. congestion issues at Hendford Hill, Quicksilver Mail roundabout, A37, West Coker Road.	<p>Noted. Traffic modelling shows little difference between the various options for an urban extension, with background traffic growth being the major contributor to deterioration of highway network performance. The modelling shows: traffic flow increases on Hendford Hill of less than 10%; some congestion on the Quicksilver Mail roundabout, but still operating within capacity; decrease in congestion along the A37; traffic flow increase of up to 3% along the West</p>

⁷ Overarching NPS for Energy, DECC, July 2011; Hazardous Waste NPS, DEFRA, June 2013; draft NPS for National Networks, December 2013.

	Coker Road. More detailed work on proposals to address traffic issues will be considered in the emerging Yeovil Transport Strategy Review 2 and the forthcoming Site Allocations DPD
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3.1.17. **Conclusion:** The consideration of issues at Coker does not affect the overall decision made to identify the location as a SUE.

Overall Conclusion for Soundness Issue 1: Policies YV1 – Urban Framework and Greenfield Housing Requirement for Yeovil, and YV2 – Yeovil Sustainable Urban Extension (Proposed Main Modifications PMM1 and PMM2)

3.1.18. Based upon analysis of the consultation responses, and a number of discussions with relevant stakeholders, the conclusion on Proposed Main Modification 1 is as follows:

- A minor text/graphical amendment to Proposed Main Modification 1 to include a full map key to aid explanation of approach in Yeovil;
- The buffer zone set out in Policy YV3 may no longer be required due to the revised scale of growth the south of Yeovil;
- Additional transport assessment work reveals that impacts on highway network can be managed, but it is unlikely that Policy YV6 could be implemented as currently written.
- Secondary school education capacity remains an area of concern for respondents, the Council and SCC. An education topic paper will be produced to clarify approach and establish a way forward to support the implementation of Policy YV2.
- Education should be inserted as a bullet point into Policy SS6: Infrastructure Delivery, along with an update to the supporting text.

Recommendation for Soundness Issue 1: Policies YV1 – Urban Framework and Greenfield Housing Requirement for Yeovil, and YV2 – Yeovil Sustainable Urban Extension (Proposed Main Modifications PMM1 and PMM2)

3.1.19. It is recommended that Project Management Board endorse the decision that emerging Local Plan Policy YV1 and Policy YV2 remain as written in PMM1 and that they should be submitted to the Inspector for the resumption of the Examination.

3.1.20. That Project Management Board considers the status of emerging Local Plan Policy YV6 and that it may be amended prior to submission to the Inspector for the resumption of the Examination.

3.1.21. That Project Management Board considers whether emerging Local Plan Policy YV3 is removed as part of the Proposed Main Modifications process, and it should not therefore be submitted to the Inspector for consideration on resumption of the Examination.

3.1.22. Endorse minor revision to Policy SS6 to include “education” as part of the bullet point list of infrastructure provision.

3.2. Soundness Issue 2: Policy PMT3 – Ilminster Direction of Growth (Proposed Main Modification 3)

- 3.2.1. The Inspector’s Preliminary Findings raised a significant issue of concern in relation to the proposed Direction of Growth for Ilminster. At paragraphs 54 and 55, he indicated that an error in the Sustainability Appraisal (SA) demonstrated that the Direction of Growth proposed at that time would result in Policy PMT3 being found unsound.
- 3.2.2. To address the Inspector’s concerns, the Council has reviewed the evidence base for Ilminster and revised the SA for the Direction of Growth. This has resulted in the Council’s Proposed Main Modification (PMM3) seeking to delete the Direction of Growth to the south-east of the town (Shudrick Valley) and replace it with a Direction of Growth to the south-west (Canal Way).

Analysis of the Key Issues and the Council’s Response

- 3.2.3. There were 513 comments made for PMM3, 439 in support, 71 objections and 3 observations. It must be noted that in the 71 objections, one response included a petition signed by 318 people. Key stakeholder respondents include: Somerset County Council (Education), Ilminster Town Council, the Highways Agency, and the Environment Agency.
- 3.2.4. The following key issues⁸ were identified for Ilminster in relation to Proposed Main Modification 3 and Policy PMT3. Against each of the key issues, the Council’s response is noted.

i. Sustainability Appraisal

- 3.2.5. There have been a number of objections relating to the scoring and overall conclusions in the re-drafted SA for the Direction of Growth at Ilminster. Discussions have taken place between the Council, Somerset County Council, and independent consultants Enfusion to assess whether the issues raised should result in any amendments to the SA. The table below summarises the key issues.

Key Issue	South Somerset District Council Response
Objective 4 – “Improve Health and Well Being” – the proximity of Canal Way to the new medical centre results in a more positive scoring, this is queried, and the positive health benefits of Shudrick Valley are not fully articulated.	Having re-considered the distances to the Medical Centre, and the other health facilities in the town centre, it is not considered that there is a significant difference between Shudrick Valley and Canal Way. Therefore it is proposed to amend the Canal Way scoring to “+ / -“. All other scores for this Objective remain the same.
Objective 8 – question the Shudrick Valley need to deliver a new access route through town.	Discussions with Somerset County Council have questioned the need for Shudrick Valley to deliver an alternative route through the town. It is felt that the scoring approach to this Objective has not been consistent. Therefore it is proposed to amend the Shudrick Valley scoring to “+ / -“. All other scores for this Objective remain the

⁸ It is recognised that there are a number of other issues which have been raised in relation to Policy PMT3 and PMM3, including impacts on: scale of housing growth in Ilminster; the strategy for growth in Ilminster; town centre vitality and viability; landscape; the value of agricultural land; historic environment; flood risk; Coldharbour Farm; residential amenity; and biodiversity. These other issues are being considered in detail and the analysis will be published later for consideration by the Council’s District Executive, Full Council, and also for use during the resumption of the Local Plan Examination.

	same.
Objective 10 - scoring fails to take into account that Canal Way contains medieval Deer Park and Stone Age and Roman remains Canal Way abuts the only surviving part of the Chard to Ilminster canal, development could impact upon this. "The Stop Way Line" is located along Canal Way option.	Discussions with historic environment specialists at Somerset County Council and South Somerset District Council have highlighted that the approach to assessment of impacts on historic environment is not consistent across all three Options. It is felt that there is sufficient uncertainty about the impact of Option 2 on the historic environment that it cannot be deemed to have a "Neutral effect". Therefore, it is proposed to amend the Option 2 scoring to "-". All other scores for this Objective remain the same.

3.2.6. **Conclusion:** The amendments to the scoring for the SA do not affect the overall decision made to identify a Direction of Growth at Canal Way.

ii. Transport and Highway Capacity

- 3.2.7. There are concerns that the local road network cannot accommodate the increase in transport movements associated with the proposed Direction of Growth.
- 3.2.8. The Highways Agency has objected on the basis that no assessment has been undertaken of the impact of the proposed development on the Southfields roundabout.

Key Issue	South Somerset District Council Response
Object to residential development as commuting will increase as a result of development at Canal Way due to its proximity to A303, A358, and this will increase the dormitory nature of Ilminster.	Discussions have taken place with the Highways Agency and Somerset County Council regarding highway capacity in Ilminster.
Evidence should be prepared to assess the impact of the proposed development on the operation of the Southfields roundabout.	SSDC, SCC, and the Highways Authority have undertaken additional transport modelling work to establish trip generation/distribution patterns and ascertain the impacts of Canal Way on the strategic highway network. There is no evidence to suggest that development cannot be accommodated within the Direction of Growth.
Object to residential development as the eastward movement of additional traffic at key times (school run, shopping) is not feasible because of the nature of the T-junction at Orchard Vale/Ditton Street.	It would be for a specific planning application(s) to demonstrate that there was sufficient highway capacity to accommodate additional movements, provide detailed design on road junction improvements (where necessary), and for an appropriate mitigation strategy to overcome significant adverse impacts.

3.2.9. **Conclusion:** The further consideration of highways impacts does not affect the overall decision made to identify a Direction of Growth at Canal Way.

iii. Social Infrastructure

- 3.2.10. There is general concern regarding a lack of infrastructure in Ilminster, specifically the shortage of capacity within existing schools to accommodate pupils from development within the Direction of Growth.

Key Issue	South Somerset District Council Response
<p>Object to residential development as there is no capacity in the existing schools to accommodate pupils from the new development.</p>	<p>Further discussions with Somerset County Council have highlighted additional evidence in relation to education provision in Ilminster.</p> <p>This confirms that there is only limited capacity within first/primary schools in Ilminster, but that additional investment (S.106 contributions and devolved capital funds from Government), along with management solutions will enable sufficient capacity to be realised up to meet anticipated growth.</p> <p>It is the preferred objective of SCC and SSDC to deliver a new first/primary school within Ilminster. However, as identified in the revised SA, there is no existing commitment to a new school and it is not within SCC's Capital Programme, with no formal decision made by SCC Members regarding this issue.</p> <p>What is clear is that SCC own the land at Canal Way and confirmation of the Direction of Growth at Canal Way in the emerging Local Plan provides one opportunity to explore (with SCC) how best to overcome existing education capacity constraints and the potential for delivering a new school.</p>

- 3.2.11. **Conclusion:** Whilst education capacity is clearly an issue for Ilminster, there is confirmation that capacity can be managed through contributions and central capital funding. This means that this issue does not affect the overall decision made to identify a Direction of Growth at Canal Way.
- 3.2.12. Nevertheless, SSDC and SCC will collaborate to produce an Education Topic Paper which will confirm the supply and demand issues in relation to education provision in Ilminster.

Overall Conclusion for Soundness Issue 2: Policy PMT3 – Ilminster Direction of Growth (Proposed Main Modification 3)

- 3.2.13. Based upon analysis of the consultation responses, and a number of discussions with relevant stakeholders, the conclusion on Proposed Main Modification 3 is as follows:
- Revisions are necessary to the SA scoring for the Options for the Direction of Growth in Ilminster, but that this does not result in a change to the wording in PMM3 or Policy PMT3;
 - Concerns about local and strategic highway capacity have been addressed to the satisfaction of the Highways Authority and Highways Agency. This does not result in change of working in PMM3 or Policy PMT3; and

- Concerns about local education capacity have been addressed to the satisfaction of the Education Authority. An Education Topic Paper will be produced for the resumption of the Examination. This does not result in change of working in PMM3 or Policy PMT3.

Recommendation for Soundness Issue 2: Policy PMT3 – Ilminster Direction of Growth (Proposed Main Modification 3)

- 3.2.14. It is recommended that Project Management Board endorse the decision that emerging Local Plan Policy PMT3 remains as written in PMM3 and that this should be submitted to the Inspector for the resumption of the Examination.

3.3. Soundness Issue 3: Policy SS3 Delivering New Employment (Proposed Main Modification 4)

- 3.3.1. The Inspector’s Preliminary Findings (paragraphs 56 – 59) raised a significant issue of concern in relation to the distribution of employment land within the Primary Market town of Wincanton, three other Local Market Towns, and each of the six Rural Centres.
- 3.3.2. To address the Inspector’s concerns, the Council has reviewed the evidence base for the distribution of employment land, clarifying the methodology and creating greater specificity in the apportionment of employment land to 10 settlements in the district (four Market Towns, six Rural Centres). Further changes were also made in relation to the overall employment land allocation for the Rural Settlements. This amendment was based on a revision to the methodology used to define the scale of employment land required in the Rural Settlements.
- 3.3.3. The full detail behind the refinement of the evidence base and methodology can be found in Item 4B: Proposed Main Modification Background and Further Evidence presented to PMB Workshop 30 on the 25th October 2013. This work has resulted in the Council’s Proposed Main Modification 4 (PMM4) seeking to provide more specific additional employment land in the settlements.

Analysis of the Key Issues and the Council’s Response

- 3.3.4. There were 24 comments made for PMM4, 4 in support, 18 objections and 2 observations. Key stakeholder respondents include: Somerset County Council (Public Health), Martock Parish Council, and Lopen Parish Council
- 3.3.5. The following key issues⁹ were identified for employment land provision in relation to the Proposed Main Modification 4 and Policy SS3. Against each of the key issues, the Council’s response is noted.

i. Employment Land at South Petherton and Lopen Head

- 3.3.6. A number of responses queried the calculation for employment land at South Petherton and the inter-relationship with Lopen Head.

Key Issue	South Somerset District Council Response
The calculations for the employment land identified for rural settlements and South Petherton are unsound. Lopen Head provision as acknowledged within PMB report p21 falls within the Rural Settlements category and does not serve the Rural Centre of South Petherton.	<p>The additional evidence presented as Item 4B: Proposed Main Modification Background and Further Evidence to the PMB Workshop 30 on the 25th October 2013 clarifies the relationship between South Petherton and Lopen Head Nursery in terms of previous and future employment land provision.</p> <p>Lopen Head has a planning history associated with a previous allocation provided for through the Local Plan 1991 – 2011, along with other associated permissions granted on the basis of local and national policies allowing for the presumption in favour of sustainable development, and supporting a prosperous rural</p>

⁹ It is recognised that there are a number of other issues which have been raised in relation to Policy SS3 and PMM4, including: employment land within Rural Settlements; and development at Durslade Farm, Bruton. These other issues are being considered in detail and the analysis will be published later for consideration by the Council’s District Executive, Full Council, and also for use during the resumption of the Local Plan Examination.

	<p>economy – in particular Paragraph 28 of the NPPF.</p> <p>Given the existing employment use at Lopen Head, any future development proposals would be considered on their merits, against a range of emerging Local Plan policies, including Policy EP4: Expansion of Existing Businesses in the Countryside.</p> <p>It is intended (as noted in Item 4B) that the additional employment land of 0.66Ha identified for South Petherton should be delivered 'within the settlement boundary or adjacent to it'. Future decisions on delivery of additional employment land will be made alongside the wider Local Plan policy framework, including Policy SD1, Policy SS1, and Policy SS3.</p>
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3.3.7. **Conclusion:** The calculation for employment land provision for South Petherton is deemed robust and respects the type, size and nature of one of the largest Rural Centres in the district. Potential future development at Lopen Head will be managed through the national and local policy framework as a site of established employment use. Minor text amendments are required within the supporting text of the Local Plan itself (not to Policy SS3 or elsewhere) to ensure that the intention for employment land to be developed South Petherton is made clear. This issue does not affect the overall decisions made to apportion employment land as set out in PMM4 and Policy SS3.

ii. Disaggregation of Employment Land by Use Class

3.3.8. It has been suggested that the Council should not differentiate between B Use and Non-B Use in classifying employment land

Key Issue	South Somerset District Council Response
Land should be identified for economic development and not distinguish between B uses and non B uses	The evidence base and trend data clearly identifies that South Somerset's economic profile is dominated by a resilient and growing advanced manufacturing sector. To continue to support and enhance the industries within this sector, a focus on B Uses is deemed appropriate. This focus will allow for the 'economic-led growth strategy' to be fulfilled. Non-B Use jobs will be expected to be delivered throughout the Local Plan period. Non-B Uses are most likely to be those associated with main town centre uses (as defined in the NPPF). As such, the emerging Local Plan establishes a policy framework to consider development applications for these uses under emerging Policy EP11: Location of Main Town Centre Uses (the Sequential Approach).

3.3.9. **Conclusion:** The methodology followed to derive the employment land provisions is deemed to be robust. The split between B Use and Non-B Use is deemed correct given the type, nature and profile of the economy within South Somerset and the focus on the manufacturing sector. This issue does not affect the overall decisions made to apportion employment land as set out in PMM4 and Policy SS3.

iii. Employment Land at Ilchester and RNAS Yeovilton

3.3.10. A number of responses queried the calculation for employment land at Ilchester and RNAS Yeovilton.

Key Issue	South Somerset District Council Response
Total number of jobs figure for Ilchester is disproportionate to the resident population excluding MOD personnel/families, which are already employed in Yeovilton	The employment land provision for Ilchester has been defined in light of the type and nature of the jobs profile at RNAS Yeovilton. However, the 1Ha of employment land relates to the expected market demand for employment within the Rural Centre of Ilchester itself, not any employment directly associated with RNAS Yeovilton, as it is agreed that this is likely to be accommodated within the existing footprint of the air base.

3.3.11. **Conclusion:** The employment land provision at Ilchester is robust as it is in line with market demand signals and is not directly dependent upon RNAS Yeovilton. This issue does not affect the overall decisions made to apportion employment land as set out in PMM4 and Policy SS3.

Overall Conclusion for Soundness Issue 3: Policy SS3 Delivering New Employment (Proposed Main Modification 4)

3.3.12. Based upon analysis of the consultation responses, and a number of discussions with relevant stakeholders, the conclusion on Proposed Main Modification 4 is as follows:

- Minor text amendments are required within the Local Plan itself to clarify the circumstances for employment land provision in South Petherton, but this does not result in a change to the wording in Proposed Main Modifications 4 or Policy SS3;
- The split between B Use and Non-B Use is deemed correct given the type, nature and profile of the economy within South Somerset and the focus on the manufacturing sector. This does not result in a change to the wording in PMM4 or Policy SS3; and
- The relationship between employment at Ilchester and RNAS Yeovilton is clearly established in the original and updated methodology. This does not result in a change to the wording in PMM4 or Policy SS3.

Recommendation for Soundness Issue 3: Policy SS3 Delivering New Employment (Proposed Main Modification 4)

3.3.13. It is recommended that Project Management Board endorse the decision that emerging Local Plan Policy SS3 remains as written in Proposed Main Modification 4 and that this should be submitted to the Inspector for the resumption of the Examination.

3.4. Point for Clarification 1: Policy SS5 Delivering New Housing Growth (Proposed Main Modification 5)

- 3.4.1. The Inspector’s Preliminary Findings (paragraphs 56 – 59) raised a significant issue of concern in relation to the distribution of employment land within the Primary Market town of Wincanton, three other Local Market Towns, and each of the six Rural Centres.
- 3.4.2. To address the Inspector’s concerns, the Council has reviewed the evidence base for the distribution of employment land, clarifying the methodology and creating greater specificity in the apportionment of employment land to 10 settlements in the district (four Market Towns, six Rural Centres). Further changes were also made in relation to the overall employment land allocation for the Rural Settlements. This amendment was based on a revision to the methodology used to define the scale of employment land required in the Rural Settlements.
- 3.4.3. The full detail behind the refinement of the evidence base and methodology can be found in Proposed Main Modification Background and Further Evidence presented to PMB Workshop 30 on the 25th October 2013, and the Housing Topic Paper (January 2013). This work has resulted in the Council’s Proposed Main Modification 5 (PMM5) seeking to introduce interim guidance for how applications for housing growth will be determined prior to the Site Allocations Development Plan Document.

Analysis of the Key Issues and the Council’s Response

- 3.4.4. There were 20 comments made for PMM5, 3 in support, 16 objections and 1 observation. Key stakeholder respondents include: Martock Parish Council, and a number of private sector landowners and house builders.
- 3.4.5. The following key issues¹⁰ were identified for Ilminster in relation to Proposed Main Modification 5 and Policy SS5. Against each of the key issues, the Council’s response is noted.

Key Issue	South Somerset District Council Response
Fails to give clarity on how to deal with housing proposals in Market Towns that have no defined Direction of Growth	<p>The Council recognises that the supporting wording is not clear in places. It is suggested that a footnote is added to Policy SS5 to state that given Wincanton’s residual housing allocation it is not deemed necessary to define a Direction of Growth for housing. As such a ‘permissive approach’ is not required. However, planning applications will be considered on their merits, against the policies in the Local Plan and the National Planning Policy Framework.</p> <p>As noted in the Inspector’s Preliminary Findings (paragraphs 63 and 64), the Council has added specific additional wording to clarify how future housing delivery will be managed in Wincanton. With future demand monitored to ensure Wincanton achieves a balance of both housing and economic growth.</p>

¹⁰ It is recognised that there are a number of other issues which have been raised in relation to Policy SS5 and PMM5, including: the impact of MOD’s actions on housing growth, potential development outside Rural Centres, and demonstrating a five-year housing land supply. These other issues are being considered in detail and the analysis will be published later for consideration by the Council’s District Executive, Full Council, and also for use during the resumption of the Local Plan Examination.

<p>Crewkerne is the only Market Town not having an identified Direction of Growth. Has been omitted from the scope of Policy SS5 therefore implying a less positive approach.</p>	<p>The Council recognises that the supporting wording is not clear in places. It is suggested that footnote is added to Policy SS5 to state that given Crewkerne’s residual housing allocation it is not deemed necessary to define a Direction of Growth. As such a ‘permissive approach’ is not required. However, planning applications will be considered on their merits, against the policies in the Local Plan and the National Planning Policy Framework.</p>
<p>Permissive approach does not give enough clarity of certainty to the development industry or community</p>	<p>Permissive approach should be extended to Yeovil as the ‘strategically significant’ town and is at odds with paragraph 2.14 of the Proposed Main Modifications Consultation Document... Recommendation: Amend PMM5 as follows: Paragraph 4.103: “....whilst not detracting from the delivery of appropriate levels of growth in <u>Yeovil</u>, all the market towns and rural centres.....” Policy SS5: “.....proposals in ‘directions of growth’ at <u>Yeovil and the Market Towns...</u>” Amend PMM6 as follows: Paragraph 4.63: “....whilst not detracting from the delivery of appropriate levels of growth in <u>Yeovil</u>, all the market towns and rural centres.....” Policy SS3: “.....proposals in ‘directions of growth’ at <u>Yeovil and the Market Towns...</u>”</p>

3.4.6. **Conclusion:** Minor text amendments are required to ensure that the overall approach set out in Policy SS5 is made clear. However, these issues do not affect the overall decisions made to establish the permissive approach set out in PMM5 and Policy SS5.

Overall Conclusion for Point for Clarification 1: Policy SS5 Delivering New Housing Growth (Proposed Main Modification 5)

3.4.7. Based upon analysis of the consultation responses, and a number of discussions with relevant stakeholders, the conclusion on Proposed Main Modification 5 is as follows:

- Minor text amendments to clarify the position in relation to Wincanton, Crewkerne, and Yeovil. These do not result in a change to the wording in PMM5 or SS5.

Recommendation for Point for Clarification 1: Policy SS5 Delivering New Housing Growth (Proposed Main Modification 5)

3.4.8. It is recommended that Project Management Board endorse the decision to make minor text amendments to aid clarity, but that emerging Local Plan Policy SS5 remains as written in PMM5 and that this should be submitted to the Inspector for the resumption of the Examination.

3.5. Point of Clarification 1: Policy SS3 – Delivering New Employment (Proposed Main Modification 6)

Analysis of the Key Issues and the Council’s Response

- 3.5.1. There were 5 responses received for PMM6, 1 in support, 3 objections and 1 observation.
- 3.5.2. The following key issue was identified for Delivering New Employment in relation to the Proposed Main Modification 6 and Policy SS3.

Key Issue	South Somerset District Council Response
Permissive approach being applied to Rural Centres as it is not necessary and could lead to development in the open countryside or Rural Settlements.	The text proposed to be added to Policy SS3 makes it clear that the same considerations should “... <i>apply when considering housing proposals (wherever located) adjacent to Rural Centres.</i> ” This is as well as specifically referring to the need to take into account the overall scale of growth proposed for each Rural Centre over the plan period. It is considered that the use of “adjacent” protects against excessive encroachment into the open countryside. Inclusion of Rural Centres helps to provide a clear indication of how the decision maker should react to a development proposal at Rural Centres until the Site Allocations DPD is adopted. Development in Rural Settlements will be considered in the context of Emerging Local Plan Policy SS2: Development in Rural Settlements.

Overall Conclusion for Point of Clarification 1: Policy SS3 – Delivering New Employment (Proposed Main Modification 6)

- 3.5.3. Based upon analysis of the consultation responses, and a number of discussions with relevant stakeholders, the conclusion on Proposed Main Modification 6 is that no change is required to Proposed Main Modification 6 or Policy SS3.

Recommendation for Point of Clarification 1: Policy SS3 – Delivering New Employment (Proposed Main Modification 6)

- 3.5.4. It is recommended that Project Management Board endorse the decision that emerging Local Plan Policy SS3 remains as written in PMM6 and that this should be submitted to the Inspector for the resumption of the Examination.

3.6. Point of Clarification 2: Wincanton Housing Growth (Proposed Main Modifications 7)

Analysis of the Key Issues and the Council’s Response

3.6.1. There were 10 comments made for PMM7, 1 in support, 8 objections and 1 observation. The following key issues were identified for Wincanton Housing Growth in relation to Proposed Main Modification 7. Against each of the key issues, the Council’s response is noted.

Key Issue	South Somerset District Council Response
PMM7 still does not overcome the need for additional housing in Wincanton over	PMM7 introduces additional text to allow housing provision in Wincanton to be supplemented where required through the Council’s on-going monitoring process. Monitoring will be through the on-going reporting mechanism which includes assessing housing and employment land delivery on a settlement by settlement basis. This will be reported via the Council’s Authorities Monitoring Report. Should it become clear that there is an issue at Wincanton the additional text proposed as part of PMM7 means that a specific statutory Local Plan amendment would be made including consideration of the options available at that time.
Housing should be linked to, and underpinned by, local employment growth in the town	Noted. It is the Council’s intention that there is a sustainable pattern of development in Wincanton and that housing is delivered alongside economic growth. The changes already set out in PMM7 are designed to achieve this balance, with monitoring processes in place to allow the Council to reconsider levels of housing growth when economic growth when and where appropriate.
On-going monitoring approach for Wincanton’s housing growth. It is not a credible solution.	Monitoring will be through the on-going reporting mechanism which includes assessing housing and employment land delivery on a settlement by settlement basis. This will be reported via the Council’s Authorities Monitoring Report. Should it become clear that there is an issue at Wincanton the additional text proposed as part of PMM7 means that a specific statutory Local Plan amendment would be made including consideration of the options available at that time.

Overall Conclusion for Point of Clarification 2: Wincanton Housing (Proposed Main Modifications 7)

3.6.2. Based upon analysis of the consultation responses, and a number of discussions with relevant stakeholders, the conclusion on Proposed Main Modification 7 is as follows:

- A minor text amendment is required to the supporting wording for Wincanton in order to clarify the desired approach for development in Wincanton but that this does not result in a substantial change to the approach established in PMM7;

- An employment topic paper will be produced to help clarify the process for defining economic growth within the district and to assist in explaining the approach for established in PMM7.

Recommendation for Point of Clarification 2: Wincanton Housing (Proposed Main Modifications 7)

- 3.6.3. It is recommended that Project Management Board endorse the decision that some minor amendments are made to PMM7 to aid clarity and understanding, and that this should be submitted to the Inspector for the resumption of the Examination.

3.7. Gypsy and Traveller Needs Assessment Update: Policy HG7 Gypsies, Travellers and Travelling Showpeople (Proposed Main Modification 8)

Analysis of the Key Issues and the Council's Response

- 3.7.1. There was 1 comments made for PMM8, a single observation by the Environment Agency. Against this issue, the Council's response is noted.

Key Issue	South Somerset District Council Response
The principles of Climate Change Policy EQ1 should prevent inappropriate development being located in the Flood Risk areas through the application of National Planning Policy Framework's Sequential Test.	Noted. In addition to emerging Local Plan Policy EQ1, emerging Local Plan Policy HG7: Gypsies, Travellers and Travelling Showpeople includes a criterion stating " <i>the health and safety of occupants and visitors will not be at risk through unsafe access to sites, noise pollution or unacceptable flood risk</i> ".

Overall Conclusion for Gypsy and Traveller Needs Assessment Update: Policy HG7 Gypsies, Travellers and Travelling Showpeople (Proposed Main Modification 8)

- 3.7.2. Based upon analysis of the consultation response, and discussions with relevant stakeholders, it is concluded that no further changes are required to Policy HG7 and that the amendment set out in Proposed Main Modification 8 should remain.

Recommendation for Gypsy and Traveller Needs Assessment Update: Policy HG7 Gypsies, Travellers and Travelling Showpeople (Proposed Main Modification 8)

- 3.7.3. It is recommended that Project Management Board endorse the decision that emerging Local Plan Policy HG7 remains as written in Proposed Main Modification 8 and that this should be submitted to the Inspector for the resumption of the Examination.

3.8. Point of Clarification 3: Reference to Non-Statutory Documents (Proposed Minor Modifications M93 - M97)

Analysis of the Key Issues and the Council's Response

- 3.8.1. There were 3 comments made for Point of Clarification 3, none in support, 2 objections and 1 observation. The following key issue was identified for Reference to Non-Statutory Documents in relation to Point of Clarification 3. Against the key issue, the Council's response is noted.

Key Issue	South Somerset District Council Response
Minor Mod M94 provides no clarity regarding implications for Delivery of Chard Eastern Development Area. Chard Implementation Plan (2010) is already out of date and clear indication that the development will not proceed in a timely manner.	Proposed Minor Modification M94 is quite clear that the Chard Implementation Plan, 2010 provides a basis for phasing in the Chard Eastern Development Area to ensure the timely delivery of infrastructure; it is considered that the document is still of relevance. M94 provides flexibility by allowing for deviation from that phasing sequence where it is justified and it can be demonstrated that the proposal will not compromise delivery of the total growth. South Somerset District Council is working with landowners/developers within the Chard Eastern Development Area to ensure that a joined up approach is taken to delivery of the growth including essential infrastructure such as roads.

Overall Conclusion for Point of Clarification 3: Reference to Non-Statutory Documents (Proposed Minor Modifications M93 - M97)

- 3.8.2. Based upon analysis of the consultation responses, and discussions with relevant stakeholders, it is concluded that Proposed Minor Modifications M93 to M97 should remain as currently written.

Recommendation for Point of Clarification 3: Reference to Non-Statutory Documents (Proposed Minor Modifications M93 - M97)

- 3.8.3. It is recommended that Project Management Board endorse the decision that emerging Proposed Minor Modifications M93 to M97 remain and should be submitted to the Inspector for the resumption of the Examination.

4. Next Stages and Recommendations

- 4.1.** The Inspector appointed to examine the South Somerset Local Plan wrote to the Council on 28th January 2014. In his letter the Inspector noted his desired date for resumption of the Examination Hearing Sessions – the 2nd June 2014.
- 4.2.** The Inspector also requested that the Council confirm it is in a position to submit the Proposed Main Modifications on the 18th March 2014, as documented in the Council's project timeline submitted to the Inspector on the 25th July 2013.
- 4.3.** Based upon the Inspector's recent letter, and the need to ensure that the Council meets its proposed deadline for producing the Proposed Main Modifications, the Project Management Board is asked to consider the following recommendations:
1. To endorse the amendments to the Proposed Main Modifications and recommend that these progress to District Executive and Full Council for further sign-off;
 2. Consider the status of Policy YV6 in light of concerns raised in consultation responses and further discussions with the Highways Authority and the Highways Agency; and
 3. To endorse the continuation of other work necessary to ensure that the Council is positively prepared for the resumption of the Examination and the Hearing Sessions, including:
 - a. Responding to a series of additional questions set out by the Inspector prior to the Hearing Sessions and clarifying the Council's position on a number of matters prior to the Examination resuming;
 - b. Continuing to work with Prescribed Bodies to discharge responsibilities under the Duty to Co-operate;
 - c. To prepare and agree a number of Statements of Common Ground / Memorandum of Understanding with key stakeholders and interested parties prior to the resumption of the Examination; and
 4. To delegate final editing of text for submission to the Planning Inspector to the Project Management Board and Senior Officers.
- 4.4.** Subject to sign-off, the Council will then undertake the above work packages between February and the end of May 2014 to ensure the Council is in a state of readiness for the resumption of the Examination and Hearing Sessions on the 3rd June 2014.